

**Bassetlaw Local Plan
2020-2038**

Publication Version

**August 2021 Consultation - Summary
of Representations Schedule**

Introduction

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name: Representation Reference: 1935100.1 Name: Sheffield City Council	Refers to: Foreword and Contents Page	Legal compliance and soundness: Legal compliance - not specified. Soundness of plan - not specified. Plan does not comply with Duty to Co-operate	Comments: There is only one mention of climate change in the Foreword, which gives an impression of a lack of priority regarding concerns around the global climate and biodiversity emergency. Recognise there is significant content relating to these issues in the policies, but the headings and general text do not reflect this. The majority of the climate change policies are under '10. Greening Bassetlaw'; which gives the impression that the policy is just about planting vegetation, a lack of emphasis on such important issues despite the compelling content within the policies.	Suggested changes: None	Officer comments: The Foreword is the Portfolio Holder for Regeneration's introduction to the Local Plan and is a high level introduction to content. As a representative of the community the focus of the Foreword focuses more around anticipated community concerns, which at the time of writing related to the spatial strategy, and encouraging engagement during the consultation process.
Representation Reference: 1935100.2 Name: Sheffield City Council	Refers to: Paragraphs 1.5.5 and 1.16.1	Legal compliance and soundness: Legal compliance - not specified. Soundness of plan - not specified. Plan does not comply with Duty to Co-operate	Comments: The references to Sheffield City Region (now the South Yorkshire Mayoral Combined Authority) and their Strategic Economic Plan in paragraphs 1.5.5 and 1.16.1 page 9 should include references to the SCR Strategic Employment Land Appraisal (SELA) Summary Report. This analysed levels of need and supply of employment land across the city region and by individual authority. It concluded that there was a surplus of employment	Suggested changes: The Bassetlaw Plan should recognise this well documented regional issue and address it, in order to justify the level of employment land allocations proposed.	Officer comments: Paragraph 1.5.5 is a high level introduction to the role of Sheffield City Region MCA (now South Yorkshire) and Bassetlaw's role within it. Therefore the focus is the SEP. The SELA is considered to be part of the Local Plan evidence base covered

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>land in Bassetlaw of 40 hectares, based on a need of 68 hectares and a supply of 108. The level of supply proposed in the draft Plan is much higher at 169 hectares (not including a strategic site of 118 hectares). The over-supply of employment land in Bassetlaw identified in the SELA is therefore an acknowledged cross-boundary issue that is exacerbated by further over-provision in the draft plan compared to the situation at the time of the SELA.</p>		<p>by 1.7. The purpose of the introduction is not to list all relevant evidence base documents; these should be highlighted in the relevant topic based sections/policies. On that basis the SELA is referenced in para 6.1.18. The SELA has a strategic role and was accurate at that point in time (2019-20); the Bassetlaw HEDNA, Nov 2020 is provides an up to date and robust assessment of the district-wide employment land position for the plan period.</p>
<p>Representation Reference: NRF-REF021.2 Name: Derbyshire County Council</p>	<p>Refers to: Introduction Paragraph 1.1.13</p>	<p>Legal compliance and soundness: Legal compliance of plan - not specified. Soundness of plan - not specified.</p>	<p>The District Council considers that the housing and economic needs of Bassetlaw over the Plan period can be met within the District. This is welcomed and supported as the approach would be likely to have minimal implications for the northern Derbyshire local planning authorities in potentially having to accommodate any unmet needs arising in</p>	<p>Suggested changes: No suggested changes</p>	<p>Officer Comments: Noted</p>

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
		Compliance of plan with Duty to Co-operate - not specified.	Bassetlaw and also potentially for Derbyshire County Council in having to facilitate the delivery of necessary infrastructure to support any such unmet housing needs that arise in Derbyshire part of the HMA. Noted in para 1.13.3 that this principle will be evidenced in Statements of Common Ground (SoCG) between the relevant parties. Derbyshire County Council has recently contributed to the production of a HMA wide SoCG as appropriately set out in para 5.1.18; it has been agreed that each authority within the North Derbyshire and Bassetlaw Housing Market Area will meet its own needs.		
Representation Reference: REF035.1 Name: Home Builders Federation	Refers to: Duty to Cooperate	Legal compliance and soundness: Plan is legally compliant. Plan is unsound. Plan does not comply with the Duty to Cooperate.	Comments: Bassetlaw District adjoins seven other LPAs (Bolsover, Doncaster, Mansfield, Newark & Sherwood, North Lincolnshire, Rotherham, and West Lindsey) and is part of the North Derbyshire & Bassetlaw Housing Market Area (HMA). There is an identified overlap between this HMA and the Sheffield City Region HMA with recognised functional economic links between the two HMAs. Bassetlaw is a member of the D2N2 LEP and part of the Sheffield City Region Combined Authority. The pre-submission consultation is accompanied by six SoCG and a DtC	Suggested changes: The Council intends to update existing SoCG and agree other SoCG with relevant parties before the Local Plan is submitted for examination. After publication of these updated and additional SoCG, the HBF may submit further representations on the Council's compliance with the DtC and any implications for the soundness of the	Officer comments: DTC is an iterative process. The 2022 May Addendum was accompanied by 12 signed SOCGs and a further two SOCGs agreed in principle. These confirm that the district is delivering all development requirements in its administrative area and has not agreed to accommodate the

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>Compliance Statement. It is understood that the Council is proposing to deliver all its development requirements within its own boundaries and no requests to address the development needs of neighbouring LPAs have been received. Under the revised standard methodology, Sheffield is subject to the 35% Cities & Urban Areas Uplift, which increases housing needs from to 50,000 dwellings between 2021 –2038. This increase may have implications for the Sheffield City Region HMA.</p>	<p>Bassetlaw Local Plan in written Examination Hearing Statements or orally during Examination Hearing Sessions</p>	<p>needs of any other authority. This includes Sheffield City. The HMA authorities have now signed a SOCG confirming this. Bassetlaw sits within a separate and distinct HMA to Sheffield and is under no obligation to meet the development needs of adjoining HMA authorities. DTC meetings have been held with Sheffield City Council, the South Yorkshire Authorities and the South Yorkshire Combined Authority. It is for the Sheffield City Local Plan to identify how the 35% uplift will be accommodated.</p>
<p>Representation Reference: REF043.2</p> <p>Name: Gladmans</p>	<p>Refers to: Duty to Cooperate</p>	<p>Legal compliance and soundness: Plan is legally compliant and complies with Duty to Cooperate.</p>	<p>Comments: Planning guidance sets out that local planning authorities should produce, maintain, and update one or more Statement(s) of Common Ground (SoCG), throughout the plan making process. The SoCG(s) should provide a written record of</p>	<p>Suggested changes: None</p>	<p>Officer comments: There has been on-going and continuous engagement and cooperation with neighbouring authorities and Duty to</p>

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name:		Plan is unsound.	the progress made during the process of planning for strategic cross-boundary matters and will need to demonstrate the measures local authorities have taken to ensure cross boundary matters have been considered and what actions are required to ensure issues are proactively dealt with e.g. unmet housing needs.		cooperate bodies on strategic matters. This is set out in the Duty to Cooperate Statements supported by SoCGs.
Representation Reference: 1935100.3 Name: Sheffield City Council	Refers to: Paragraph 4.4	Legal compliance and soundness: Legal compliance - not specified. Plan is unsound. Plan does not comply with Duty to Co-operate	Comments: Paragraph 4.4 does not reflect the later policy wording that clearly states the Apleyhead strategic employment site will be focused on meeting an identified need for logistics that may arise in the wider market area. The wording is overly aspirational given the limitations of the role of the strategic site.	Suggested changes: The wording should be clarified to ensure that the use of the site is limited to logistics only. An amendment would make the different elements of the Plan consistent.	Officer comments: The 2022 January Addendum amends paragraph 4.4. This is considered to appropriately address the matters raised by this representation.
Representation Reference: REF009.1 Name: Fisher German on behalf of land owner	Refers to: Vision and Objectives – Paragraph 4.7	Legal compliance and soundness: Legal compliance - not specified. Plan is unsound. Plan does not comply with Duty to Co-operate	Comments: The Vision in respect of Harworth & Bircotes (also a Main Town) does not mention housing growth.	Suggested changes: The emerging Local Plan Vision and Policies should be amended to include reference to further housing growth coming forward within Harworth & Bircotes.	Officer comments: The Local Plan does not provide for any housing growth in Harworth & Bircotes in the plan period. But it is recognised that the town will experience growth from consented schemes. On that basis the May 2022 Second Addendum amends the first sentence of

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
					paragraph 4.7 accordingly.
Representation Reference: REF010.1 Name: Severn Trent	Refers to: Paragraph 4.14 of Bassetlaw Vision and Objectives	Legal compliance and soundness: Legal compliance of plan - not specified. Soundness of plan - not specified. Compliance of plan with Duty to Co-operate - not specified.	Comments: Supportive of paragraph 4.14, which highlights the need to manage climate change and flood risk through the use of sustainable drainage systems.	Suggested changes: None	Officer comments: Noted
Representation Reference: REF023.1 Name: Muller Property Group on behalf of land owner	Refers to: Strategic Objectives 1, 2 and 3	Legal compliance and soundness: Plan is legally compliant and sound. Plan complies with Duty to Cooperate.	Comments: Support Strategic Objectives, specifically 1, 2 and 3 which seek to direct development to sustainable locations and to ensure that sufficient land is made available to meet housing and employment needs over the Plan Period. Have reservations about the intention to pursue a Garden Village within this Plan Period (Objective 5)	Suggested changes: None	Officer comments: The May 2022 Second Addendum withdraws the Garden Village from the Local Plan.

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name: Spawforths on behalf of the landowner	Vision and Objectives	Plan is not legally compliant, sound and it does not comply with the Duty to Cooperate.	The Vision is only to 2037. The 2021 NPPF indicates that where “larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery”. Aware that the Publication Local Plan suggests a 30 year Vision within the Garden Village Vision Statement; this should be within the Local Plan, which goes up to 2037. The Plan period should fully encompass the delivery of the Garden Village to at least 2053, a minimum of 30 years from the date of adoption. The Local Plan is unlikely to be adopted until 2023 at the earliest; the Plan period for all other aspects should be a minimum of 15 years from the date of adoption, at least 2038.	The Council should extend the Local Plan period to reflect the Garden Village and be a minimum of 30 years.	In the case of larger scale developments, such as new settlements or significant extensions the NPPF requires policies to be set within a vision that looks ahead for at least 30 years, it does not require policies to plan ahead for 30 years. The May 2022 Second Addendum withdraws the Garden Village from the Local Plan. The January 2022 Addendum extended the plan period to 2038 to ensure the plan period is 15 years from the expected date of adoption in 2023.
Name: Gladmans	Vision and Strategic Objectives	Plan is legally compliant and complies with Duty to Cooperate.	Support the vision and objectives which provide a positive and proactive approach to future development in Bassetlaw to 2037. Strategic Objectives SO3 and SO4, highlight the need to prioritise development on previously developed land	Include Land at Bevercotes Colliery as a Priority Regeneration Area in the Bassetlaw Local Plan	The January 2022 Addendum proposes to allocate the Former Bevercotes Colliery site under Policy ST7 as a

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name:		Plan is unsound.	that is capable of sustainable economic growth and offering wider benefits to the A1 corridor. The redevelopment of the former Bevercotes Colliery will remediate and reclaim a significant brownfield site and would align with the strategic objectives. The site's planning history can deliver redevelopment alongside new and enhanced habitats for nature and wildlife.		general employment site (EMO08a).
Representation Reference: REF045.1 Name: Agent on behalf of land owner	Refers to: Strategic Objectives: Small rural settlements	Legal compliance and soundness: Plan is legally compliant and complies with the Duty to Cooperate. Plan is Unsound.	Comments: The strategic objectives contain goals to ensure that more rural areas of Bassetlaw are allowed to thrive whilst seeking to encourage economic growth across the District. Providing a choice of housing land must provide choice in locations and sizes. The market must be kept buoyant for developers of all sizes to bring sites forward. The local economy is clearly a priority within the District for the local economy to support itself. Local centres must be allowed to grow economically and physically to ensure their vitality otherwise will lose residents and businesses to those locations where growth is promoted. This is closely aligned with Objective 14 regarding physical infrastructure.	Suggested changes: None	Officer comments: Noted
Representation Reference: NRF-REF026.2	Refers to: Bassetlaw Garden Village Vision	Legal compliance and soundness: Legal compliance	Comments: Support the ambitious vision and corresponding 14 strategic objectives especially in respect of the promotion of	Suggested changes: None	Officer comments: The May 2022 Second Addendum withdraws the Bassetlaw Garden

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
<p>Name: Savills on behalf of R Girdham and the Mason Family</p>	<p>Statement and Vision Objective 14</p>	<p>of plan - not specified.</p> <p>Soundness of plan - not specified.</p> <p>Compliance of plan with Duty to Co-operate - not specified.</p>	<p>healthy lifestyles, enhanced biodiversity and low carbon environment as these fully align with our client's aspirations for the Garden Village. Support reference to the Garden Village in the context of the wider district's vision and spatial strategy, especially the focus on the new transport hub, distinctive employment offer, healthy, green agenda and quality of place.</p>		<p>Village from the Local Plan, following the decision of one landowner to withdraw their land from the process.</p>

A Spatial Strategy for Bassetlaw

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name: Representation Reference: 1935123.1 Name: Sheffield City Council	Refers to: Paragraph 5.1.15	Legal compliance and soundness: Legal compliance not specified. Plan is unsound. Plan does not comply with Duty to Co-operate.	Comments: The justification for the inclusion of the Apleyhead site as an allocation is solely to meet an identified need for logistics in the wider market area, and not to improve the quality of jobs.	Suggested changes: The different elements of the Plan need to be consistent in order to be sound.	Officer comments: The January 2022 Addendum amends Policy ST1 and the supporting text. It is considered that this will provide consistency in approach to Apleyhead.
Representation Reference: 1935123.2 Name: Sheffield City Council	Refers to: Policy ST1: Bassetlaw's Spatial Strategy	Legal compliance and soundness: Legal compliance not specified. Plan is unsound. Plan does not comply with Duty to Co-operate.	Comments: The standard methodology produces a Local Housing Need figure of 288 per annum. The plan is proposing to provide more than double that baseline, a figure that is not supported by the evidence.	Suggested changes: The housing and employment allocations should be reduced to a level supported by the evidence base in order to be considered sound.	Officer comments: National policy states that the standard method is a minimum starting point for assessing housing need. National policy states that the housing requirement can exceed that. The HEDNA, 2020 assessed the housing need based upon modelling of forecasted economic growth. The 2022 HEDNA Addendum maintains that approach and informs the updated position to the spatial strategy taken in the May 2022 Second Addendum.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
					It is considered this evidence provides a robust, up to date basis to inform the approach taken by Policy ST1.
Representation Reference: 1935123.3 Name: Sheffield City Council	Refers to: Policy ST1: Bassetlaw's Spatial Strategy	Legal compliance and soundness: Legal compliance not specified. Plan is unsound. Plan does not comply with Duty to Co-operate	Comments: The proposed allocation of 169 hectares (not including an additional 118 hectares at the Strategic Employment Site) is twice the 84 hectares that is needed according to the Housing and Economic Development Needs Assessment 2020.	Suggested changes: The housing and employment allocations should be reduced to a level supported by the evidence base in order to be considered sound.	Officer comments: The approach taken to the provision of general employment land in the Local Plan and Housing and Economic Development Needs Assessment 2020 is considered to be consistent with national Planning Practice Guidance. The 2022 HEDNA Addendum informs the amended approach taken in the May 2022 Second Addendum to the spatial strategy and the Garden Village.

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name: Representation Reference: 1945074.1 Name: Inovo Consulting on behalf of Hallam Land Management	Refers to: Paragraph 5.1.9 of supporting text for POLICY ST1: Bassetlaw's Spatial Strategy	Legal compliance and soundness: Plan is legally compliant. Plan is sound. Plan complies with Duty to Co-operate.	Comments: Support the references in para. 5.1.9 in relation to facilitating a step change in the District's economy and aligning economic growth with the housing offer. Support para. 5.1.19 that pursuing a housing target based purely on Government household projections would provide an insufficient number of dwellings to support economic growth objectives.	Suggested changes: None	Officer comments: Noted
Representation Reference: 1945074.2 Name: Inovo Consulting on behalf of Hallam Land Management	Refers to: Paragraph 2 of POLICY ST1: Bassetlaw's Spatial Strategy	Legal compliance and soundness: Plan is legally compliant. Plan is sound. Plan complies with Duty to Co-operate.	Comments: Support proposed provision of land for a minimum of 10,047 dwellings at an annual delivery of 591 dwellings per annum and the distribution of housing development with the settlement hierarchy identified in ST1:2 and particularly (a) 2569 dwellings in the Worksop Outer Area.	Suggested changes: None	Officer comments: Noted.
Representation Reference: 1945074.3 Name: Inovo Consulting on behalf of Hallam Land Management	Refers to: Paragraph 5 of POLICY ST1: Bassetlaw's Spatial Strategy	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: Support ST1:5 in terms of the provision of at least 169 hectares of general employment land in the plan period.	Suggested changes: None	Officer comments: Noted.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
		Plan complies with Duty to Co-operate.			
Representation Reference: 1945106.2 Name: BDC and County Councillor	Refers to: POLICY ST1 - housing requirement figure.	Legal compliance and soundness: Plan is not legally compliant, sound or complies with Duty to Cooperate.	Comments: Housing numbers of almost 10,000 homes due to government requirements is untrue. Using the national formulae the requirement is only 4,896. The Plan is not sound.	Suggested changes: Bassetlaw Garden Village is planned for an additional 3,000 plus homes post 2037. Reduce developments elsewhere and build 4,000 in the period to 2037. It would attract more positive funding from government and developers due to the scale of a project. The current plan to build 500 homes at Bassetlaw Garden Village to 2037 is insufficiently large to make it economically viable given its location. Even Ordsall South would benefit from being larger with	Officer comments: The Local Plan does not state that the housing numbers are a Government requirement. National policy states that the standard method is a minimum starting point for assessing housing need. National planning policy states that the housing requirement can exceed that. The HEDNA, 2020 assessed the housing need based upon modelling of forecasted economic growth. The 2022 HEDNA Addendum maintains that approach and informs the updated position to the spatial strategy taken in the May 2022 Second Addendum. It is considered this provides a robust, up

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
				the correct infrastructure	to date basis to inform the approach taken by Policy ST1. The Second Addendum withdraws the Garden Village from the Local Plan.
Representation Reference: 1945371.2 Name: Bassetlaw Conservative Councillor Group	Refers to: POLICY ST1 - housing requirement figure.	Legal compliance and soundness: Plan is not legally compliant, sound or complies with Duty to Cooperate.	Comments: The approval of 10,000 new houses in the local plan is excessive and way beyond requirements. Following government guidelines we only need to approve 4,896 houses. The government did NOT instruct BDC on the number of houses to build. The government did NOT decide the location of new housing in our district.	Suggested changes: Review the calculation of Bassetlaw's housing requirement.	Officer comments: The Local Plan does not states that the housing numbers are a Government requirement. National policy states that the standard method is a minimum starting point for assessing housing need. National policy states that the housing requirement can exceed that. The HEDNA, 2020 assessed the housing need based upon modelling of forecasted economic growth. The 2022 HEDNA Addendum maintains that approach and informs the updated position to the spatial strategy taken in the May 2022 Second Addendum. It is considered this provides

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name:					a robust, up to date basis to inform the approach taken by Policy ST1.
Representation Reference: 1946014.1 Name: County Cllr	Refers to: POLICY ST1: Bassetlaw's Spatial Strategy	Legal compliance and soundness: Legal compliance of plan - not specified. Plan is unsound. Plan does not comply with Duty to Co-operate.	Comments: Bassetlaw's resources, services, including schools, GP Practices, hospitals, care system are already stretched and struggling to cope with current demand, there is no plan to mitigate the lack of resources.	Suggested changes: Less new homes, BDC are proposing to build more than double the number required by government.	Officer comments: National policy states that the standard method is a minimum starting point for assessing housing need. National policy states that the housing requirement can exceed that. It is considered the Local Plan and the IDP, informed by infrastructure partners views, appropriately provides for infrastructure required to support Local Plan growth.
Representation Reference: 1946034.1 Name: Resident	Refers to: POLICY ST1: Bassetlaw's Spatial Strategy	Legal compliance and soundness: Plan is not legally compliant. Plan is unsound. Plan does not comply with Duty to Co-operate.	Comments: The density of new housing is not equally shared across the district.	Suggested changes: Why build thousands of houses in a small area rather than spread them across all areas and villages?	Officer comments: Housing growth is distributed according to the settlement hierarchy based upon ability to deliver sustainable development and growth, appropriate to the size of settlements, and availability of services and facilities. National policy

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
					requires development makes optimal use of each site.
Representation Reference: 1946117.1 Name: Resident	Refers to: POLICY ST1: Bassetlaw's Spatial Strategy	Legal compliance and soundness: Legal compliance of plan - not specified Plan is unsound. Plan does not comply with Duty to Co-operate.	Comments: Inflated, unnecessary number of new housing and fails to ensure adequate infrastructure to support it. Not consistent with government housing policy. The very large housing numbers related to expected employment growth is difficult to predict. The consultancy report published by the Council has not taken into account the effects of the pandemic or Brexit. Public views not considered when revising the plan.	Suggested changes: More accurate numbers are required.	Officer comments: National policy states that the standard method is a minimum starting point for assessing housing need. National policy states that the housing requirement can exceed it. The HEDNA, 2020 assessed the housing need based upon modelling of forecasted economic growth. The 2022 HEDNA Addendum maintains that approach and informs the updated position to the spatial strategy taken in the May 2022 Second Addendum. It is considered this evidence provides a robust, up to date basis to inform the approach taken by Policy ST1 and makes an allowance for Brexit and the pandemic. It is considered the Local Plan

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
					and the IDP, informed by infrastructure partners views, appropriately provides for infrastructure required to support Local Plan growth. All comments made at each consultation stage have been responded to and where appropriate have informed the next version of the Plan.
Representation Reference: 1946124.1 Name: Rampton and Woodbeck Parish Council	Refers to: POLICY ST1: Bassetlaw's Spatial Strategy	Legal compliance and soundness: Legal compliance of plan - not specified. Plan is unsound. Compliance with Duty to Co-operate - not specified.	Comments: Housing requirement is inflated compared to Government figures. Have the housing numbers been increased to reflect unmet demand in neighbouring boroughs and districts?	Suggested changes: None	Officer comments: National policy states that the standard method is a minimum starting point for assessing housing need. National policy states that the housing requirement figure can exceed that. The HEDNA, 2020 assessed the housing need based upon modelling of forecasted economic growth. The 2022 HEDNA Addendum maintains that approach and informs the updated position to the spatial strategy taken in the May 2022 Second Addendum.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
					It is considered this provides a robust, up to date basis to inform the approach taken by Policy ST1. Bassetlaw has not agreed to take unmet housing need from neighbouring authorities, evidenced by statements of common ground signed by relevant authorities.
Representation Reference: REF1946246.1 Name: Barton Wilmore on behalf of Heyford Developments	Refers to: POLICY ST1 – Bassetlaw’s Spatial Strategy	Legal compliance and soundness: Plan complies with the Duty to Cooperate. Plan is legally compliant. Plan is unsound.	Comments: Insufficient growth is directed to Blyth, the Plan will not deliver balanced growth spread across the more sustainable rural settlements.	Suggested changes: The difference between the Plan’s total requirement (10,047) and the cumulative total of the draft allocations (10,884) should be explained. Clarification is required as to what level of growth will deliver for each Rural Settlement (whether Neighbourhood Plan allocations have been double counted) and what the contribution	Officer comments: The January 2022 Addendum extends the plan period to 2038. The housing land supply position has been updated to the 31 March 2022 base date. The total available supply is 12,551. The requirement is 10,476. Only about 27% (3377) of the supply will come from new allocations. There has not been a double counting of NP allocations – it is suggested that commitments on small sites in the supply (9 or less

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
				<p>is to the overall housing requirement.</p> <p>Settlements should be updated guard against non-delivery of housing through Neighbourhood Plans (see Policy ST2).</p> <p>Further growth should be directed to the sustainable settlement of Blyth.</p>	<p> dwellings) have not been considered in the representation. The Large Rural Settlements will contribute significantly towards meeting the need from existing permissions; as such there is no requirement to allocate additional sites in the rural area. The Whole Plan Viability Assessment considers the allocations deliverable. The May 2022 Second Addendum included an updated housing land supply position, showing at 31 March 2022 a 17% buffer in the supply. This provides sufficient flexibility. At 31 March 2022 there were 49 dwellings with extant planning permission in Blyth. Between the 1 April 2020 and the 31 March 2022 there were 17 completions. There are 55 dwellings allocated in the</p>

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
					neighbourhood plan without planning permission. This makes a total provision of 121 dwellings for Blyth. This satisfies the growth requirement.
Representation Reference: 1946488.1 Name: County Cllr	Refers to: POLICY ST1: Bassetlaw's Spatial Strategy	Legal compliance and soundness: Legal compliance of plan - not specified. Plan is unsound. Compliance with Duty to Co-operate - not specified.	Comments: Cannot find a basis for how the over 10,000 homes being planned by BDC is in accordance with sustainable development. The plan has not taken in to account reasonable alternatives for housing allocations. Why Peaks Hill Farm was chosen over others?	Suggested changes: Justification with respect to housing numbers being sustainable (there are too many and no evidence for the number reached), and alternative site allocations.	Officer comments: National policy states that the standard method is a minimum starting point for assessing housing need. National policy states that the housing requirement can exceed it. The HEDNA, 2020 assessed the housing need based upon modelling of forecasted economic growth. The 2022 HEDNA Addendum maintains that approach and informs the updated position to the spatial strategy taken in the May 2022 Second Addendum. It is considered this provides a robust, up to date basis to inform the approach taken by Policy

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
					ST1. It is considered the Sustainability Appraisal, Land Availability Assessment and Site Selection Methodology are consistent with national policy and provide a robust basis by which to determine the most sustainable sites to be allocated to meet the identified housing need in the Plan.
Representation Reference: 1946642.1 Name: Resident	Refers to: POLICY ST1: Bassetlaw's Spatial Strategy	Legal compliance and soundness: Plan is not legally compliant. Plan is unsound. Plan does not comply with Duty to Co-operate.	Comments: Excessive and unsustainable level of dwellings which the Plan contains combined with no coherent strategy to ensure adequate infrastructure means not only will there be a significant impact on the environmental sustainability of this plan but also on the economic and social sustainability of the communities.	Suggested changes: Housing numbers should be reduced to be more in line with the Government target.	Officer comments: National policy states that the standard method is a minimum starting point for assessing housing need. National policy states that the housing requirement can exceed it. The HEDNA, 2020 assessed the housing need based upon modelling of forecasted economic growth. The 2022 HEDNA Addendum maintains that approach and informs the updated position to the spatial

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
					strategy taken in the May 2022 Second Addendum. It is considered this provides a robust, up to date basis to inform the approach taken by Policy ST1. It is considered the Local Plan and the IDP, informed by infrastructure partners views, appropriately provides for infrastructure and manages potential environmental, social and economic impacts from Local Plan growth.
Representation Reference: 1946687.1 Name: Resident	Refers to: POLICY ST1: Bassetlaw's Spatial Strategy	Legal compliance and soundness: Legal compliance of plan - not specified. Plan is unsound. Plan does not comply with Duty to Co-operate.	Comments: The plan cannot be deemed 'sound' when the basic premise that it uses to calculate the number of houses needed is hope & aspiration for employment opportunities. There is a definite need for some genuinely affordable housing but not in the numbers being proposed.	Suggested changes: Revisit the calculations for 'required' houses and provide real evidence of real need to go beyond the 288 required number.	Officer comments: National policy states that the standard method is a minimum starting point for assessing housing need. National policy states that the housing requirement can exceed it. The HEDNA, 2020 assessed the housing need based upon modelling of forecasted economic growth. The 2022 HEDNA Addendum

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
					maintains that approach and informs the updated position to the spatial strategy taken in the May 2022 Second Addendum. This also highlights that the district has a need for 214 affordable rented units per annum. It is considered this evidence provides a robust, up to date basis to inform the approach taken by Policy ST1.
Representation Reference: 1946689.1 Name: BDC Cllr	Refers to: POLICY ST1: Bassetlaw's Spatial Strategy	Legal compliance and soundness: Legal compliance of plan - not specified. Plan is unsound. Compliance with Duty to Co-operate - not specified.	Comments: The Local Plan is unsound due to the uncertainty of what appears to be inflated numbers. This level of growth is unrealistic considering the lack of planned infrastructure.	Suggested changes: The employment growth targets need to be revisited to ensure that they are realistic. If the numbers are not found to be unrealistic, then more consideration needs to be given to local infrastructure needs to ensure a plan that works for all of Bassetlaw.	Officer comments: National policy states that the standard method is a minimum starting point for assessing housing need. National policy states that the housing requirement can exceed it. The HEDNA, 2020 assessed the housing need based upon modelling of forecasted economic growth. The 2022 HEDNA Addendum maintains that approach and informs the updated position to the spatial

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name:					strategy taken in the May 2022 Second Addendum. It is considered this provides a robust, up to date basis to inform the approach taken by Policy ST1. It is considered the Local Plan and the IDP, informed by infrastructure partners views, appropriately provides for infrastructure required to support Local Plan growth.
Representation Reference: REF008.1 Name: BDC and County Councillor	Refers to: POLICY ST1: Bassetlaw's Spatial Strategy	Legal compliance and soundness: Legal compliance and soundness - not specified. Compliance with Duty to Co-operate - not specified.	Comments: In the initial draft plan a 25% increase in building in villages was suggested. In this version that figure has been reduced, following community and individual consultation responses which were critical of this figure.	Suggested changes: It is a good thing that this proposal has since been removed from the plan.	Officer comments: Noted
Representation Reference: REF008.2 Name: BDC and County Councillor	Refers to: POLICY ST1 – Housing Target of 591 dwellings/year –	Legal compliance and soundness: Legal compliance and soundness - not specified.	Comments: The Bassetlaw plan housing requirement is 280 house builds a year and not 591. There is no reason to increase the population in Bassetlaw for them to commute back to the main employment centres at Doncaster, Sheffield, Nottingham, and Lincoln.	Suggested changes: The existing Bassetlaw population is likely to be sufficient for the increases in employment expected (including fusion	Officer comments: National policy states that the 288 standard method is a minimum starting point for assessing housing need. National policy states that the housing requirement

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
	Paragraph 5.1.21	Compliance with Duty to Co-operate - not specified.		station at West Burton).	can exceed it. The HEDNA, 2020 assessed the housing need based upon modelling of forecasted economic growth. The 2022 HEDNA Addendum maintains that approach and informs the updated position to the spatial strategy taken in the May 2022 Second Addendum. Employment growth in Bassetlaw would reduce outward commuting, as more people could live and work in the district.
Representation Reference: REF008.3 Name: BDC and County Councillor	Refers to: POLICY ST1 – proposed employment growth. Paragraphs 5.1.14 and 5.1.15	Legal compliance and soundness: Legal compliance and soundness - not specified. Compliance with Duty to Co-operate - not specified.	Comments: There are plenty of employment opportunities in Bassetlaw, the surrounding districts and regions, it is obscure why the extra house building will make a significant contribution. Digital transformation, Tourism and Leisure are areas where growth is likely to occur. The proposed warehousing is not likely to need extra staff. The increase in real growth is unlikely to benefit people and businesses in the area.	Suggested changes: None	Officer comments: National policy requires housebuilding and employment growth to align. The Local Plan identifies the key D2N2 growth sectors which includes digital transformation in logistics. The HEDNA 2020 and the 2022 Addendum identify that the level of employment land with

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
					planning permission identified by the Local Plan will generate additional jobs.
Representation Reference: REF008.4 Name: BDC and County Councillor	Refers to: Housing Growth in Retford Paragraph 5.1.47	Legal compliance and soundness: Legal compliance and soundness - not specified. Compliance with Duty to Co-operate - not specified.	Comments: Retford is a market town, which still has original character. The proposals are likely to transform Retford further as a commuter dormitory, but with a congested transport and highways system, creating difficulties for existing residents.	Suggested changes: None	Officer comments: The Local Plan allocates new employment land in Retford, and also protects several existing employment sites for their continued operation for employment use. The Plan takes a positive approach to the town centre. All can provide employment for residents so that people can live and work in the town. It is considered the Local Plan and the IDP, informed by infrastructure partners views, appropriately provides for infrastructure required to support Local Plan growth in Retford.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
<p>Representation Reference: REF009.2</p> <p>Name: Fisher German on behalf of land owner</p>	<p>Refers to: POLICY ST1 Supporting text Paragraph 5.1.49</p>	<p>Legal compliance and soundness: Legal compliance and compliance with Duty to Cooperate - not specified.</p> <p>Plan is unsound.</p>	<p>Comments: The Council's proposed approach to not direct any further growth at Harworth & Bircotes as a result of the existing commitments for the town is not supported.</p>	<p>Suggested changes: Allocating more homes to Harworth & Bircotes will enable the Plan to encourage further growth. Not allocating homes may stifle development in years 11 – 15 of the plan period. To ensure the ongoing regeneration of Harworth & Bircotes it will be important to provide enough homes.</p>	<p>Officer comments: The Local Plan Trajectory shows sufficient delivery (Harworth & Bircotes has seen significant housing being delivered between 2019-2022 with over 369 completions. As at 31 March 2022 there were 2,006 existing deliverable commitments in Harworth & Bircotes. This includes an outline planning permission (September 2021) for a re-profiled Harworth Colliery site. The 1,300 dwellings are in addition to the consented phases under construction. At least 1,133 dwellings from this permission are deliverable within the Plan period, thereby adding to the District's housing supply. There is therefore no requirement to allocate additional housing sites.</p>

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name: Representation Reference: REF011.1 Name: Lound Parish Council	Refers to: POLICY ST1: Bassetlaw's Spatial Strategy	Legal compliance and soundness: Plan is legally compliant. Plan is unsound. Plan complies with Duty to Co-operate.	Comments: Welcome the Publication Version Plan. Noted that the Housing Growth Requirement for Lound remains at 5%, which equates to 10 new dwellings. Consultation shows that the village overwhelmingly believes that this is a sustainable and proportionate contribution.	Suggested changes: None	Officer comments: Noted
Representation Reference: REF012.8 Name: Grace Machin on behalf of land owner	Refers to: POLICY ST1 Spatial Strategy Development Boundary	Legal compliance and soundness: Plan is legally compliant and complies with the Duty to Cooperate. Plan is unsound.	Comments: Within the Local Plan – Policy ST1 – Bassetlaw's Spatial Strategy makes no reference to a Development Boundary Policy. This is confusing and unsound. Refers to 2014/00213/OUT Committee Report for site identification purposes. Committed housing sites on the edge of Worksop which are under construction should be in the Development Boundary. Not crossing a site as is the case with land to the South of Gateford Rd and North of Claylands Avenue. It is illogical.	Suggested changes: Local Plan should reference committed housing sites setting out the level of new housing to be delivered on each site.	Officer comments: It is acknowledged that the settlement boundary for Worksop inadvertently crosses Land South of Gateford Road (14/00213/OUT). All of the committed site should be shown within the Worksop settlement boundary as development has commenced. This will be identified as a proposed suggested change to the Policies Map. The May 2022 Second Addendum clarifies the approach taken to development

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
					boundaries to further address this matter.
Representation Reference: REF014.1 Name: National Trust	Refers to: POLICY ST1: Bassetlaw's Spatial Strategy	Legal compliance and soundness: Legal compliance of plan - not specified. Plan is unsound. Compliance with Duty to Co-operate - not specified.	Comments: This policy is unsound. The key driver for the inflated housing growth in Part 2 is the 'supply' of employment land, including a proposed Strategic Employment Allocation for logistics on greenfield land at Apleyhead. This overall approach necessitates the large-scale release of greenfield land, which is not sustainable. The proposed allocations in Part 5 are excessive having regard to evidenced employment need (HEDNA 2020), the impact on regeneration of other sites in Bassetlaw and further afield, and may generate unsustainable transport patterns. The proposed strategy is not justified.	Suggested changes: The assessment of housing and employment needs should be reviewed to achieve reduced targets and unnecessary greenfield land allocations.	Officer comments National policy states that the standard method is a minimum starting point for assessing housing need. National policy states that the housing requirement can exceed that. The HEDNA, 2020 and the 2022 Addendum use a completions trend scenario in terms of jobs assumptions to reflect the level of committed general employment sites in the district. This has consequential implications for the housing requirement, which national planning guidance asks aligns with jobs growth. The Apleyhead site is identified to meet a regional/sub-regional need for logistics only.

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name: Representation Reference: REF017.1 Name: Lound Neighbourhood Plan Steering Group	Refers to: POLICY ST1: Bassetlaw's Spatial Strategy	Legal compliance and soundness: Plan is legally compliant. Plan is unsound. Plan complies with Duty to Co-operate.	Comments: Lound Neighbourhood Plan Steering Group welcomes the Publication Version Plan. It is noted that the Housing Growth Requirement for Lound remains at 5%, which equates to 10 new dwellings. This is considered proportionate.	Suggested changes: None	Officer comments: Noted
Representation Reference: REF019.1 Name: Lound Neighbourhood Plan Steering Group	Refers to: POLICY ST1: Bassetlaw's Spatial Strategy	Legal compliance and soundness: Plan is legally compliant. Plan is unsound. Plan complies with Duty to Co-operate.	Comments: It is noted that the Housing Growth Requirement for Lound remains at 5%, which equates to 10 new dwellings. Consultation shows that the village overwhelmingly believes that this is a sustainable and proportionate contribution.	Suggested changes: None	Officer comments: Noted
Representation Reference: REF020.1 Name: Town Planning.co.uk on behalf of consultee	Refers to: POLICY ST1: Bassetlaw's Spatial Strategy Point 2	Legal compliance and soundness: Plan is legally compliant and complies with the Duty To Cooperate.	Comments: The higher housing provision for 2020 to 2037 has resulted in the allocation of unsuitable sites for which there is no need, such as HS14 in Tuxford. This is 2.5 times the number of dwellings that the standardised methodology calculates.	Suggested changes: Policy ST1 should be amended to reflect the Government's standardised methodology. If an employment-led growth approach is pursued then the	Officer comments: National policy states that the standard method is a minimum starting point for assessing housing need. National policy states that the housing requirement can exceed that. The HEDNA, 2020 assessed the

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
		Plan is unsound.		spatial strategy for housing should more align to the spatial strategy for employment land; particularly in relation to the uplift. The employment allocations are to be based at Apleyhead Junction and site allocations at the Garden Village and High Marnham.	housing need based upon modelling of forecasted economic growth. The 2022 HEDNA Addendum maintains that approach and informs the updated position to the spatial strategy taken in the May 2022 Second Addendum. The 2022 January Addendum no longer allocates High Marnham for employment and the May 2022 Second Addendum withdraws the Garden Village from the Local Plan.
Representation Reference: REF020.2 Name: Town Planning.co.uk on behalf of consultee	Refers to: POLICY ST1: Spatial Strategy Point 2. Section b)	Legal compliance and soundness: Plan is legally compliant and complies with the Duty To Cooperate. Plan is unsound.	Comments: Policy ST1 proposes 1,496 dwellings for the 'Large Rural Settlements'. This is based on existing commitments and the single allocation of 75 dwellings proposed on site HS14 in Tuxford. The removal of HS14 would not undermine the spatial strategy neither would it result in the strategic housing requirement not being met. Based on a plan level of 591 dwellings per annum the demonstrable housing land supply with a 5% buffer would still amount to 5.14-years supply based on existing	Suggested changes: Policy ST1 should be amended to be in line with Government standardised methodology to appropriately reflect paragraph 73 of the NPPF.	Officer comments: At 20% Tuxford's requirement is 250 dwellings during the Plan period. In 2021/22 there were 84 completions, with 80 being delivered from the Ashvale Road site (19/01165/RES). There were no completions in the year 2020/21. The proposed allocation at

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>commitments, before any new allocations are added. No need arises for allocations to be released early in the plan period. The Bassetlaw Rural Monitoring Table (August 2021) indicates that 105 dwellings are committed in Tuxford. Tuxford is a modest sized settlement of 2,649 in population. The existing commitments in Tuxford is proportionate to the existing size and role that Tuxford plays in the district. To over-deliver housing this should be delivered in the strategic sites rather than to existing settlements. In the first two years of the plan period Tuxford has 42% of its housing requirement committed. Given this there is no requirement for the Local Plan to allocate a site to be delivered early in the plan period. The commitments in Tuxford will see growth of 8.4% in the number of dwellings in a short period of time. It would not be unreasonable for any additional allocations. The overall housing figure were reduced to 288 dwellings per annum as the MHCLG methodology suggests then the Tuxford pro-rata figure would reduce from 250 dwellings to 122 dwellings across the plan period. The remaining housing to be found would be 17 dwellings. The overall housing figure for Bassetlaw is directly relevant as to whether any additional housing allocations need to be found for Tuxford. There</p>		<p>Tuxford will contribute to meeting the identified housing requirement of that large village providing an opportunity to support local services. The Land Availability Assessment 2022 identifies the site as suitable to contribute to the housing requirement in Tuxford. The site is identified as available and deliverable from 2026.</p>

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name:			are other reasonable alternative sites elsewhere in Tuxford that would be more appropriate.		
Representation Reference: REF022.1 Name: Lound Neighbourhood Plan Steering Group	Refers to: POLICY ST1: Bassetlaw's Spatial Strategy	Legal compliance and soundness: Plan is legally compliant. Plan is unsound. Plan complies with Duty to Co-operate.	Comments: It is noted that the Housing Growth Requirement for Lound remains at 5%, which equates to 10 new dwellings. Consultation shows that the village overwhelmingly believes that this is a sustainable and proportionate contribution.	Suggested changes: None	Officer comments: Noted
Representation Reference: REF023.3 Name: Muller Property Group on behalf of land owner	Refers to: POLICY ST1 supporting text Paragraph 5.1.9	Legal compliance and soundness: Plan is legally compliant and complies with the Duty to Cooperate. Plan is unsound.	Comments: Paragraph 5.1.9 states that the spatial strategy promotes a 'step change' in the District's economy and that the Council are seeking to retain employment locally, provide opportunities for better paid, higher skilled jobs and increase productivity. In doing so, the strategy seeks to align itself with the priorities of the D2N2 Recovery and Growth Strategy. MPG are fully supportive of this economic led, jobs growth strategy that is proposed by the Council.	Suggested changes: Do not agree that the selection of sites to deliver the growth, particularly in Retford, are correct. The Council should allocate the land to the north of Retford for residential development instead of the Garden Village.	Officer comments: The Local Plan Housing Trajectory (Appendix 3) indicates a rolling five year housing land supply during the plan period based upon a 10% buffer. About two-thirds will come from dwellings completed, committed sites, allocations in neighbourhood plans and windfalls. New allocations constitute the remainder. The May 2022 Second Addendum withdraws the

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
					Garden Village from the Local Plan. The May 2022 Second Addendum included an updated housing land supply position, showing at 31 March 2022 a 17% buffer in the supply. Further allocations are not considered necessary. It is considered the Sustainability Appraisal, Land Availability Assessment and Site Selection Methodology are consistent with national policy and provide a robust basis to determine the most sustainable sites to be allocated to meet the identified housing need.
Representation Reference: REF023.4 Name: Muller Property Group on behalf of land	Refers to: POLICY ST1 supporting text Paragraph 5.1.10	Legal compliance and soundness: Plan is legally compliant and complies with the Duty to Cooperate. Plan is unsound.	Comments: Support the Council's stated objective of securing economic growth and job creation and vis a vis the need to plan for significantly more dwellings than the minimum housing need as identified by the standard method. In seeking to deliver this level of housing growth, it is	Suggested changes: Do not agree that the selection of sites to deliver the growth, particularly in Retford. The Council should allocate the land to the north of Retford	Officer comments: The May 2022 Second Addendum withdraws the Garden Village from the Local Plan. The May 2022 Second Addendum included an updated housing land supply

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
owner			essential that the Council identifies the right sites, in the right location.	instead for the Garden Village.	position, showing at 31 March 2022 a 17% buffer in the supply. Further allocations are not considered necessary. It is considered the Sustainability Appraisal, Land Availability Assessment and Site Selection Methodology are consistent with national policy and provide a robust basis to determine the most sustainable sites to be allocated to meet the identified housing need.
Representation Reference: REF023.5 Name: Muller Property Group on behalf of land owner	Refers to: POLICY ST1: Bassetlaw's Spatial Strategy	Legal compliance and soundness: Plan is legally compliant and complies with the Duty to Cooperate. Plan is unsound.	Comments: Support the focus on delivering sustainable development and growth, appropriate to the size of each settlement to meet the evidenced need for new homes and jobs, regenerate the District's town centre. Support the provision of 591 dpa. Support the provision of 2,128 dwellings in Retford. Object to the provision of 500 dwellings at the Retford Garden Village in the current plan period. Support the creation of at least 9,735 jobs	Suggested changes: Generally consider that the strategy is acceptable. Do not agree that the selection of sites to deliver the growth, particularly in Retford, are the correct ones. The Council should allocate the land to the north of Retford	Officer Comments: The May 2022 Second Addendum withdraws the Garden Village from the Local Plan. The May 2022 Second Addendum included an updated housing land supply position, showing at 31 March 2022 a 17% buffer in the supply. Further allocations are not considered necessary. It is

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name:				instead of the Garden Village.	considered the Sustainability Appraisal, Land Availability Assessment and Site Selection Methodology are consistent with national policy and provide a robust basis to determine the most sustainable sites to be allocated to meet the identified housing need.
Representation Reference: REF024.1 Name: Resident	Refers to: POLICY ST1: Bassetlaw's Spatial Strategy	Legal compliance and soundness: Plan is legally compliant. Plan is unsound. Plan complies with Duty to Co-operate.	Comments: It is noted that the Housing Growth Requirement for Lound remains at 5%, which equates to 10 new dwellings. Consultation shows that the village overwhelmingly believes that this is a sustainable and proportionate contribution.	Suggested changes: None	Officer comments: Noted
Representation Reference: REF025.1 Name: Resident	Refers to: POLICY ST1: Bassetlaw's Spatial Strategy	Legal compliance and soundness: Legal compliance of plan - not specified. Plan is unsound.	Comments: A huge volume of new housing has already been developed in and around Worksop in recent years e.g. in the Gateford area. The Council has not clearly explained why it believes thousands of additional houses are required, and why these should be built on greenfield sites.	Suggested changes: The plan needs to explain why developing such a huge volume of housing is consistent with National Policy and Central	Officer comments: National policy states that the standard method is a minimum starting point for assessing housing need. National policy states that the housing requirement can exceed that. The

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
		Compliance with Duty to Co-operate - not specified.		Government guidelines.	HEDNA, 2020 assessed the housing need based upon modelling of forecasted economic growth. The 2022 HEDNA Addendum maintains that approach and informs the updated position to the spatial strategy, taken in the May 2022 Second Addendum which also promotes the brownfield and greenfield land for housing. It is considered that this accords with government guidance in the PPG and justifies the approach taken by the Local Plan.
Representation Reference: REF026.1 Name: Resident	Refers to: POLICY ST1: Bassetlaw's Spatial Strategy	Legal compliance and soundness: Legal compliance of plan - not specified. Plan is unsound. Compliance with Duty to Co-operate - not specified.	Comments: A huge volume of new housing has already been developed in and around Worksop in recent years e.g. in the Gateford area. The Council has not explained why it believes thousands of additional houses are required, and why these should be built on greenfield sites.	Suggested changes: The plan needs to explain why developing such a huge volume of housing is consistent with National Policy and Central Government guidelines.	Officer comments: National policy states that the standard method is a minimum starting point for assessing housing need. National policy states that the housing requirement can exceed that. The HEDNA, 2020 assessed the housing need based upon modelling of forecasted

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
					economic growth. The 2022 HEDNA Addendum maintains that approach and informs the updated position to the spatial strategy, taken in the May 2022 Second Addendum which also promotes the brownfield and greenfield land for housing. It is considered that this accords with government guidance in the PPG and justifies the approach taken by the Local Plan.
Representation Reference: REF027.1 Name: Resident	Refers to: POLICY ST1: Bassetlaw's Spatial Strategy	Legal compliance and soundness: Legal compliance of plan - not specified. Plan is unsound. Compliance with Duty to Co-operate - not specified.	Comments: A huge volume of new housing has already been developed in and around Worksop in recent years e.g. in the Gateford area. The Council has not explained why it believes thousands of additional houses are required, and why these should be built on greenfield sites.	Suggested changes: The plan needs to explain why developing such a huge volume of housing is consistent with National Policy and Central Government guidelines.	Officer comments: National policy states that the standard method is a minimum starting point for assessing housing need. National policy states that the housing requirement can exceed that. The HEDNA, 2020 assessed the housing need based upon modelling of forecasted economic growth. The 2022 HEDNA Addendum maintains that approach

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
					and informs the updated position to the spatial strategy, taken in the May 2022 Second Addendum which also promotes the brownfield and greenfield land for housing. It is considered that this accords with government guidance in the PPG and justifies the approach taken by the Local Plan.
Representation Reference: REF034.1 Name: Spawforths on behalf Albemarle Homes	Refers to: Local Plan plan period	Legal compliance and soundness: Plan is not legally compliant, sound and it does not comply with the Duty to Cooperate.	Comments: The Vision only goes up to 2037. Suggest that the Plan period should fully encompass the proposed delivery of the Garden Village and be extended to at least 2053, which is a minimum of 30 years from the date of adoption.	Suggested changes: Should: <ul style="list-style-type: none"> • Update the evidence base to reflect national policy and guidance. • Review Spatial Strategy and assessment of sites. • Amend Plan period. 	Officer comments: In the case of larger scale developments, such as new settlements or significant extensions the NPPF requires policies to be set within a vision that looks ahead for at least 30 years, it does not require policies to plan ahead for 30 years. The 2022 May Second Addendum withdraws the Garden Village from the Local Plan, therefore the 2053 point is no longer considered relevant. The 2022 January Addendum

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
					extended the plan period to 2038 to ensure the Local Plan period covers at least 15 years from the expected date of adoption in 2023.
Representation Reference: REF034.4 Name: Spawforths on behalf of Albemarle Homes	Refers to: POLICY ST1: Bassetlaw's Spatial Strategy	Legal compliance and soundness: Plan is not legally compliant, sound and does not comply with the Duty to Cooperate.	<p>Comments:</p> <p>There is a need for the Plan to provide a longer term vision of at least 30 years. The HEDNA 2020 utilises out of date and overly pessimistic forecasts. Maintain that there are clear circumstances in Bassetlaw which demonstrate the housing need is higher than the figure that results from the 'Standard methodology'. These include:</p> <ul style="list-style-type: none"> • The growth strategy and investment; • Infrastructure improvements; • Past delivery rates; and • Affordable housing need; <p>The Plan is unlikely to be adopted until 2023 at the earliest. Suggest that the Plan period be extended to 2038, to ensure that it looks ahead over a minimum of 15 years from adoption. The Plan period should fully encompass the proposed delivery of the Garden Village and be extended to at least 2053, which is a minimum of 30 years from the date of adoption.</p>	<p>Suggested changes:</p> <p>Should:</p> <ul style="list-style-type: none"> • Increase the housing requirement to reflect the economic growth aspirations for the District and region. • Update the evidence base to reflect the current economic growth situation. • Extend the Plan period to be at least 15 years from the date of adoption, and potentially for 30 years to reflect the Garden Village. • Include a higher buffer of 10%. • Review and provide evidence for the windfall allowance. 	<p>Officer comments:</p> <p>National policy states that the standard method is a minimum starting point for assessing housing need. National policy states that the housing requirement can exceed that. The HEDNA, 2020 assessed the housing need based upon modelling of forecasted economic growth. The 2022 HEDNA Addendum maintains that approach and informs the updated position to the spatial strategy taken in the May 2022 Second Addendum. The 2022 January Addendum extended the Local Plan period to 2038 in order to plan for 15 years from adoption. The 2022 May Second Addendum</p>

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
				<ul style="list-style-type: none"> • Review delivery rates and trajectory on allocations and commitments. • Identify further sites to increase flexibility in the Plan. • Allocate for housing site at Blyth Road, Blyth/Harworth 	<p>withdraws the Garden Village from the Local Plan, therefore the 2053 point is no longer considered relevant. The May 2022 Second Addendum included an updated housing land supply position, showing at 31 March 2022 a 17% buffer in the supply. The Housing Supply, Trajectory and Windfall Allowance Background Paper May 2022 clarifies the windfall approach. Delivery is based on up to date evidence in the LAA and Five Year Housing Land Supply Position Statement, 2021. The Trajectory shows sufficient delivery in Harworth & Bircotes to meet the need. There is therefore no requirement to allocate additional sites.</p>
Representation Reference: REF034.8	Refers to: Housing Supply in ST1	Legal compliance and soundness: Plan is not legally	Comments: Concerned with anticipated delivery rates, the buffer, and application of a lapse rate and the	Suggested changes: Should:	Officer comments: The HEDNA, 2020 assessed the housing need based

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
<p>Name: Spawforths on behalf of Albemarle Homes</p>		<p>compliant, sound and it does not comply with the Duty to Cooperate.</p>	<p>deliverability of some of the identified supply. The housing trajectory within appendix 3 contain ambitious delivery rates. The reliance of sites contained within ‘made’ Neighbourhood Plans, have not been subject to the same rigour on deliverability as those in a Local Plan. Aware of the unavailability and significant constraints of such sites: the Land to the east of Spital Road, Blyth (BDC03) for 55 dwellings should not be allocated. These should be reassessed and other appropriate sites considered, such as Albemarle Homes’ site at Blyth Road. The evidence for the windfall allowance does not show that such a quantum will continue for the lifetime of the Plan. The overall housing land supply should include a mix of small, medium and large sites to offer the widest possible range of products. An accurate assessment of availability, suitability, achievability and therefore deliverability and viability should be undertaken. Assumptions on lead in times and delivery rates should be correct. The viability assessment does not appear to fully reflect the Local Plan policy requirements in Policy ST29 and First Homes; Policy ST30 and serviced plots and Policy ST31 and specialist housing. The current statement suggests the use of a 5% buffer; best practice is normally to utilise a 10%</p>	<ul style="list-style-type: none"> • Increase the housing requirement to reflect the economic growth aspirations for the District and region. • Update the evidence base to reflect the current economic growth situation. • Extend the Plan period to be at least 15 years from the date of adoption, and potentially for 30 years to reflect the Garden Village proposals. • Include a higher buffer of 10%. • Review and provide evidence for the windfall allowance. • Review delivery rates and trajectory on allocations and commitments. • Identify further sites to increase flexibility in the Plan. 	<p>upon modelling of forecasted economic growth. The 2022 HEDNA Addendum maintains that approach and informs the updated position to the spatial strategy taken in the May 2022 Second Addendum. Site delivery is based upon historic delivery rates in the district and information on build-out rates provided by developers and site promoters. The May 2022 Second Addendum included an updated housing land supply position, showing at 31 March 2022 a 17% buffer in the supply as a contingency against non-delivery. There is no longer a requirement in the NPPF to apply a lapse rates discount. Delivery in the small and large settlements has been high including some sites which were allocated in</p>

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			buffer. There is a need for further allocations to support the requirement within Policy ST1.	<ul style="list-style-type: none"> Allocate for housing Albemarle Homes' site at Blyth Road, Blyth/Harworth 	made neighbourhood plans. The Land Availability Assessment considers the Blyth Road site is unsuitable due to separation from Blyth and poor access to services and facilities. The 2022 January Addendum extended the Local Plan period to 2038 in order to plan for 15 years from adoption. The 2022 May Second Addendum withdraws the Garden Village from the Local Plan. The Housing Supply, Trajectory and Windfall Allowance Background Paper May 2022 clarifies the windfall approach. The LAA and the Five Year Housing Land Supply Position Statement, 2021 states that there are 981 commitments on sites of less than 9 dwellings, with all being less than 1 hectare in size. Together with small site allocations

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
					<p>in neighbourhood plans, the Local Plan and the Worksop Central DPD, ensure that sites less than 1 hectare contribute more than 10% towards meeting the housing requirement. It is considered that the assumptions within the Whole Plan Viability Assessment May 2022 are appropriate and consistent with national guidance are fully consider relevant policy requirements. The housing delivery test results for 2020 (January 2021) indicate that Bassetlaw delivery was 196% against the target of the last 3 years, so a 5% buffer is appropriate. There is therefore no requirement to allocate additional sites.</p>

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
<p>Representation Reference: REF034.9</p> <p>Name: Spawforths on behalf of the landowner</p>	<p>Refers to: POLICY ST1: Bassetlaw's Spatial Strategy - Distribution</p>	<p>Legal compliance and soundness: Plan is not legally compliant, sound and does not comply with the Duty to Cooperate.</p>	<p>Comments: The proportion of housing in Harworth & Bircotes has decreased in the Publication Local Plan from earlier iterations. There are suitable sites on the edge of Harworth & Bircotes, such as their site at Blyth Road. The Council considered this site to be a remote rural location, which is incorrect.</p>	<p>Suggested changes: Should:</p> <ul style="list-style-type: none"> • Increase the housing requirement to reflect the economic growth aspirations for the District and region. • Update the evidence base to reflect the current economic growth situation. • Extend the Plan period to be at least 15 years from the date of adoption, and potentially for 30 years to reflect the Garden Village. • Include a higher buffer of 10%. • Review and provide evidence for the windfall allowance. • Review delivery rates and trajectory on allocations and commitments. 	<p>Officer comments: The Trajectory shows sufficient delivery in Harworth & Bircotes to meet the need. There is therefore no requirement to allocate additional sites. The Land Availability Assessment considers the Blyth Road site is unsuitable due to separation from main settlement of Blyth and poor access to services and facilities. Other matters are addressed in response to REF034.8 above.</p>

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
				<ul style="list-style-type: none"> • Identify further sites to increase flexibility in the Plan. • Allocate site at Blyth Road, Blyth/Harworth 	
Representation Reference: REF035.2 Name: Home Builders Federation	Refers to: POLICY ST1: Housing Land Supply	Legal compliance and soundness: Plan is legally compliant and complies with the Duty to Cooperate. Plan is unsound.	Comments: It is not clear if a non-implementation lapse rate has been applied to existing commitments and / or allocations. There are anomalies in the Council's figures for new allocations and Worksop Central DPD, which should be corrected. The windfall allowance of 1,200 dwellings should be robustly evidenced. Using the Council's evidence, overall HLS is above the minimum housing requirement by 2,151 dwellings (21.5%) including the windfall allowance. The HBF suggests as large a contingency as possible for maximum flexibility. The strategic sites should be complimented by smaller non-strategic sites. 10% of Bassetlaw's housing requirement is 1,000 dwellings however only 5 proposed site allocations (HS2, HS5, HS8, HS10 & HS12) are less than one hectare. The Council should confirm compliance with 2021 NPPF (para 69a). It is critical that an accurate assessment of availability, suitability, deliverability, developability and viability is undertaken. Should provide evidence of its 5 YHLS position on adoption of the Local Plan	Suggested changes: <ul style="list-style-type: none"> • It is critical that an accurate assessment of availability, suitability, deliverability, developability and viability is undertaken. • Assumptions on lead in times and delivery rates should be correct and supported by parties responsible. • The Council should provide evidence of its 5 YHLS position on adoption of the Local Plan using 591 dwellings pa, and that a 5 YHLS is maintainable 	Officer comments: Site delivery is based upon historic delivery rates in the district, and takes account of information on build-out rates provided by developers and site promoters. The Local Plan provides for more than the housing requirement with an 17% buffer. There is no longer a requirement in the NPPF to apply a lapse rate discount. Sites with planning permission should be considered deliverable unless there is clear evidence that schemes will not be implemented within 5 years. The application of this discount may lead to an unnecessarily pessimistic assessment.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>using 591 dwellings. This should demonstrate a 5 YHLS on adoption of the Local Plan, maintainable through the plan period. Bassetlaw 5 YHLS Report October 2020 applies a 5% buffer. If under the 2021 NPPF the Council is seeking to formally fix a 5 YHLS through the Local Plan then a 10% buffer should be applied (para 74b).</p>	<p>through the plan period.</p> <ul style="list-style-type: none"> The Council is seeking to formally fix a 5 YHLS through the Local Plan then a 10% buffer should be applied (para 74b). 	<p>The Housing Land Supply Position, Housing Trajectory and Windfall Allowance Background Paper, May 2022 justifies the windfall allowance: there are 981 commitments on sites with a capacity of less than 9 dwelling, with all being less than 1 hectare in size. Together with, small site allocations in neighbourhood plans, the Local Plan and the Worksop Central DPD, ensure that sites less than 1 hectare contribute more than 10% towards meeting the housing requirement. The council will seek to fix a 5HLS through the Local Plan. It considers that there will be sufficient supply to provide for a rolling 5YHLS supply with a 10% buffer.</p>

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Representation Reference: REF035.3 Name: Home Builders Federation	Refers to: Local Housing Needs (LHN) and Housing Requirement ST1 Spatial Strategy	Legal compliance and soundness: Plan is legally compliant and sound. Plan complies with the Duty to Cooperate.	Comments: Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need and any needs that cannot be met within neighbouring areas can be met over the plan period (NPPF para 66). Bassetlaw’s minimum LHN is calculated as 288 dwellings per annum 2020 – 2037 based on 2014 Sub National Household Projections (SNHP), 2020 as the current year and 2019 affordability ratio of 6.35. The calculation is mathematically correct. As set out in the NPPG, the LHN is calculated at the start of the plan-making process; this number should be kept under review until the Local Plan is submitted for examination and revised when appropriate. The Government’s standard methodology identifies the minimum annual LHN. It does not produce a housing requirement figure (ID: 2a-002-20190220). LHN assessment is only a minimum starting point. The Council consider that a housing requirement based only on LHN would not support economic growth in the District. Economic growth would be constrained because of a shortage of skilled local labour and increase levels of in-commuting. The HEDNA 2020 identifies a minimum housing requirement of 591 dwellings per annum, which will support	Suggested changes: None	Officer comments: Noted

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name:			the full extent of jobs growth (9,735 jobs). The HEDNA 2020 also identifies an affordable housing need for 214 rented dwellings per annum. The NPPG states that total affordable housing need should be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments. A higher overall housing requirement to support economic growth will also contribute towards delivery of greater number of affordable homes. Support the Council in planning for more homes than the minimum LHN which is justified to support economic growth and to help deliver affordable housing.		
Representation Reference: REF036.1 Name: Marrons Planning on behalf of Vistry Group	Refers to: POLICY ST1: Bassetlaw's Spatial Strategy	Legal compliance and soundness: Plan is legally compliant and complies with the Duty to Cooperate. Plan is unsound.	Comments: Despite being the second largest town in the District, the Large and Small Rural Settlements, Other Villages and Countryside, will contribute more dwellings than Retford (at 3,343 dwellings, or 27.4% of the total provision). Retford should, be providing more towards meeting the housing needs to maintain the important role it plays in the settlement hierarchy.	Suggested changes: Retford is a sustainable location for additional growth and should contribute more to meeting the housing needs of the District.	Officer comments: It is considered Retford will contribute an appropriate amount of the housing growth (20%) to meet the district need in accordance with its role in the settlement hierarchy.
Representation Reference: REF036.2	Refers to: POLICY ST1 Supporting text	Legal compliance and soundness: Plan is legally compliant and	Comments: The housing requirement is not sound. National policies expect a plan period of a minimum of 15 years from the point of adoption (NPPF,	Suggested changes: <ul style="list-style-type: none"> The plan period should be extended to 2038, to mitigate 	Officer comments: The 2022 January Addendum proposes to extend the plan period to

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
<p>Name: Marrons Planning on behalf of Vistry Group</p>	<p>Paragraph 5.1.19 – 5.1.21</p>	<p>complies with the Duty to Cooperate. Plan is unsound.</p>	<p>para. 22), and so the Plan period should run to 2038, in the event it is not adopted until 2023. The housing requirement should therefore be increased by circa 600 homes and the Council should identify further housing allocations. The housing requirement should also be increased to take account of affordability. Even if it were assumed that all of the LHN (591 dwellings per annum) could contribute 25% affordable housing, it would amount to only 148 affordable homes per annum. The housing requirement should be increased to reflect the levels of need for affordable housing.</p>	<p>the risk that the plan will not be adopted before 2023. The housing requirement should be increased accordingly.</p> <ul style="list-style-type: none"> • The housing requirement should be increased to take account of affordability. • Should allocate additional sites in sustainable locations to cater for the additional housing requirement. 	<p>2038 to plan for 15 years from expected adoption. It also increases the housing requirement to 591 dwellings. It is proposed to accommodate the additionality from sites that were expected to deliver beyond 2037. The allocation of new sites is not required. Affordability is taken into account in the calculation of housing need using the standard method via the affordability ratio. It is considered that sufficient provision has been made to meet the housing needs of the district in sustainable locations through a proportionate and balanced distribution. It is considered that the higher housing requirement will appropriately contribute to meeting the identified affordable housing need.</p>

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name: Representation Reference: REF038.1 Name: Fisher German on behalf of land owner	Refers to: POLICY ST1: Spatial Strategy Paragraph 5.1.20	Legal compliance and soundness: Legal compliance, soundness and compliance with the Duty to Cooperate – not specified.	Comments: The approach to increase the Housing Requirement to 591 dwellings per annum is supported and has been effectively justified in the Housing and Economic Development Needs Assessment (HEDNA) (Update 2020). Without suitable increases in housing, the Council's economic goals are likely to be restricted due to lack of available working population. It should be noted that the recent changes to the Standard Method significantly increase the housing requirement for Sheffield City. It is considered that additional flexibility should be built into the Plan in the event that Sheffield City confirm it is unable to meet its own needs. The proposed Spatial Strategy which seeks to deliver sustainable development and growth, appropriate to the size of each settlement to meet the evidenced need for new homes and jobs in the District is generally supported.	Suggested changes: None	Officer comments: The May 2022 Second Addendum included an updated housing land supply position, showing at 31 March 2022 a 17% buffer in the supply. Bassetlaw has not agreed to take unmet housing need from neighbouring or nearby authorities including Sheffield. It is for the Sheffield Local Plan to determine how to accommodate any uplift identified.
Representation Reference: REF038.2 Name: Fisher German on behalf of land owner	Refers to: POLICY ST1 Spatial Strategy Paragraph 5.1.47	Legal compliance and soundness: Legal compliance, soundness and compliance with the Duty to Cooperate – not specified.	Comments: Retford is allocated circa 20% of the total level of growth delivered through the Plan period, the second highest of any settlement, behind only Worksop. This is considered to be an entirely commensurate and reflects both the spatial standing and sustainability of Retford. The acceleration of home working and flexible working post Covid-19 will make locations such	Suggested changes: None	Officer comments: Noted

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name:			as Retford, which is on the East Coast Main Line, highly attractive. With many workers in centres such as London only likely to need to be in the office a couple of days a week, reducing the commuting.		
Representation Reference: REF040.1	Refers to: POLICY ST1: Bassetlaw's Spatial Strategy	Legal compliance and soundness: Legal compliance and compliance with Duty to Cooperate - not specified. Plan is unsound.	Comments: The objective to promote sustainable extensions to existing settlements and the reuse of brownfield sites is welcomed. Focusing on Worksop, it is encouraging to see the Council acknowledge the sustainability of the settlement and the aspirations associated with the long-term improvements proposed through the Worksop Central Development Plan Document (DPD). No objection to the spatial strategy, nor its settlement hierarchy.	Suggested changes: None	Officer comments: Noted
Representation Reference: REF042.2	Refers to: POLICY ST1: Bassetlaw's spatial Strategy	Legal compliance and soundness: Plan is legally compliant and complies with the Duty to Cooperate. Plan is unsound.	Comments: The site is to the north of Retford and represents a logical extension to the settlement and offers the opportunity for additional choice within the housing supply. It is being promoted by a reputable housebuilder, who is currently delivering the site immediately to the south. Object to the Plan as drafted; the site should be included within the settlement boundary with the land to the south (under development) and potentially land to the west, which is in the same ownership. Amend the boundary to reflect development that is underway and to	Suggested changes: The site's inclusion as a housing allocation in the emerging Local Plan. It will be available early on in the plan period.	Officer comments: LAA221 has not been taken forward for allocation as there are other, more suitable sites available. The site is located outside of the Retford Development Boundary so is in the countryside. The Land Availability Assessment states that an increase in traffic in combination with that from the site to the

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			take the opportunity to round off the settlement in this location.		south which has planning permission (18/00069) is likely to place unacceptable strain and severe residual cumulative impacts on the road network in the area. The site is not well contained by existing built form and it would not represent a logical rounding off of the urban area. LAA012 to the west is considered to have an adverse landscape impact and is located in Flood Zone 2. It is acknowledged that the site west of Longholme Road (21/00357/RES) has now commenced so should be incorporated within the settlement boundary of Retford. This will be identified as a proposed suggested change to the Policies Map.
Representation Reference: REF043.7	Refers to: POLICY ST1 Spatial	Legal compliance and soundness: Plan is legally	Comments: The plan no longer recognises the Cottam Priority Regeneration Area within the spatial	Suggested changes: Priority Regeneration Areas should be	Officer comments: The Cottam Power Station site is identified by the

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name:					
Name: Gladmans	Strategy – Priority Regeneration Areas	compliant and complies with Duty to Cooperate. Plan is unsound.	strategy. It is acknowledged that the Council are not reliant on the delivery of Cottam to meet current development needs; and that the site is a broad location for future growth. Consider that Priority Regeneration Areas should be recognised in the spatial strategy, either in the settlement hierarchy or acknowledged in Criterion 4-5 of Policy ST1, given that the Council acknowledge development is likely to come forward at the site.	recognised in the spatial strategy, in the settlement hierarchy or acknowledged within Criterion 4-5 of Policy ST1,	Local Plan as a broad location where growth could take place subject to the identified policy criteria being met. On that basis, it is not considered that Cottam should be categorised as a standalone settlement in the settlement hierarchy.
Representation Reference: REF043.8	Refers to: POLICY ST1: Bassetlaw’s Spatial Strategy (5) and Bevercotes Colliery site	Legal compliance and soundness: Plan is legally compliant and complies with Duty to Cooperate. Plan is unsound.	Comments: Welcome Policy ST1 (5) which reflects the contribution of job growth in the spatial strategy through the delivery of the General Employment Sites and at Apleyhead Strategic Employment Site. Consider that Bevercotes Colliery should be referenced in Policy ST1 (5) as a Priority Regeneration Area capable of delivering employment uses and significant employment opportunities, notably logistic uses, as through the extant planning permission.	Suggested changes: Bevercotes Colliery should be referenced in Policy ST1 (5) as a Priority Regeneration Area capable of delivering employment uses, significant employment opportunities, notably logistics.	Officer comments The 2022 January Addendum allocates the former Bevercotes Colliery as an employment site (EM008a) under Policy ST7.
Representation Reference: REF045.2	Refers to: POLICY ST1: Bassetlaw’s Spatial Strategy - distribution of housing	Legal compliance and soundness: Plan is legally compliant and complies with the Duty to Cooperate.	Comments: Accept that commitments and made Neighbourhood Plan allocations account for 1,773 units within the overall growth strategy for small villages, question why no further opportunity for growth was afforded to Large or Small Rural Settlements other than Tuxford.	Suggested changes: Should allocate land outside of settlement boundaries, particularly in those more rural locations which would see the	Officer comments: It is considered that the Large and Small Rural Settlements are making a significant contribution to meeting housing need through completions,

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name: behalf of Rose & Co Homes		Plan is Unsound.		greatest benefit from investment in their communities.	planning permissions and Neighbourhood Plan allocations. The Plan supports growth of the rural area appropriately through Neighbourhood Planning; this should ensure that each area retain their distinctiveness, so that development is in keeping with their size, the level of services and infrastructure capacity.
Representation Reference: REF051.3 Name: Resident	Refers to: POLICY ST1: Spatial Strategy Housing Requirement	Legal compliance and soundness: Plan is not legally compliant and is unsound. Plan does not comply with the Duty to Cooperate	Comments: Government has said Bassetlaw needs 5000 houses between now and 2037 but Bassetlaw is doubling this.	Suggested changes: Rethink where you are proposing to build. Use more brownfield sites instead of using good farm land.	Officer comments: National policy states that the standard method is a minimum starting point for assessing housing need. National policy states that the housing requirement can exceed that. The HEDNA, 2020 assessed the housing need based upon modelling of forecasted economic growth. The 2022 HEDNA Addendum maintains that approach and informs the updated position to the spatial

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
					strategy taken in the May 2022 Second Addendum. A mix of brownfield and greenfield land is allocated to meet the need.
Representation Reference: REF047.2 Name: Welbeck Estates	Refers to: POLICY ST1: Spatial Strategy/Settlement Hierarchy	Legal compliance and soundness: Plan is legally compliant and complies with Duty to Cooperate. Plan is Unsound.	Comments: The Local Plan is being prepared as a departure from the emerging revision to the Cuckney, Holbeck, Norton and Welbeck Neighbourhood Plan (CNHW). The Local Plan must correlate as much as possible with the NP. The Plan's 'Settlement Hierarchy' is set out in Policy ST1. There should be a further settlement category between large and small rural settlements, to illustrate those with particular importance as a rural hub. The role of Cuckney (identified as a small settlement) is well defined in the made CNHW Neighbourhood Plan, in supporting all of the other settlements in the plan area. Cuckney should be identified as a small settlement towards introducing a new component of the settlement hierarchy. Many authorities have small, medium, and large settlements as it provides a greater opportunity to ensure that development is directed to the most sustainable settlements. Bassetlaw should adopt this approach. Nether Langwith: have concerns with the assessments made of the sustainability of this settlement. P40 of the Plan	Suggested changes: <ul style="list-style-type: none"> • There should be another settlement category between large and small rural settlements, to illustrate those rural hubs and to provide consistency with Neighbourhood Plans. • Cuckney should sit in a new settlement category between small and large rural settlements. • There is a mistake on page 40 of the Plan (Policy ST2) which shows Nether Langwith as a large settlement with a 20% growth requirement. 	Officer comments: There is no requirement for an emerging Local Plan to be in conformity with a neighbourhood plan as the Local Plan sets the strategic higher tier policies. The Spatial Strategy Background Paper sets out the methodology to categorising rural settlements in Bassetlaw based on their size and the level of services and facilities they provide. This identifies that in general Bassetlaw has two types of settlements; large and small. The identified growth requirements have been set from a strategic perspective and if communities wish to seek a higher proportion of

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>(Policy ST2) shows Nether Langwith (along with a number of other settlements) as a large settlement with a 20% growth requirement. Disappointed in the lack of response on the position of the village given the significance of the number of facilities we have put forward. Reiterate that such an assessment of Nether Langwith must be made in the context of the amenities that lie over the border in Langwith and Whaley Thorns, Bolsover. This would change the category of this settlement to a large rural settlement. Even when the wider settlements are not considered, the village demonstrates all of these facilities, and more, save for a Primary School which is in reasonable distance. The accessibility is much better than other Large Rural Settlements due to its railway station. Norton and Holbeck have been omitted from the settlement hierarchy. Both should be included as a small rural settlement.</p>	<ul style="list-style-type: none"> • Nether Langwith has the amenities and services to designate it a Large Rural Settlement. • Norton and Holbeck should be included in the small rural settlement designation in Policy ST2. 	<p>growth than identified, then this can be explored through a Neighbourhood Plan. Cuckney meets the criteria within the Rural Settlement Study for a Small Rural Settlement. Norton and Holbeck are too small in size and do not provide any services and facilities to qualify as a Small Rural Settlement from a strategic perspective. Although Nether Langwith is located in close proximity to a larger settlement, this settlement falls outside the District Boundary and therefore is not considered within the Rural Settlement Study. Mansfield District Council as the directly affected neighbouring authority have not objected to this approach. Nether Langwith is identified as a Small Rural Settlement which is to</p>

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
					provide a 5% growth requirement (the reference to 20% was an error in Policy ST2). The May 2022 Second Addendum addresses this point.
Representation Reference: REF048.1 Name: Nottinghamshire County Council	Refers to: POLICY ST1: Bassetlaw's Spatial Strategy	Legal compliance and soundness: Legal compliance – not specified Plan is unsound Compliance with Duty to Cooperate – not specified	Comments: It has yet to be satisfactorily demonstrated that the transport requirements for the site allocations in the Main Towns, Worksop Outer Area, Worksop Central, Retford, and the Garden Village can be accommodated on the highway network with particular concern regarding contributions to funding required to improve the strategic and road network. Refer to the comments made in relation to Policy ST4, Policy 9 SEM1, Policy 16 Site HS1 and Policy 21 site HS13 & 7.	Suggested changes: Refer to comments made in relation to Policy ST4, Policy 9 SEM1, Policy 16 Site HS1 and Policy 21 site HS13 & 7 which identify proposals to aid soundness.	Officer comments: The Bassetlaw Transport Study 2022 has been accepted by the County Council. It is considered that this provides an appropriate evidence base to identify the transport requirements from the spatial strategy, and to identify contributions to funding for the strategic road network. It is considered that the January 2022 Addendum and May 2022 Second Addendum address the relevant matters identified for relevant strategic sites. It is proposed to address other matters as proposed suggested changes. This will ensure that all

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name:					identified impacts upon the highways network from site allocations are appropriately mitigated.
Representation Reference: NRF-REF001.1 Name: Resident	Refers to: Local Plan Evidence – Bassetlaw Retail and Leisure Study 2017	Legal compliance and soundness: Legal compliance and soundness – not specified Compliance with Duty to Cooperate – not specified	Comments: 5.1.30 - "The Bassetlaw Retail and Leisure Study 2017 13 states there is no identified need for new retail development to 2035". 5.1.48 - "H&B has a good range of shops and services." 3.24 "Harworth and Bircotes will effectively double its size" The current range of shops and services is not suitable for the growth taking place.	Suggested changes: Bassetlaw Retail Study is out of date and should be updated in relation to Harworth and Bircotes.	Officer comments: The emerging Harworth & Bircotes Town Centre Masterplan and the Harworth & Bircotes Neighbourhood Plan (and review) will provide an appropriate framework to help deliver the community's vision and objectives for Harworth and Bircotes, including Local Plan site allocation HB001 which seeks to extend the town centre boundary.
Representation Reference: NRF-REF006.1 Name: Barton Wilmore on behalf of Howard (Retford) Ltd	Refers to: POLICY ST1: Bassetlaw's Spatial Strategy	Legal compliance and soundness: Legal compliance and soundness – not specified Compliance with Duty to Cooperate – not specified	Comments: Supportive of the spatial approach set out and the 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	Suggested changes: None	Officer comments: Noted

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
<p>Representation Reference: NRF-REF008.1</p> <p>Name: Retford Civic Society</p>	<p>Refers to: POLICY ST1: Bassetlaw’s Spatial Strategy - Housing Requirement</p>	<p>Legal compliance and soundness: Legal compliance – not specified</p> <p>The Plan is considered to be unsound</p> <p>Compliance with Duty to Cooperate – not specified</p>	<p>Comments: Object to the number of houses provided for in the Plan. It is excessive and should be reduced. It will result in: unnecessary loss of greenfield and agricultural land; additional traffic, pressure on infrastructure and loss of valued views and open spaces. In only 2 of the 15 years have completions exceeded 591 dw pa which the Plan states is the housing requirement. If the Local Plan is adopted with too high a housing requirement there is a real risk that annual completions will fail to meet this. Actual delivery may well be below 75%. Should that occur the benefit of having an adopted plan, in terms of the ability to control house building, would be lost as the Government’s Housing Delivery Test would result in there being a presumption in favour of development. It is almost 2.5 times the ‘standard method’. None of the circumstances in the PPG justify the increase above the minimum apply in Bassetlaw. There are no national or regional growth strategies pointing towards accelerated growth. No strategic infrastructure improvements are planned. There is no requirement to meet the housing need of adjoining authorities. The HEDNA does not recommend adopting any other figures. It advises that if higher than expected</p>	<p>Suggested changes: Reduce the Housing Requirement to reflect the Standard Method figure of 288 dwellings per annum.</p>	<p>Officer comments: National policy states that the standard method is a minimum starting point for assessing housing need. National policy states that the housing requirement can exceed that. The HEDNA, 2020 and the 2022 HEDNA Addendum assessed the housing need based upon modelling of forecasted economic growth to reflect the level of committed general employment sites in the district. This has consequential implications for the housing requirement, which national planning guidance asks aligns with jobs growth. The 2022 HEDNA Addendum informs the updated position to the spatial strategy and housing requirement taken in the May 2022 Second Addendum and concludes</p>

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>employment is likely it should test the implications of providing 562 – 591 dw pa. There is no indication that BDC has carried out further analysis or that they have undertaken the testing recommended. Appear determined to plan for an exceptionally high rate of housing growth for reasons which are unclear. To assume that all identified employment sites will be fully developed in the Plan period is unrealistic. There is no evidence that investment will come forward during the Plan period on the scale assumed. Once serviced, employment sites have generally taken a long time to fill. It is reasonable to hope for more success in attracting new jobs, employment sites in Bassetlaw will be competing against those in neighbouring authorities. Doncaster has well developed and funded plans to continue its expansion of jobs centred on ready access to the A1, M18, Robin Hood’s Airport and the regional rail hub.</p>		<p>that up to 582 dwellings per annum would be required to support the overall level of economic growth envisaged in the district by 2038. It will also better enable the Local Plan to contribute to affordable housing needs in the District. It is considered that the HEDNA provides a realistic approach to the delivery of employment allocations in the Local Plan, informed by market evidence and current activity.</p>
<p>Representation Reference: NRF-REF014.2</p> <p>Name: East Markham Parish Council</p>	<p>Refers to: POLICY ST1: Bassetlaw’s Spatial Strategy</p>	<p>Legal compliance and soundness: Legal compliance – not specified Soundness – not specified</p>	<p>Comments: The level of population growth means large numbers will be travelling outside the district for work. In housing standard methodology 288 dwellings per year are required this is insufficient to house the estimated population increase. Bassetlaw are planning to build 591 homes per year a total of 10,047. Given an estimated</p>	<p>Suggested changes: A figure of 413 dwellings per annum for the Housing Requirement</p>	<p>Officer comments: National policy states that the standard method is a minimum starting point for assessing housing need. National policy states that the housing requirement can exceed that. The</p>

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
		Compliance with Duty to Cooperate – not specified	occupation rate of 3 per household 10,047 will give an increase population growth 30,142 far in excess of the estimated growth of 18600. A figure of 413 per annum would be more realistic giving 6,195 dwellings a figure more in line with population growth. The plan assumes with no supporting evidence that 9,735 additional jobs will be provided over the period of the plan. This would appear over optimistic. The plan also calls for the building of 10,047 houses this seems to be an oversupply. The district is being used to provide low-cost housing for surrounding councils which are unable or unwilling to meet their own housing needs.		HEDNA, 2020 assessed the housing need based upon modelling of forecasted economic growth. The 2022 HEDNA Addendum maintains that approach and informs the updated position to the spatial strategy taken in the May 2022 Second Addendum. The HEDNA provides a realistic approach to the delivery of employment allocations in the Local Plan, informed by market evidence and current activity. Bassetlaw has not agreed to take unmet housing need from neighbouring authorities, as evidenced by statements of common ground.
Representation Reference: NRF-REF019.1 Name: Rotherham	Refers to: POLICY ST1: Bassetlaw's Spatial Strategy -	Legal compliance and soundness: Legal compliance – not specified	Comments: The allocation of housing land above evidenced need has led to the need to allocate additional employment land, and vice versa. Question whether the level of growth proposed is justified or sustainable. A supply-led approach	Suggested changes: No changes suggested	Officer comments: The HEDNA, 2020 assessed the housing need based upon modelling of forecasted economic growth. The 2022 HEDNA

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Metropolitan Borough Council	Scale of development Paragraphs 5.1.12 to 5.1.21 of the Supporting text	Soundness – not specified Compliance with Duty to Cooperate – not specified	in paragraph 5.1.12 cannot take into account future economic changes and is likely to become economically unsustainable for Bassetlaw and for the wider region. The Sheffield City Region Strategic Employment Land Assessment (SELA) indicates that the Apleyhead site is additional to an already existing 40ha surplus of employment land in Bassetlaw. This site could have negative implications for regional growth weighted towards unsustainable locations.		Addendum maintains that approach and informs the updated position to the spatial strategy taken in the May 2022 Second Addendum. The HEDNA provides a realistic approach to the delivery of employment land in the Local Plan, informed by market evidence and current activity. The 2022 Second Addendum allocates Apleyhead to meet an identified need for regional or sub regional large scale logistics only, thereby ensuring land elsewhere in the region can be used appropriately, consistent with the SELA. Through Duty to Cooperate all authorities in the property market area have agreed a Statement of Common Ground supporting the allocation of Apleyhead for logistics in the Local Plan.

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name: Representation Reference: NRF-REF021.1 Name: Derbyshire County Council	Refers to: POLICY ST1: Bassetlaw's Spatial Strategy – Level of housing and economic growth supporting text Paragraph 5.1.18 5.1.19 5.1.20	Legal compliance and soundness: Legal compliance – not specified Soundness – not specified Compliance with Duty to Cooperate – not specified	Comments: The evidence demonstrates that pursuing a housing target based on the standard methodology minimum figure means that the Plan would not provide a sufficient number of dwellings to support the economic growth. A housing requirement of 591 dwellings per annum in this Plan (10,047 dwellings by 2037) has been set at a level to support the level of jobs growth (9,735 jobs) as identified in the HEDNA 2020. Consider that this has been well conceived and informed by a range of extensive and up-to-date evidence and provides for a well-balanced and sustainable proposed scale of housing provision and employment land provision in the Plan. The approach to spatial distribution of proposed future housing growth is supported as it should provide for a sustainable pattern of new housing growth, which is likely to have limited implications for the delivery of new housing in the Derbyshire local authority areas in the HMA.	Suggested changes: No changes suggested	Officer comments: Noted
Representation Reference: NRF-REF024.1 Name: IBA Planning	Refers to: Policy ST1: Bassetlaw's Spatial Strategy	Legal compliance and soundness: Legal compliance – not specified Soundness – not specified	Comments: Will depart even further from a system which will support the vitality and prosperity of the District's rural settlements and a proportionate and fair distribution of housing. Objections to the approach to Small Rural Settlements set out in our email dated 26/02/2020 remain valid.	Suggested changes: Amend Policy ST1 Spatial Strategy – small rural settlements should deliver more housing development	Officer comments: The Spatial Strategy Background Paper sets out the methodology to categorising rural settlements in Bassetlaw based on their size and the

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
		Compliance with Duty to Cooperate – not specified			level of services and facilities they provide. This identifies that in general Bassetlaw has two types of settlements; large and small. The identified growth requirements have been set from a strategic perspective and if communities wish to seek a higher proportion of growth than identified, then this can be explored through a Neighbourhood Plan. It is considered that a 5% growth requirement for each eligible Small Rural Settlement is appropriate (the reference to 20% was an error in Policy ST2). The May 2022 Second Addendum addresses this point.

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name: Representation Reference: 1945850.1 Name: Resident	Refers to: POLICY ST2: Residential Growth in Rural Bassetlaw	Legal compliance and soundness: Plan is legally compliant. Plan is unsound. Plan does not comply with Duty to Co-operate.	Comments: Concerns over the impact of future growth on the existing infrastructure, the environment, schools and traffic within Langold and the surrounding area.	Suggested changes: The town centre needs more development to make people want to use it. The town has brown field sites build on them but make sure the infrastructure is in place to support the houses being built	Officer comments: The Hodsock and Langold Neighbourhood Plan includes policies to protect and enhance the neighbourhood centre. The Local Plan takes a similar approach. The Large Rural Settlements have a Development Boundary designed to focus new development within the existing built up area of those settlements which could include brownfield land near the centre.
Representation Reference: 1945939.1 Name: Resident	Refers to: POLICY ST2: Residential Growth in Rural Bassetlaw	Legal compliance and soundness: Plan is not legally compliant. Plan is unsound. Plan does not comply with Duty to Co-operate.	Comments: Concerns over the lack of public consultation to the proposed level of growth within Langold throughout the process.	Suggested changes: None	Officer comments: The Consultation Statement shows that all Local Plan consultations have been undertaken in accordance with, and have exceeded the requirements of the Local Planning regulations and the Council's Statement of Community Involvement.

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name: Representation Reference: 1945982.1 Name: Resident	Refers to: POLICY ST2: Residential Growth in Rural Bassetlaw	Legal compliance and soundness: Plan is legally compliant. Plan is unsound. Plan complies with Duty to Co-operate.	Comments: Concerns over the impact of future growth on the existing infrastructure, the environment, schools and traffic within Langold and the surrounding area.	Suggested changes: Stop this plan build, there is enough housing developments occurring within Bassetlaw Area local to Langold and Worksop	Officer comments: Although Policy ST2 is proposing growth within Langold, recent planning permissions mean that the proposed growth identified has already been met. The Local Plan is not proposing any additional growth in Langold.
Representation Reference: REF1946246.2 Name: Barton Wilmore on behalf of Heyford Developments	Refers to: POLICY ST2: Residential Growth in Rural Bassetlaw	Legal compliance and soundness: Plan complies with the Duty to Cooperate. Plan is legally compliant. Plan is unsound.	Comments: Object to the Policy due to lack of justification or evidence on the distribution of the housing growth to the settlements in ST2, specifically in relation to Blyth.	Suggested changes: <ul style="list-style-type: none"> • should set out what the breakdown is in terms of commitments (including reductions for lapse rates) and new housing, and clarify whether Neighbourhood Plan allocations have been double counted in the commitments. Should also address the imbalance between the significantly higher quantum of development that the Small Rural Settlements are set to accommodate compared to the Large Rural 	Officer comments: The individual growth requirements for each eligible settlement are assessed via a detailed living Rural Monitoring Framework. Updated on a monthly basis it breaks down the level of commitments, completions and those under construction for each settlement. This is considered to be an appropriate mechanism for monitoring growth in the rural area. The Local Plan distributes housing growth according to the settlement hierarchy based upon ability

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
				<p>Settlements. This can be rebalanced if there is a shortfall due to double counting.</p> <ul style="list-style-type: none"> revisit the 20% growth requirement/cap applied to Large Rural Settlements and account for lapse rates. Additional growth should be directed to more sustainable settlements such as Blyth. This should consider the relationship between employment and housing growth as per response to Policy ST1. remove reference to the weight to be afforded to local community support in determining applications as this could undermine the assessment of an application on its merits. Replace with a more appropriate set of criteria. 	<p>to deliver sustainable development and growth, appropriate to the size of settlements, and availability of services and facilities. The Spatial Strategy Background Paper sets out the qualifying criteria for a 'large and small rural settlement'. Policy ST2 sets out the housing requirement for designated neighbourhood areas which reflects the spatial strategy and settlement hierarchy. There has not been a double counting of allocations in neighbourhood plans – commitments on small sites in the supply (9 or less dwellings) have not been considered in the representation. The Large Rural Settlements will contribute significantly towards meeting the need from existing permissions; as such there is no requirement to allocate additional sites in the rural area. There is a 17%</p>

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
				<ul style="list-style-type: none"> incorporate ongoing monitoring of delivery and supply within the Rural Settlements, with a policy basis to support additional supply in the event Neighbourhood Plan allocations and other commitments are not being delivered. 	<p>buffer in the supply in case of non-delivery. This provides sufficient flexibility. There is not a requirement to include a lapsed sites discount rate. At 31 March 2022 there were 49 dwellings with extant planning permission in Blyth. Between the 1 April 2020 and the 31 March 2022 there were 17 completions. There are 55 dwellings allocated in the neighbourhood plan, but without planning permission. This makes a total provision of 121 dwellings for Blyth. This satisfies the growth requirement. It is considered that a proposed suggested change to Policy ST2 will address the matter of community consultation: In the case of 3b i-vi above, a developer-led pre-application consultation should be undertaken for major residential development in accordance with the Statement of</p>

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
					Community Involvement to evidence the level of community support for the proposal.
Representation Reference: 1946370.1 Name: Asbury Planning	Refers to: POLICY ST2 - Figure 8: Distribution of housing growth	Legal compliance and soundness: Legal compliance – not specified. Plan is unsound. Compliance with Duty to Cooperate – not specified.	Comments: Concerns over the inconsistencies in terms of the background housing data and information that helps inform the level of growth within Policy ST2.	Suggested changes: Unable to establish whether there is an error in Figure 8 or whether the figures are correct and the Rural Monitoring Table is inaccurate. Also have to establish the precise number of qualifying completions to ensure the land supply is robust. If Figure 8 is inaccurate and considerably overstates completions and /or commitments for the small rural settlements then this would have a knock-on implication for the implementation of ST2 and the 5% growth cap.	Officer comments: The individual growth requirements for each eligible settlement are assessed via a detailed living Rural Monitoring Framework. Updated on a monthly basis it breaks down the level of commitments, completions and those under construction for each settlement. This is considered to be an appropriate mechanism for monitoring growth in the rural area. There has not been a double counting of allocations in neighbourhood plans –commitments on small sites in the supply (9 or less dwellings) have not been considered in the representation.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Representation Reference: REF002.1 Name: Lound Neighbourhood Plan Steering Group	Refers to: POLICY ST2: Residential Growth in Rural Bassetlaw - Paragraph 3	Legal compliance and soundness: Plan complies with the Duty to Cooperate. Plan is legally compliant. Plan is unsound.	Comments: Concern over the inclusion of "developer-led consultation' to part 3 of ST2 and how this may undermine the Neighbourhood Planning approach.	Suggested changes: Suggest that the text shown in red strikethrough should be removed from Paragraph 3 of Policy ST2 of the Plan as follows: "3. Where the growth requirement for an eligible Large or Small Rural Settlement has been achieved, additional residential development will only be supported where it can be demonstrated that it has the support of the community through the preparation of a neighbourhood plan (including a review), or through a developer-led pre-application community consultation where it is proposing:...'	Officer comments: It is considered that a reference to developer-led consultation is appropriate for those settlements that do not currently have a Neighbourhood Plan or where it is demonstrated that a neighbourhood plan is not delivering homes on their allocations after a two-year period. It is considered that this matter has been appropriately addressed through the May 2022 Second Addendum.
Representation Reference: REF002.2 Name: Lound Neighbourhood	Refers to: Table header on Page 40	Legal compliance and soundness: Plan complies with the Duty to Cooperate.	Comments: Support the 5% growth for Lound. This percentage number is subject to the correction of a mis-print of the table headings at the top of page 40 within Policy ST2, which appears to require 20% growth.	Suggested changes: Correct the header of the Table on Page 40.	Officer comments: It is acknowledged this is a typographical error. The May 2022 Second Addendum clarifies that 5% growth

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Plan Steering Group		Plan is legally compliant. Plan is unsound.			applies to Small Rural Settlements.
Representation Reference: REF004.1 Name: Lound Neighbourhood Plan Steering Group	Refers to: POLICY ST2: Rural Bassetlaw Residential Growth in Rural Bassetlaw - Paragraph 3	Legal compliance and soundness: Plan complies with the Duty to Cooperate. Plan is legally compliant. Plan is unsound.	Comments: Concern over the change proposed with regards to the addition of ‘pre-application developer-led consultation’ with the community to Policy ST2 Part 3. Feel that this should be removed and that any additional growth should only be supported through the Neighbourhood Planning process to support Localism.	Suggested changes: Suggest that the text shown in red strikethrough should be removed from Paragraph 3 of Policy ST2 of the Plan as follows: ‘3. Where the growth requirement for an eligible Large or Small Rural Settlement has been achieved, additional residential development will only be supported where it can be demonstrated that it has the support of the community through the preparation of a neighbourhood plan (including a review), or through a developer-led pre-application community consultation where it is proposing:...’	Officer comments: It is considered that a reference to developer-led consultation is appropriate for those settlements that do not currently have a Neighbourhood Plan or where it is demonstrated that a neighbourhood plan is not delivering homes on their allocations after a two-year period. It is considered that this matter has been appropriately addressed through the May 2022 Second Addendum.

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name: Representation Reference: REF004.2 Name: Lound Neighbourhood Plan Steering Group	Refers to: Table header on Page 40	Legal compliance and soundness: Plan complies with the Duty to Cooperate. Plan is legally compliant. Plan is unsound.	Comments: Noted that the Housing Growth Requirement for Lound remains at 5%, which equates to 10 new dwellings. Consultation shows that the village overwhelmingly believes that this is a sustainable and proportionate contribution to the national housing shortage, given Lound’s very limited facilities and narrow streets. This percentage number is subject to the correction of a mis-print of the table headings at the top of page 40 within Policy ST2, which appears to require 20% growth. This oversight has been acknowledged in an email from the Council’s Planning Policy Manager.	Suggested changes: Correct the header of the Table on Page 40.	Officer comments: It is acknowledged this is a typographical error. The May 2022 Second Addendum clarifies that 5% growth applies to Small Rural Settlements.
Representation Reference: REF005.1 Name: Lound Neighbourhood Plan Steering Group	Refers to: POLICY ST2 Rural Bassetlaw Residential Growth in Rural Bassetlaw - Paragraph 3	Legal compliance and soundness: Plan complies with the Duty to Cooperate. Plan is legally compliant. Plan is unsound.	Comments: Concern over the change proposed with regards to the addition of ‘pre-application developer-led consultation’ with the community to Policy ST2 Part 3. The group feel that this should be removed and that any additional growth should only be supported through the Neighbourhood Planning process to support Localism.	Suggested changes: Suggest that the text shown in red strikethrough should be removed from Paragraph 3 of Policy ST2 of the Plan as follows: “3. Where the growth requirement for an eligible Large or Small Rural Settlement has been achieved, additional residential development will only be supported where it	Officer comments: It is considered that a reference to developer-led consultation is appropriate for those settlements that do not currently have a Neighbourhood Plan or where it is demonstrated that a neighbourhood plan is not delivering homes on their allocations after a two-year period. It is considered that this matter has been

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
				can be demonstrated that it has the support of the community through the preparation of a neighbourhood plan (including a review), or through a developer-led pre-application community consultation where it is proposing:...'	appropriately addressed through the May 2022 Second Addendum.
Representation Reference: REF005.2 Name: Lound Neighbourhood Plan Steering Group	Refers to: Table header on Page 40	Legal compliance and soundness: Plan complies with the Duty to Cooperate. Plan is legally compliant. Plan is unsound.	Comments: Note that the Housing Growth Requirement for Lound remains at 5%, which equates to 10 new dwellings. Consultation shows that the village overwhelmingly believes that this is a sustainable and proportionate contribution to the national housing shortage, given Lound's very limited facilities and narrow streets. This percentage number is subject to the correction of a mis-print of the table headings at the top of page 40 within Policy ST2, which appears to require 20% growth. This oversight has already been acknowledged in an email from the Council's Planning Policy Manager.	Suggested changes: Correct the header of the Table on Page 40.	Officer comments: It is acknowledged this is a typographical error. The May 2022 Second Addendum clarifies that 5% growth applies to Small Rural Settlements.

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name: Representation Reference: REF011.2 Name: Lound Parish Council	Refers to: POLICY ST2: Residential Growth in Rural Bassetlaw	Legal compliance and soundness: Plan is legally compliant. Plan is unsound. Plan complies with Duty to Co-operate.	Comments: Concern over the change proposed with regards to the addition of “pre-application developer-led consultation’ with the community to Policy ST2 Part 3. The group feel that this should be removed and that any additional growth should only be supported through the Neighbourhood Planning process to support Localism.	Suggested changes: Paragraph 3 of Policy ST2 of the Plan should read as follows: “3. Where the growth requirement for an eligible Large or Small Rural Settlement has been achieved, additional residential development will only be supported where it can be demonstrated that it has the support of the community through the preparation of a neighbourhood plan (including a review) where it is proposing:...	Officer comments: It is considered that a reference to developer-led consultation is appropriate for those settlements that do not currently have a Neighbourhood Plan or where it is demonstrated that a neighbourhood plan is not delivering homes on their allocations after a two-year period. It is considered that this matter has been appropriately addressed through the May 2022 Second Addendum.
Representation Reference: REF019.2 Name: Lound Neighbourhood Plan Steering Group	Refers to: POLICY ST2: Residential Growth in Rural Bassetlaw	Legal compliance and soundness: Plan is legally compliant. Plan is unsound. Plan complies with Duty to Co-operate.	Comments: Concern over the change proposed with regards to the addition of “pre-application developer-led consultation’ with the community to Policy ST2 Part 3. The group feel that this should be removed and that any additional growth should only be supported through the Neighbourhood Planning process to support Localism.	Suggested changes: Paragraph 3 of Policy ST2 of the Plan should read as follows: “3. Where the growth requirement for an eligible Large or Small Rural Settlement has been achieved, additional residential development will	Officer comments: It is considered that a reference to developer-led consultation is appropriate for those settlements that do not currently have a Neighbourhood Plan or where it is demonstrated that a neighbourhood plan is not delivering homes on

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
				only be supported where it can be demonstrated that it has the support of the community through the preparation of a neighbourhood plan (including a review) where it is proposing:...	their allocations after a two-year period. It is considered that this matter has been appropriately addressed through the May 2022 Second Addendum.
Representation Reference: REF022.2 Name: Lound Neighbourhood Plan Steering Group	Refers to: POLICY ST2: Residential Growth in Rural Bassetlaw	Legal compliance and soundness: Plan is legally compliant. Plan is unsound. Plan complies with Duty to Cooperate.	Comments: Concern over the change proposed with regards to the addition of “pre-application developer-led consultation’ with the community to Policy ST2 Part 3. The group feel that this should be removed and that any additional growth should only be supported through the Neighbourhood Planning process to support Localism.	Suggested changes: Paragraph 3 of Policy ST2 of the Plan should read as follows: “3. Where the growth requirement for an eligible Large or Small Rural Settlement has been achieved, additional residential development will only be supported where it can be demonstrated that it has the support of the community through the preparation of a neighbourhood plan (including a review) where it is proposing:...”	Officer comments: It is considered that a reference to developer-led consultation is appropriate for those settlements that do not currently have a Neighbourhood Plan or where it is demonstrated that a neighbourhood plan is not delivering homes on their allocations after a two-year period. It is considered that this matter has been appropriately addressed through the May 2022 Second Addendum.

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Representation Reference: REF024.2 Name: Resident	Refers to: POLICY ST2: Residential Growth in Rural Bassetlaw	Legal compliance and soundness: Plan is legally compliant. Plan is unsound. Plan complies with Duty to Co-operate.	Comments: Concern over the change proposed with regards to the addition of “pre-application developer-led consultation’ with the community to Policy ST2 Part 3. The group feel that this should be removed and that any additional growth should only be supported through the Neighbourhood Planning process to support Localism.	Suggested changes: Paragraph 3 of Policy ST2 of the Plan should read as follows: “3. Where the growth requirement for an eligible Large or Small Rural Settlement has been achieved, additional residential development will only be supported where it can be demonstrated that it has the support of the community through the preparation of a neighbourhood plan (including a review) where it is proposing:...’	Officer comments: It is considered that a reference to developer-led consultation is appropriate for those settlements that do not currently have a Neighbourhood Plan or where it is demonstrated that a neighbourhood plan is not delivering homes on their allocations after a two-year period. It is considered that this matter has been appropriately addressed through the May 2022 Second Addendum.
Representation Reference: REF028.1 Name: Pegasus Group on behalf of land owner	Refers to: POLICY ST2: Residential Growth in Rural Bassetlaw - Point 1 and Table	Legal compliance and soundness: Plan is legally compliant and complies with Duty to Cooperate. Plan is unsound.	Comments: Rural settlements should see a higher proportion of growth and should be a minimum of 10% instead of 5% proposed. This is largely due to the previous delivery rates and their contribution to the Districts Housing land supply. Policy ST1 should also be changed to reflect this higher growth for smaller settlements. Confusion over the two plan base dates in the Plan, especially for Rural Bassetlaw and there is an error within	Suggested changes: Policy ST2 of the Local Plan should be amended as: 1. Large Rural Settlements and Small Rural Settlements, as defined in the settlement hierarchy in Policy ST1, will experience residential growth to support their role and function through completed sites, sites with	Officer comments: The Rural Settlement Study provides the basis for the rural growth figures. The Local Plan distributes housing growth according to the settlement hierarchy based upon a settlement’s ability to deliver sustainable development and growth, appropriate to the size of

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			the header of the table for Small Rural Settlements in Policy ST2.	planning permission, site allocations in this Local Plan, or from site allocations in made neighbourhood plans. Eligible settlements are individually required to grow by a minimum of: Eligible Small Rural Settlement 510% Growth Requirement, as number of dwellings	settlements, and availability of services and facilities. It is considered that Policy ST2 provides an appropriate requirement for eligible settlements in line with the spatial strategy and settlement hierarchy. Policy ST2 Part 3 provides flexibility in accommodating additional growth in the rural area should the growth requirement be met. It is considered that the May 2022 Second Addendum clarifies that a 5% growth applies to Small Rural Settlements and ensures that the base date for rural Bassetlaw aligns with the Local Plan.
Representation Reference: REF031.1 Name: Derek Kitson Architectural Technologist Ltd	Refers to: POLICY ST2 Residential Growth in Rural Bassetlaw - Paragraphs 5.2.1 and 5.2.2	Legal compliance and soundness: Plan is legally compliant and complies with the Duty to Cooperate.	Comments: General conflict with NPPF in the approach to growth in rural Bassetlaw. The methodology to determine the settlement hierarchy is based on information that can change frequently. More growth in rural Bassetlaw will help to support local services, facilities and infrastructure.	Suggested changes: 1. Omit the Garden Village. 2. Redistribute residential and economic development into existing rural settlements or identify other rural areas suitable for employment, possibly	Officer comments: The May 2022 Second Addendum withdraws the Garden Village from the Local Plan. Housing growth is distributed according to the settlement hierarchy based upon ability to deliver

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
		Plan is unsound.		alongside main vehicular roads, A1 and A638. 3. Identify and accept the “cluster” aspect of village life in accordance with NPPF paragraph 79 making these policies more reflective of the aims of the NPPF.	sustainable development and growth, appropriate to the size of settlements, and availability of services and facilities. It is considered that this is in accordance with the NPPF. Rural Employment is dealt with through Policies ST10 and ST11.
Representation Reference: REF034.10 Name: Spawforths on behalf of the landowner	Refers to: POLICY ST2: Residential Growth in Rural Bassetlaw	Legal compliance and soundness: Plan is not legally compliant, sound and it does not comply with the Duty to Cooperate.	Comments: Concern over the strict nature of the policy criteria which will restrict development and limit investment in infrastructure. Conflicts with NPPF for rural development and Part 2 seems to be applying Green Belt policies in a non Green Belt area. Part 3 of the policy is unnecessary and appears to restrict exception cases. This does not reflect national policy and guidance and the presumption in favour of sustainable development, especially if there is no five year housing land supply.	Suggested changes: Should: • Update to reflect national policy and guidance	Officer comments: Housing growth is distributed according to the settlement hierarchy based upon ability to deliver sustainable development and growth, appropriate to the size of settlements, and availability of services and facilities. It is considered that this is in accordance with the NPPF. Part 2 of Policy ST2 is considered to provide an appropriate criteria based approach to assess housing proposals in the rural area. Policy ST2 Part 3 provides flexibility in accommodating additional growth in the

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
					rural area should the growth requirement be met.
Representation Reference: REF048.9 Name: Gladmans	Refers to: POLICY ST2: Residential Growth in Rural Bassetlaw	Legal compliance and soundness: Plan is legally compliant and complies with Duty to Cooperate. Plan is unsound.	Comments: Concern over the use and inclusion of development boundaries for rural settlements.	Suggested changes: No suggested amendment. Comments suggest that Policy ST2, Criterion B is too restrictive.	Officer comments: The Development Boundaries Background Paper explains the approach taken to development boundaries. Where a settlement has a defined development boundary, as identified by a Neighbourhood Plan for example, it is appropriate that new development is directed within the boundary to support sustainable development.
Representation Reference: REF043.10 Name: Gladmans	Refers to: POLICY ST1: Bassetlaw's Spatial Strategy and POLICY ST2: Residential Growth in Rural Bassetlaw	Legal compliance and soundness: Plan is legally compliant and complies with Duty to Cooperate. Plan is unsound.	Comments: The housing figures within ST1 and ST2 are unclear. ST1 states one figure and the level of growth identified in ST2 states another.	Suggested changes: Further guidance and clarity is required to address the discrepancies between policies ST1 and ST2.	Officer comments: It is considered that the January 2022 Addendum and May 2022 Second Addendum addresses this matter.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Representation Reference: REF043.12 Name: Gladmans	Refers to: POLICY ST1: Bassetlaw's Spatial Strategy and POLICY ST2: Residential Growth in Rural Bassetlaw	Legal compliance and soundness: Plan is legally compliant and complies with Duty to Cooperate. Plan is unsound.	Comments: Concern over the inconsistent wording with Policy ST2 regarding housing and whether and how additional growth is supported/achieved?	Suggested changes: <ul style="list-style-type: none"> • There should be consistency between Policy ST1 and ST2 regarding the housing figures. • Remove the requirement for local community support for development 	Officer comments: It is considered that the January 2022 Addendum and May 2022 Second Addendum addresses the matter relating to housing figures. Policy ST2 Part 3 provides flexibility in accommodating additional growth in the rural area should the growth requirement be met. It is considered that a proposed suggested change to Policy ST2 will address the matter of community consultation: In the case of 3b i-vi above, a developer-led pre-application consultation should be undertaken for major residential development in accordance with the Statement of Community Involvement to evidence the level of community support for the proposal.

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name: Representation Reference: REF045.4 Name: Agent on behalf of land owner	Refers to: POLICY ST1: Bassetlaw's Spatial Strategy and POLICY ST2: Residential Growth in Rural Bassetlaw - Ranskill/Settlement Hierarchy	Legal compliance and soundness: Plan is legally compliant and complies with the Duty to Cooperate. Plan is Unsound.	Comments: Ranskill should be a Large Rural Settlement due to its size and level of services and facilities.	Suggested changes: Ranskill should be defined as a 'Large Rural Settlement' in the hierarchy.	Officer comments: The Spatial Strategy Background Paper sets out the qualifying criteria for a 'large rural settlement'. Ranskill has been identified as a 'small rural settlement' due to the level of services and facilities present.
Representation Reference: REF047.1 Name: Welbeck Estates	Refers to: POLICY ST2: Residential Growth in Rural Bassetlaw	Legal compliance and soundness: Plan is legally compliant and complies with Duty to Cooperate. Plan is Unsound.	Comments: Concern over the proposed 'cap' to growth in rural Bassetlaw which has been raised with the Council previously. More growth is needed in the rural area to provide a supply of a small and medium sized sites to balance the delivery of the larger strategic sites and the Garden Village. Need clarification on whether the prospective housing numbers for each settlement are inclusive or exclusive of the current commitments consented. Support allocation of Welbeck Colliery in Policy ST7 but consider it has capacity for greater growth than consented.	Suggested changes: Suggested previously that an exemption should be applied to any final cap, so as to not derail the commitments of an existing Neighbourhood Plan or force their review into a downward projection. This has not happened.	Officer comments: It is considered that the January 2022 Addendum and May 2022 Second Addendum addresses the matter relating to housing figures. The Five Year Housing Land Supply Position Statement, 2021 states that there are 981 commitments on sites of less than 9 dwellings, with all being less than 1 hectare in size. Together with small site allocations in neighbourhood plans, the Local Plan and the Worksop Central DPD, this ensures that sites less than 1 hectare

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
					contribute more than 10% towards meeting the housing requirement. It is considered that this will provide sufficient flexibility in terms of housing delivery alongside the strategic sites. The May 2022 Second Addendum withdraws the Garden Village from the Plan. The growth requirement is exclusive of commitments. Policy ST2 Part 3 provides flexibility in accommodating additional growth in the rural area should the growth requirement be met. As such it is considered there is no 'cap'.
Representation Reference: REF048.7 Name: Nottinghamshire County Council	Refers to: POLICY ST2: Residential Growth in Rural Bassetlaw	Legal compliance and soundness: Legal compliance – not specified. Soundness of plan – not specified.	Comments: Part 2 should require a need for suitable access for all people including appropriate connections and improvements to existing infrastructure to promote walking, cycling, and the use of public transport.	Suggested changes: Policy ST2, Part 2: “Development should provide suitable access for all people including appropriate connections and improvements to existing infrastructure to promote	Officer comments: It is considered that the May 2022 Second Addendum addresses this matter.

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name:		Compliance with Duty to Cooperate – not specified.		walking, cycling, and the use of public transport.”	
Representation Reference: NRF-REF007.1 Name: Resident	Refers to: Lound NP Referendum and inclusion of Lound in ST2 for Growth	Legal compliance and soundness: Legal compliance – not specified. Soundness of plan – not specified. Compliance with Duty to Cooperate – not specified.	Comments: Concern over the frequently changing level of growth proposed for Lound. Does not support the Lound Neighbourhood Plan and believes that development in villages like Lound should be limited to change of use developments and the reuse of agricultural buildings.	Suggested changes: <ul style="list-style-type: none"> • Drop LNP in its present form, or don't take it to referendum. • Examine Lounds inclusion as being ST2 small settlement, in light of past history. • Accommodate development through change of use of existing agricultural buildings on the main proposed site. 	Officer comments: The Spatial Strategy Background Paper sets out the qualifying criteria for a 'small rural settlement'. Lound has been identified as a 'small rural settlement' due to its limited level of services and facilities. The Lound Neighbourhood Plan is community led; it is not in the Council's gift to determine how the plan should be taken forward.
Representation Reference: NRF-REF010.1 Name: Residents	Refers to: POLICY ST2: Residential Growth in Rural Bassetlaw	Legal compliance and soundness: Plan is unsound. Legal compliance and compliance with Duty to Cooperate – not specified.	Comments: Concern over the change proposed with regards to the addition of "pre-application developer-led consultation" with the community to Policy ST2 Part 3. The group feel that this should be removed and that any additional growth should only be supported through the Neighbourhood Planning process to support Localism.	Suggested changes: Policy ST2 Rural Bassetlaw: the reference to a "developer-led" consultation should be removed.	Officer comments: It is considered that a reference to developer-led consultation is appropriate for those settlements that do not currently have a Neighbourhood Plan or where it is demonstrated that a neighbourhood plan is not delivering homes on

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name:					their allocations after a two-year period. It is considered that this matter has been appropriately addressed through the May 2022 Second Addendum.
Representation Reference: NRF-REF011.1 Name: Walkeringham Parish Council	Refers to: POLICY ST2: Residential Growth in Rural Bassetlaw	Legal compliance and soundness: Legal compliance – not specified. Soundness of plan – not specified. Compliance with Duty to Cooperate – not specified	Comments: The Draft Local Plan is now out of line with the adopted Walkeringham Neighbourhood Plan. The Local Plan has adopted a 5% maximum growth whereas Walkeringham’s NP is much higher. This was based on advice from the Planning/NP Team at BDC during the development of the NP. Would like to understand which takes precedence when considering planning determinations and whether or not that the higher levels that many rural parishes have adopted is fair.	Suggested changes: Provide clarity regarding the percentage growth requirement in Walkeringham	Officer comments: The made Walkeringham Neighbourhood Plan takes precedence as this document is still less than two years old. Once the Bassetlaw Local Plan is adopted, then its policies will take precedence from a strategic perspective. It will be then up to the community whether they wish to review the existing Neighbourhood Plan to reflect Local Plan policy changes that may affect Walkeringham.
Representation Reference: NRF-REF014.3 Name: East	Refers to: POLICY ST2: Residential Growth in Rural Bassetlaw	Legal compliance and soundness: Legal compliance – not specified.	Comments: Concern that the proposed 5% will not be a cap on development in the village. Concern over developments impact on infrastructure and drainage.	Suggested changes: <ul style="list-style-type: none"> • Improve highway access routes into East Markham • Improve the sewage system in East Markham 	Officer comments: Any infrastructure, flooding and drainage issues related to development will be addressed through future planning applications. Policy

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Markham Parish Council		Soundness of plan – not specified. Compliance with Duty to Cooperate – not specified		<ul style="list-style-type: none"> • Address flooding issues in East Markham 	ST2 supports the % growth for each community, but also supports additional growth either via a Neighbourhood Plan or where a community supports additional growth beyond that identified within Policy ST2. As such it is considered there is no 'cap'.
Representation Reference: NRF-REF014.4 Name: East Markham Parish Council	Refers to: POLICY ST2: Residential Growth in Rural Bassetlaw - Housing development in East Markham	Legal compliance and soundness: Legal compliance – not specified. Soundness of plan – not specified. Compliance with Duty to Cooperate – not specified	Comments: The Parish Council is of the opinion that East Markham should be classified as a village not suitable for further development from 2020 and for the life of this plan.	Suggested changes: Remove East Markham from Policy ST2	Officer comments: The Spatial Strategy Background Paper sets out the qualifying criteria for a 'small rural settlement'. East Markham has been identified as a 'small rural settlement' due to the level of services and facilities present. It should not be removed from Policy ST2.
Representation Reference: NRF-REF014.5 Name: East Markham Parish	Refers to: Small and medium sized enterprises	Legal compliance and soundness: Legal compliance – not specified.	Comments: Policy ST2 doesn't mention business and employment opportunities for rural communities.	Suggested changes: There needs to be a greater emphasis [in Policy ST2] on providing opportunities for small start-up businesses with high speed internet connections and excellent	Officer comments: Rural employment growth is managed separately through Local Plan Policy ST10 and Policy ST11.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Council		Soundness of plan – not specified. Compliance with Duty to Cooperate – not specified		connectivity to the wider area.	
Representation Reference: NRF-REF024.2 Name: IBA Planning	Refers to: POLICY ST2: Residential Growth in Rural Bassetlaw - Growth % requirement number	Legal compliance and soundness: Legal compliance – not specified. Soundness of plan – not specified. Compliance with Duty to Cooperate – not specified	Comments: Concern over the reduction in growth for Small Rural Settlements from 20% to 5%. This will limit the level of infrastructure in communities and will lead to villages becoming stagnated over time.	Suggested changes: <ul style="list-style-type: none"> • Increase the requirement in small rural settlements from 5% to 20%. • Make the 20% growth a cap rather than a minimum requirement. 	Officer comments: Housing growth is distributed according to the settlement hierarchy based upon ability to deliver sustainable development and growth, appropriate to the size of settlements, and availability of services and facilities. It is considered that this is in accordance with the NPPF. Part 2 of Policy ST2 is considered to provide an appropriate criteria based approach to assess housing proposals in the rural area. Policy ST2 Part 3 provides flexibility in accommodating additional growth in the rural area should the growth requirement be met.

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name: Representation Reference: NRF-REF024.3 Name: IBA Planning	Refers to: POLICY ST2: Residential Growth in Rural Bassetlaw - Number of Small Rural Settlements with growth requirement	Legal compliance and soundness: Legal compliance – not specified. Soundness of plan – not specified. Compliance with Duty to Cooperate – not specified	Comments: Concern over the reduction in the number of settlements that qualify as a ‘small rural settlement’. This should be increased to include Welham, Mattersey Thorpe, Hablesthorpe and Woodbeck.	Suggested changes: Increase the number of small rural settlements in Policy ST2 back to 42. Include Welham, Mattersey Thorpe, Hablesthorpe and Woodbeck in the small rural settlements in Policy ST2.	Officer comments: The Spatial Strategy Background Paper sets out the assessment criteria for the settlements in rural Bassetlaw. These looked at their size and the level of services and facilities. Settlements not listed in Policy ST2, are considered to be too small to accommodate any planned growth and should be managed through countryside policies. Where a Neighbourhood Plan seeks to support rural development within these settlements, then this will be supported if it can be justified on a sustainable basis.
Representation Reference: NRF-REF024.4 Name: IBA Planning	Refers to: POLICY ST2: Residential Growth in Rural Bassetlaw - Point (e)	Legal compliance and soundness: Legal compliance – not specified.	Comments: Concern about the amendments made to the criteria in Policy ST2 applicable when the percentage housing requirement for an eligible settlement has been reached. The inclusion of a developer-led consultation will limit the level of additional growth	Suggested changes: Change the criteria back to that used in the January 2020 Regulation 18 version of the Bassetlaw Local Plan.	Officer comments: It is considered that a reference to developer-led consultation is appropriate for those settlements that do not currently have a Neighbourhood Plan or

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
		<p>Soundness of plan – not specified.</p> <p>Compliance with Duty to Cooperate – not specified</p>	<p>opportunities and the new criteria is very restrictive. The Council should consider reinstating the previous wording to Policy ST2(E) set out in the January 2020 Local Plan.</p>		<p>where it is demonstrated that a neighbourhood plan is not delivering homes on their allocations after a two-year period. But it is acknowledged that this matter should be clarified; the May 2022 Second Addendum amends Policy ST2 Part 3 accordingly.</p>

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Representation Reference: 1918508.1 Name: Resident	Refers to: POLICY ST3: Bassetlaw Garden Village Design Framework	Legal compliance and soundness: Legal compliance - not specified. Plan is unsound. Compliance with Duty to Co-operate - not specified.	Comments: No justification for a new settlement on open farmland, which will urbanise the area between Retford and Worksop. It will visually spoil an open area of land.	Suggested changes: Many other villages with existing facilities that could be expanded. Dunham on Trent as an example has a school, shop pub, village hall and acres of land between them all. The villages surrounding Retford have space for expansion and some would welcome more population to keep facilities open. There is also brownfield sites at Bevercotes colliery site that could support a new village.	Officer comments: The May 2022 Second Addendum withdraws the Bassetlaw Garden Village from the Local Plan. Policy ST2 address the appropriate growth of rural settlements. The January 2022 Addendum allocates the former Bevercotes Colliery as an employment site consistent with the planning permission for the site.
Representation Reference: REF007.3 Name: National Highways	Refers to: POLICY ST3: Bassetlaw Garden Village Design Framework	Legal compliance and soundness: Legal compliance and soundness - not specified. Compliance with Duty to Co-operate - not specified.	Comments: The Bassetlaw Garden Village has been proposed to accommodate a total of 4,000 dwellings, a minimum of 500 have been allocated for this Local Plan period. Any development coming forward on this site should note that as the eastern boundary abuts the A1 trunk road, boundary treatment works and drainage will need to be considered to ensure the structural integrity of the network is not compromised.	Suggested changes: None	Officer comments: The May 2022 Second Addendum withdraws the Bassetlaw Garden Village from the Local Plan.

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Representation Reference: REF008.6 Name: BDC and County Councillor	Refers to: Policy ST3: Bassetlaw Garden Village Design Framework section 1.	Legal compliance and soundness: Legal compliance and soundness - not specified. Compliance with Duty to Co-operate - not specified.	Comments: No justification for the proposed housing estate in open country. Around the urban centres such as Doncaster, Sheffield, Rotherham, Nottingham are areas of green belt. There is no such protection for the remaining open Country in Bassetlaw. The "proposed New Town" would be situated in attractive countryside 1 mile West of the existing Retford residential areas at Babworth Crossing. This would create a continuous urban area between Retford and Worksop, taking into consideration the industrial extension proposed in the plan at 5 Lane Ends.	Suggested changes: None	Officer comments: I The May 2022 Second Addendum withdraws the Bassetlaw Garden Village from the Local Plan.
Representation Reference: REF008.9 Name: BDC and County Councillor	Refers to: POLICY ST3 Bassetlaw Garden Village Design Framework Paragraph 5.3.32	Legal compliance and soundness: Legal compliance and soundness - not specified. Compliance with Duty to Co-operate - not specified.	Comments: A station has been suggested but is unlikely to be delivered as it is so close to existing stations in Retford and Worksop. Funding is short for existing required upgrades all through the Northern Rail area. The upgrades that are likely to take place are late. The station is likely to be undeliverable in any future timescale.	Suggested changes: None	Officer comments: The May 2022 Second Addendum withdraws the Bassetlaw Garden Village from the Local Plan.
Representation Reference: REF010.2	Refers to: POLICY ST3: Bassetlaw Garden Village	Legal compliance and soundness: Legal compliance of plan - not specified.	Comments: Support the principles outlined within Policy ST3 bullet points c and f as these highlight the need to incorporate resilient design, SuDS, integrated	Suggested changes: None	Officer comments: The May 2022 Second Addendum withdraws the Bassetlaw Garden

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name: Severn Trent	Design Framework	Soundness of plan - not specified. Compliance of plan with Duty to Co-operate - not specified.	green/blue infrastructure. Support paragraph 5.3.16; the need for development to provide integrated flood management and SuDS as part of an appropriate drainage plan and that tie into the phasing of larger development sites. Support the need for water efficient design and integrated green/blue infrastructure in paragraph 5.3.29 so that the garden village is designed to be resilient to the impacts of climate change.		Village from the Local Plan.
Representation Reference: REF014.2 Name: National Trust	Refers to: POLICY ST3: Bassetlaw Garden Village Design Framework	Legal compliance and soundness: Legal compliance of plan - not specified. Plan is unsound. Compliance with Duty to Co-operate - not specified.	Comments: No in principal objection to the concept of a Garden Village if required to meet the future housing needs of the district within and beyond the plan period. Support the use of a Consultation Group to help steer development proposals; support proposals to employ a heritage-led landscape scheme, a low carbon energy network of an integrated transport Hub to promote sustainable travel choices. Should a Garden Village close to the A1 be found to be sustainable and deliverable, support the key design principles contained in Policy ST3. Based on the current Local Plan evidence base, and in the context of the current development strategy, do not	Suggested changes: The levels of growth proposed by Bassetlaw Local Plan should be reviewed and reduced to reasonable levels. The justification for a Garden Village would also need to be reviewed within this context.	Officer comments: The May 2022 Second Addendum withdraws the Bassetlaw Garden Village from the Local Plan.

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name:			consider that the Bassetlaw Garden Village proposal has been justified.		
Representation Reference: REF018.1 Name: Newark & Sherwood District Council	Refers to: POLICY ST3: Bassetlaw Garden Village Design Framework	Legal compliance and soundness: Not specified - a holding representation was received.	Comments: The proposed allocation of the Bassetlaw Garden Village through the Bassetlaw Local Plan remains a strategic cross boundary matter, with respect to its potential impact on the Birklands & Bilhaugh Special Area of Conservation and the Clumber Park Site of Special Scientific Interest.	Suggested changes: None	Officer comments: The May 2022 Second Addendum withdraws the Bassetlaw Garden Village from the Local Plan.
Representation Reference: REF021.1 Name: Sport England	Refers to: POLICY ST3: Bassetlaw Garden Village Design Framework	Legal compliance and soundness: The plan is considered legally compliant, sound and complies with the Duty to Cooperate.	Comments: The policy is supported.	Suggested changes: None	Officer comments: The May 2022 Second Addendum withdraws the Bassetlaw Garden Village from the Local Plan.
Representation Reference: REF023.6 Name: Muller Property Group on behalf of land owner	Refers to: POLICY ST3: Bassetlaw Garden Village Design Framework	Legal compliance and soundness: Plan is legally compliant and complies with the Duty to Cooperate. Plan is unsound.	Comments: In light of NPPF, do not object in principle to the Garden Village within Bassetlaw. Concern due to its location on a greenfield site that is located away from existing settlements. The principal reason for choosing the site is its proximity to the strategic road network, which raises issues over whether this it is the most sustainable choice. As a new site, there are no existing services,	Suggested changes: Do not consider the Plan sound as it will not be effective in delivering the growth set out over the Plan Period. Consider that alternative SUEs around the more sustainable settlements such as the land north of Bigsby Road in Retford should be	Officer comments: The May 2022 Second Addendum withdraws the Bassetlaw Garden Village from the Local Plan. As there is an 18% buffer in the supply further allocations are not considered necessary. It is considered the

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			facilities or infrastructure, everything will need to be created from scratch. In time this is feasible, note that 500 dwellings will be delivered on the site in the emerging Plan Period, but that a further 3,500 dwellings are planned for the next Plan.	considered as an alternative allocation.	Sustainability Appraisal, Land Availability Assessment and Site Selection Methodology are consistent with national policy and provide a robust basis to determine the most sustainable sites to be allocated to meet the identified housing need.
Representation Reference: REF033.1 Name: Stone Planning Services Limited on behalf of Charterpoint (NG22) Limited	Refers to: POLICY ST3: Bassetlaw Garden Village Design Framework POLICY ST4: Bassetlaw Garden Village	Legal compliance and soundness: Plan is legally compliant and complies with Duty to Cooperate. Plan is unsound.	Comments: The post-hearing letter of Inspector Mr Roger Clews 15 May 2020, in relation to the North Essex Garden Communities EiP are relevant to the Garden Village. Where a plan is to be deliverable: "it has to be taken to include the policies and proposals in the plan. It would not make sense only to require that the plan document itself is deliverable, if the policies and proposals it contains are not" (para 27). In relation to the assessment of effectiveness over the plan period, at para 28: "It was suggested that this means that I need not consider whether the GC proposals in the Plan are deliverable beyond the	Suggested changes: The policy provides for a Garden Community, this does not mean that the policy or the Garden Community is deliverable. The test of soundness needs to be applied to the local plan timescale and the elements of the plan that are conceived and started up to 2037 and the delivery thereafter.	Officer comments: The May 2022 Second Addendum withdraws the Bassetlaw Garden Village from the Local Plan.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>end date of the Plan in 2033. In my view, the Plan could not be considered to be sound if I were to find that the proposed GCs were justified having regard to their ability to provide for strategic development over many decades to come, but reached no finding on whether or not they were deliverable beyond 2033". The fact that policy provides for a Garden Community, does not mean that the policy or indeed the Garden Community is deliverable. The August 2021 Publication Plan Sustainability Appraisal non-technical summary para 1 sets out the long-term spatial vision and objectives for Bassetlaw as well as the policies that will deliver that vision to 2037. It follows that the appraisal is concerned with the local plan to 2037 and beyond. The test of soundness needs to be applied to that timescale and the elements that start up to 2037 and the delivery after.</p>		
<p>Representation Reference: REF039.1</p> <p>Name: Natural England</p>	<p>Refers to: POLICY ST3 Bassetlaw Garden Village Design Framework</p>	<p>Legal compliance and soundness: Plan is Legally Compliant and complies with the Duty to Cooperate.</p>	<p>Comments: Note that the current wording in paragraph 5.3.17 says that new habitats can be managed to minimise breeding opportunities. Assume this is a typographical error and it should say</p>	<p>Suggested changes: Natural England suggest a change from "minimise" to "maximise" within this paragraph.</p>	<p>Officer comments: The May 2022 Second Addendum withdraws the Bassetlaw Garden Village from the Local Plan.</p>

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
		Soundness - not specified.	that new habitats can be managed to maximise breeding opportunities.		
Representation Reference: REF040.6 Name: McLoughlin Planning on behalf of land owner	Refers to: POLICY ST3: Bassetlaw Garden Village Design Framework POLICY ST4: Bassetlaw Garden Village	Legal compliance and soundness: Legal compliance of plan - not specified. Soundness of plan - not specified. Compliance of plan with Duty to Co-operate - not specified.	Comments: The initial vision statement (September 2021) is in place but further detailed guidance (like the Worksop Town Centre DPD) is not yet evident. It is noted that the Council do not expect development until 2032 and delivery planned for the next 20 years. Policies ST3 and ST4 offer overall master planning guidance but advise that the Bassetlaw Garden Village framework, including a governance and stewardship plan is yet to be agreed with the Local Authority and the Bassetlaw Garden Village Consultative Group. The lacking management plan and guidance on deliverability conflicts with paragraph 22 of the NPPF. Paragraph 22 advises that for new villages, or larger extensions to villages and towns, policies should look ahead within a vision document at least 30 years to consider the likely timescale for delivery. The vision document only looks 20 years ahead. This, in conjunction with the supporting	Suggested changes: <ul style="list-style-type: none">bring forward site LAA206 (preferred option) on the edge of Worksop as an allocation to reduce the risk of future under delivery as part of Local Plan policy HS15. It is deliverable and has a reliable housing developer ready to bring the site forward.Make amendments to the proposed planning policy map to address the issues associated with emerging Local Plan policies GG4 and ST38.	Officer comments: The May 2022 Second Addendum withdraws the Bassetlaw Garden Village from the Local Plan. As there is an 18% buffer in the supply further allocations are not considered necessary. It is considered the Sustainability Appraisal, Land Availability Assessment and Site Selection Methodology are consistent with national policy and provide a robust basis to determine the most sustainable sites to be allocated to meet the identified housing need.

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name:			documentation yet to be produced for the masterplan means the allocation fails to comply with the NPPF and raises doubts on the site's deliverability.		
Representation Reference: NRF-REF008.2 Name: Retford Civic Society	Refers to: POLICY ST3: Bassetlaw Garden Village Design Framework	Legal compliance and soundness: Legal compliance of plan - not specified. Soundness of plan - not specified. Compliance of plan with Duty to Co-operate - not specified.	Comments: Support in principle a new village at Five Lanes End. It is essential that this development does not start until there is a mechanism in place to ensure that retail and other community facilities, including public transport services, are in place at an early stage to serve residents. This should be clearly stated in the Plan. There must be no possibility of the development ending up as a housing estate in the countryside.	Suggested changes: The policy should require retail and other community facilities, including public transport services, to be in place at an early stage to serve residents.	Officer comments: The May 2022 Second Addendum withdraws the Bassetlaw Garden Village from the Local Plan.
Representation Reference: NRF-REF014.6 Name: East Markham Parish Council	Refers to: POLICY ST3: Bassetlaw Garden Village Design Framework	Legal compliance and soundness: Legal compliance of plan - not specified. Soundness of plan - not specified. Compliance of plan with Duty to	Comments: Given current financial conditions a garden village is an expensive venture. Little chance of government or developer contributions funding to support the level of investment required. The economic development given its proximity to the A1 would attract logistic companies not noted for their high skill high wages, a theme in the plan. There is no indication that the railway company or the Government	Suggested changes: None	Officer comments: The May 2022 Second Addendum withdraws the Bassetlaw Garden Village from the Local Plan.

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name:		Co-operate - not specified.	will provide the necessary funding for a station at this site.		
Representation Reference: NRF-REF019.3 Name: Rotherham Metropolitan Borough Council	Refers to: POLICY ST3: Bassetlaw Garden Village Design Framework	Legal compliance and soundness: Legal compliance of plan - not specified. Soundness of plan - not specified. Compliance of plan with Duty to Co-operate - not specified.	Comments: Paragraph 5.3.33 is welcomed, the requirement for a new bus service could be strengthened. Note that a Habitats Regulations Assessment Screening Assessment and Appropriate Assessment has been completed, and the outcomes identify key concerns; it is anticipated that the recommendations will be taken into account. Await the outcome of the Recreational Impact Assessment and further details of alternative green space provision and mitigation to reduce the impact on the Clumber Park SSSI, Sherwood Forest ppSPA, Birklands and Bilhaugh SAC and the Sherwood Forest NNR.	Suggested changes: Paragraph 5.3.33 is welcomed although wording for the requirement for a new bus service could be strengthened.	Officer comments: The May 2022 Second Addendum withdraws the Bassetlaw Garden Village from the Local Plan. The Recreational Impact Assessment has been shared with Rotherham for their views, finalised and now forms part of the Local Plan evidence base.
Representation Reference: NRF-REF026.3 Name: Savills on behalf of R Girdham and the Mason Family	Refers to: POLICY ST3: Bassetlaw Garden Village Design Framework	Legal compliance and soundness: Legal compliance of plan - not specified. Soundness of plan - not specified.	Comments: Fully support the allocation of the Bassetlaw Garden Village. Approve the Garden City Principles being set out as part of the pretext to the policy reflecting our client's commitment to ensuring that development is undertaken in a sympathetic and sustainable way, clearly setting the scene for the following policies. Support reference to Sport England's Active	Suggested changes: None	Officer comments: The May 2022 Second Addendum withdraws the Bassetlaw Garden Village from the Local Plan, following the decision of one landowner to withdraw their land from the process.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
		Compliance of plan with Duty to Co-operate - not specified.	Design Principles which are the basis for healthy place making and important in tackling health inequalities. Support Policy ST3 clarifying specific principles for the Bassetlaw Garden Village.		

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Representation Reference: REF1946246.3 Name: Barton Wilmore on behalf of Heyford Developments	Refers to: POLICY ST4: Bassetlaw Garden Village	Legal compliance and soundness: Plan is legally compliant. Plan is unsound. Plan complies with the Duty to Cooperate.	Comments: The evidence base, particularly the IDP and Viability Assessment do not demonstrate there is a reasonable prospect that the proposals will be developed. Consider that the 500 dwellings should be deleted from the supply and the site should be considered an ambition for growth beyond the Plan period, with further detail to be set out through a DPD or similar. Policy ST4 is not justified or effective due to the lack of proportionate evidence to demonstrate deliverability.	Suggested changes: Address the significant concerns in relation to the IDP and Viability Assessment regarding the infrastructure requirements and deliverability of the proposed Garden Village. Further detail is required to demonstrate that it can contribute 500 dwellings within the Plan period in a sustainable manner in line with the Garden Community Principles set out in Policy ST3.	Officer comments: The May 2022 Second Addendum withdraws the Bassetlaw Garden Village from the Local Plan.
Representation Reference: REF001.1 Name: Canal and River Trust	Refers to: POLICY ST4: Bassetlaw Garden Village	Legal compliance and soundness: Plan complies with the Duty to Cooperate. Plan is legally compliant. Plan is sound.	Comments: Due to its rural location, existing walking and cycling routes are designed for low levels of use, which could be adversely impacted by the additional use from the development unless appropriate mitigation is undertaken. Additional use could result in additional liabilities, including the erosion of surfaces, which could discourage long-term use of the local network for travel and leisure.	Suggested changes: The supporting text and inclusion of Policy ST4 makes explicit the need for development to promote off-site improvements to the existing walking and cycling infrastructure in vicinity of the proposed Garden Village. Specifically, part r (viii) of policy ST4 refers to the need for development to promote public rights of	Officer comments: The May 2022 Second Addendum withdraws the Bassetlaw Garden Village from the Local Plan.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
				way improvements within the site and through connections to the network outside the site boundary. This inclusion would address this matter, and ensure that local infrastructure is considered appropriately.	
Representation Reference: REF008.7 Name: BDC and County Councillor	Refers to: Policy ST4: Bassetlaw Garden Village section r) point i.	Legal compliance and soundness: Legal compliance of plan - not specified. Soundness of plan - not specified. Compliance of plan with Duty to Co-operate - not specified.	Comments: Realigning the road into the centre of the "Garden Village" would be a mistake. It should be left as a fast route to the A1 junction for other communities. Every community complains of speeding vehicles and Heavy lorries. They want them slowing down, and that they are required to use alternative routes. It is a mistake to direct traffic into a residential area.	Suggested changes: None	Officer comments: The May 2022 Second Addendum withdraws the Bassetlaw Garden Village from the Local Plan.
Representation Reference: REF008.8 Name: BDC and County Councillor	Refers to: POLICY ST4: Bassetlaw Garden Village Point 1.	Legal compliance and soundness: Legal compliance of plan - not specified.	Comments: The housing on this garden village is not required numerically; there is not a reason given to supply this facility to a population from outside Bassetlaw. The provision of the garden village is promoted by a private entity and much could change in the design and	Suggested changes: None	Officer comments: The May 2022 Second Addendum withdraws the Bassetlaw Garden Village from the Local Plan.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
		<p>Soundness of plan - not specified.</p> <p>Compliance of plan with Duty to Co-operate - not specified.</p>	<p>density of this development during the planning and application process to render it a normal housing estate as with so many other grand schemes.</p>		
Representation Reference: REF010.5 Name: Severn Trent	Refers to: POLICY ST4: Bassetlaw Garden Village	Legal compliance and soundness: <p>Legal compliance of plan - not specified.</p> <p>Soundness of plan - not specified.</p> <p>Compliance of plan with Duty to Co-operate - not specified.</p>	Comments: <p>Support the principles in Policy ST4 bullet points e, i and j which highlight the need to incorporate green/blue infrastructure, develop suitable drainage plans, informed by a flood risk assessment and surface water management masterplan.</p> <p>The underlying strata for the garden village is indicated to have the potential to infiltrate; the site is within a Source Protection Zone, any surface water drainage system designed to infiltrate will need to incorporate appropriate treatment trains to protect the underlying aquifer.</p>	Suggested changes: <p>Add a bullet point to highlight the need to deliver water efficiency in this development, ensuring that vital water resources are used sustainably. The drainage strategy should follow the drainage hierarchy and ensure surface water flows are not directed to sewers wherever possible.</p>	Officer comments: <p>The May 2022 Second Addendum withdraws the Bassetlaw Garden Village from the Local Plan.</p>
Representation Reference: REF014.3 Name: National Trust	Refers to: POLICY ST4: Bassetlaw Garden Village	Legal compliance and soundness: <p>Legal compliance of plan - not specified.</p> <p>Plan is unsound.</p>	Comments: <p>No in principal objection to a Garden Village if required to meet the future housing needs of the district within and beyond the plan period. Support a Consultation Group to help steer development proposals; support</p>	Suggested changes: <ul style="list-style-type: none"> • Reconsider the scale of greenfield land release across the plan area, ensuring that this is proportionate to the needs of the district for 	Officer comments: <p>The May 2022 Second Addendum withdraws the Bassetlaw Garden Village from the Local Plan.</p>

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
		Compliance with Duty to Co-operate - not specified.	<p>proposals to employ a heritage-led landscape scheme, a low carbon energy network of an integrated transport Hub to promote sustainable travel choices. Concerned that the scale and spatial configuration of the site in combination with Apleyhead Junction, will close the gap between Worksop and Retford creating urban sprawl from Worksop to the A1 and onwards to within 2.5km of Retford. Both developments will increase traffic and associated air pollution on the A1 and A57 corridors and junction. Involves the loss of Best and Most Versatile Agricultural Land. Large greenfield housing allocations e.g. Ordsall South could impact on the delivery of the Garden Village as a sustainable settlement due to the relatively high levels of infrastructure required. Cautiously welcome the requirement for a Suitable Alternative Natural Greenspace to lessen recreational impacts on Clumber Park subject to the recommendations of the Recreational Impact Assessment that has not yet been published. Cautiously welcome the requirement that recreational impacts on Clumber Park SSSI should be managed and</p>	<p>new housing and employment. Urban sprawl should be resisted and green gaps should be maintained between distinctive settlements.</p> <ul style="list-style-type: none"> • The distance between Clumber Park SSSI and the Garden Village at its closest point appears to be more than 700m, suggest the stated distance of 400m should be increased or replaced with a stated landscape buffer within the Garden Village site, in order to make it a meaningful mitigation measure. • Part e(iv) is cautiously welcomed, may need to be reframed slightly to ensure that the meaning of the original Habitats Regulations Assessment recommendation has not been lost. Part 2e(iv) should be clarified to state that 'no habitat suitable for breeding by ground nesting birds 	

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>mitigated. Concerned that the Recreational Impact Assessment that will inform management/mitigation are not known, particularly as Parts 2r(vi) and 2r(vii) of the policy promote high levels of accessibility between the Garden Village and Clumber Park.</p>	<p>associated with Clumber Park SSSI and Sherwood Forest ppSPA is created within 400m of housing development’.</p> <ul style="list-style-type: none"> • Welcome the requirement for a project level Habitats Regulations Assessment (Part 2g). However the policy should require not just an assessment of impact, but also ‘appropriate mitigation’ to address any identified impacts. • Amend policy including Part 2j if required in response to findings and recommendations of Recreational Impact Assessment. • Review Parts 2h, 2r(vi) and 2r(vii) if necessary to ensure that they are appropriate once the Recreational Impact Assessment has been published. 	

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name:				<ul style="list-style-type: none"> Part h should refer to Sherwood Forest ppSPA. 	
Representation Reference: REF016.1 Name: Network Rail	Refers to: POLICY ST4: Bassetlaw Garden Village	Legal compliance and soundness: Plan is legally compliant. Plan is sound. Plan complies with Duty to Co-operate.	Comments: Support the policies and proposals that affect our infrastructure and consider these to be positively prepared, justified, effective and consistent with national policy. Pleased with the safeguards put in place in respect of level crossings relating specifically to the Bassetlaw Garden Village.	Suggested changes: None	Officer comments: The May 2022 Second Addendum withdraws the Bassetlaw Garden Village from the Local Plan.
Representation Reference: REF021.2 Name: Sport England	Refers to: POLICY ST4: Bassetlaw Garden Village	Legal compliance and soundness: The plan is considered legally compliant, sound and complies with the Duty to Cooperate.	Comments: The policy is supported.	Suggested changes: None	Officer comments: The May 2022 Second Addendum withdraws the Bassetlaw Garden Village from the Local Plan.
Representation Reference: REF023.7 Name: Muller Property Group on behalf of	Refers to: POLICY ST4: Bassetlaw Garden Village	Legal compliance and soundness: Plan is legally compliant and complies with the Duty to Cooperate.	Comments: The acknowledgement that the Garden Village is intended to deliver more development in the next Local Plan is welcomed, as experience elsewhere indicates that it can take years for large strategic greenfield sites of this scale to come on stream	Suggested changes: Consider that alternative SUEs around the more sustainable settlements such as the land north of Bigsby Road in Retford should be considered as an alternative allocation	Officer comments: The May 2022 Second Addendum withdraws the Bassetlaw Garden Village from the Local Plan. As there is an 18% buffer in the supply further allocations are not

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
land owner		Plan is unsound	due to new infrastructure needed to serve the development, especially where no existing facilities are present. As a longer term development option; should identify the site now but look to the next Plan Period for any development to meet future housing and employment land needs. This will provide greater certainty that the site will deliver in the longer term. Question whether the site will deliver 500 dwellings in this Plan Period. If not, a flexibility allowance should be added to the housing requirement in case it does not deliver. To maintain a five year supply, a flexibility allowance of at least 15% above the housing requirement would be appropriate to provide an allowance if some of the smaller allocations did not come forward and provide a buffer if the Garden Village did not come on stream. Additional sites should be allocated; the north of Bigsby Road, Retford is considered suitable.		considered necessary. It is considered the Sustainability Appraisal, Land Availability Assessment and Site Selection Methodology are consistent with national policy and provide a robust basis to determine the most sustainable sites to be allocated to meet the identified housing need.
Representation Reference: REF031.2 Name: Derek	Refers to: POLICY ST4: Bassetlaw Garden Village	Legal compliance and soundness: Plan is legally compliant and complies with the	Comments: Is there an identified need? The 5 year housing land supply is oversubscribed, with a supply of 1,677 dwellings over the 5 years or a 122% buffer. The	Suggested changes: 1. Omit the proposal for a Garden Village completely. 2. Redistribute residential and economic	Officer comments: The May 2022 Second Addendum withdraws the Bassetlaw Garden Village from the Local Plan.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Kitson Architectural Technologist Ltd		Duty to Cooperate. Plan is unsound.	Garden Village proposes 500 new homes in the plan period but is not included in the housing land availability numbers. The current housing supply is 11,698 dwellings over the plan period (excluding the Garden Village), at the average build out rate of 591 per annum this gives approximately 20 years supply. Economies of scale will win; house builders will choose a more favourable offer in the Garden Village over smaller developments in the existing settlements, resulting in large homes in the villages rather than smaller family homes or senior citizen homes. Services will dwindle as growth is capped and even stopped in some villages. The negative impact on existing rural settlements will be irreversible, this has not been considered. All Neighbourhood Plans show a need for affordable and senior citizen homes. If the rural services fail why would Neighbourhood Plans wish promote these homes where sole reliance on a motor car is essential. Improvements in public transport would assist. The site is greenfield and, is at odds with NPPF.	development into our existing rural settlements or identify other rural areas suitable for employment opportunities, possibly alongside main vehicular roads, A1 and A638. 3. Identify and accept the “cluster” aspect of village life and reliance in accordance with NPPF paragraph 79 making these policies more reflective of the aims of the NPPF.	

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name: Representation Reference: REF043.13 Name: Gladmans	Refers to: POLICY ST4: Bassetlaw Garden Village	Legal compliance and soundness: Plan is legally compliant and complies with Duty to Cooperate. Plan is unsound.	Comments: It is important that clear evidence is provided to demonstrate that any assumptions in the housing trajectory are realistic, accurately reflect the challenges associated with delivery and current planning status. This evidence should include Statements of Common Ground and appropriate sense checking should also be undertaken against local, regional and national evidence (eg lead in times and delivery rates in Lichfields 'Start to Finish' Report; and Savills Spotlight: Planning and Housing Delivery Report, Second Edition, February 2020). Potential for slippage will necessitate a flexible approach within the Local Plan to ensure they are responsive to rapid change and needs can be met in full over the plan period	Suggested changes: A flexible policy approach is required within the Local Plan's policies to ensure that they are responsive to rapid change and that development needs can be met in full over the plan period. Policies should take a responsive and flexible approach to sustainable development at the edge of suitable settlements to ensure that a positive response can be taken where monitoring indicates that the expected delivery from the proposed Garden Village has slipped.	Officer comments: The May 2022 Second Addendum withdraws the Bassetlaw Garden Village from the Local Plan.
Representation Reference: REF048.2 Name: Nottinghamshire County Council	Refers to: POLICY ST4: Bassetlaw Garden Village	Legal compliance and soundness: Plan is legally compliant and complies with Duty to Cooperate. Plan is unsound.	Comments: New settlements can contribute to meeting the need for new housing and can provide benefits over expansion of existing settlements in terms of infrastructure provision. The Garden Village is not expected to deliver housing until later in the Plan period which is realistic in terms of the time it takes to achieve advance planning and	Suggested changes: <ul style="list-style-type: none"> • Include a long term vision as per para 22 of NPPF to ensure that it covers the period during which the Garden Village will be fully delivered be accompanied by evidence of the impacts of the 4000 dwellings on 	Officer comments: The May 2022 Second Addendum withdraws the Bassetlaw Garden Village from the Local Plan.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>infrastructure provision. Para 22 of NPPF states <i>Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.</i> Appropriate studies need to be put in place to establish the framework for infrastructure funding and delivery over the 30 year delivery period. In the context of para 22 should be allocating 4000 dwellings with 500 expected to come forward to 2037. Technical evidence should provide understanding of the potential impacts of the full development upon the A1/A57/A614 junction, the A620/B6420 junction, the A57 Corridor and Retford which is the closest town. The Retford Transport Assessment has not taken into account the potential impacts of the Garden Village, regarding it as “possible development” (para 1.1.3) rather than an allocation rising to 4000 dwellings which is likely to have significant impacts on Retford. The</p>	<p>transport and movement in the surrounding area, particularly Retford and the A57 corridor.</p> <ul style="list-style-type: none"> • no development of the Garden Village should occur until a credible mechanism for the improvement and developer funding of the A57 has been secured • Part 2.r should include the removal of the double bends on the B6420 Mansfield Road at the junctions with Green Lane and Old London Road. Also reference Policy ST54 Part 1.i. • Part 2.r)ii. Junction improvements should be secured either by condition or planning obligation. • Part 2.r)iii/iv should include charging for electric buses. • Part 2.r)v should make it clear that the closure of the level crossings should 	

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>Bassetlaw Transport Study considers 500 dwellings at the Garden Village but is citing issues with junctions on the A57 with the Garden Village contributing. The potential impacts of the full allocation must be considered by the Plan in combination with the major allocations at Ordsall South, Peaks Hill Farm and Apleyhead. Unable to support the allocation until the impacts have been fully assessed and in the absence of a credible mechanism to improve the A57, unless the policy includes a restriction on development until it has been secured. All appropriate larger sites should make a proportionate and justified contribution towards the A57 Corridor improvements and other strategic transport improvements as set out in the BTS (or further transport assessments). These would be pooled, potentially through S106 mechanisms and NCC and Bassetlaw DC should jointly seek to secure other sources of funding during the Plan period to enable the delivery to fulfil the Bassetlaw Transport Study if a zero CIL rate is agreed.</p>	<p>retain pedestrian, cycle, and vehicular movements across the railway line rather than a protracted diversion.</p> <ul style="list-style-type: none"> • Part 2.r)viii should include appropriate pedestrian/cycle crossing facilities across the A1/ A1 Apleyhead Interchange. • Part 2.r)viii. demand management measures should be clarified. • Paragraph 5.3.37: only the Garden Village Rail Station and public transport hub is referred to (as well as the A57 corridor improvement project) in the emerging Strategic Improvement Plan. This should be amended. 	

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
<p>Representation Reference: REF048.2</p> <p>Name: Nottinghamshire County Council</p>	<p>Refers to: POLICY ST4: Bassetlaw Garden Village</p>	<p>Legal compliance and soundness: Plan is legally compliant and complies with Duty to Cooperate.</p> <p>Plan is unsound.</p>	<p>Comments: The Garden Village appears in both the BLP and BTS for 500 dwellings and 10 hectares of employment but there is no assessment of longer-term development impacts, unlike at Retford. The Garden Village is not taken into account <u>at all</u> in the Retford Transport Assessment (RTA). However, the site is located midway between Worksop and Retford. It is reasonable to assume that a large proportion of the traffic generated by the development would gravitate to and from Retford. In the absence of the Garden Village, the RTA is not capable of assessing the cumulative impact of the BLP allocations within Retford. Junctions that are like to experience capacity issues are identified in the RTA within Table 18. Due to the lack of a feasible means of physical improvement, the RTA proposes that unspecified demand management measures be employed to mitigate the traffic impact of the Retford allocations at the A620 Amcott Way / Bridlegate / A620 Hospital Road / A638 North Road / Hallcroft Road roundabout, the A620 Amcott Way / A620 Moorgate / A638</p>	<p>Suggested changes: The Retford Transport Assessment (RTA) must include an assessment of the potential impacts of the Garden Village proposal on junctions and traffic flows in Retford in order for the County Council to understand the mitigation required. Paragraph 7.14.17 The Retford Transport Assessment does not include the Garden Village (in the plan period or beyond) and assesses 1250 dwellings rather than the proposed 800 in the Plan period. This needs to be corrected.</p>	<p>Officer comments: The May 2022 Second Addendum withdraws the Bassetlaw Garden Village from the Local Plan. As such, it has been agreed with NCC that the focus of that assessment is the individual and cumulative impact of Retford site allocations on the network.</p>

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>Arlington Way, the A638 Arlington Way / Grove Street, and the A638 Arlington Way / A638 London Road / Carolgate junction complex. However, the predicted traffic impact at these junctions is based on vehicle trip rates that are considered low for Ordsall. The identified capacity issues would be compounded by the introduction of the Garden Village traffic which have not been accounted for. The Retford Transport Assessment raises serious doubt as to whether it would be possible to accommodate a further 3,500 dwellings on the Garden Village site in the next plan period without major investment in transport infrastructure to remove traffic from the town.</p>		
<p>Representation Reference: NRF-REF006.5</p> <p>Name: Barton Wilmore on behalf of Howard (Retford) Ltd</p>	<p>Refers to: POLICY ST3 and POLICY ST4 Bassetlaw Garden Village</p>	<p>Legal compliance and soundness:</p> <p>Legal compliance of plan - not specified.</p> <p>Soundness of the plan – not specified.</p> <p>Compliance with Duty to Co-</p>	<p>Comments:</p> <p>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.</p>	<p>Suggested changes: None.</p>	<p>Officer comments:</p> <p>The May 2022 Second Addendum withdraws the Bassetlaw Garden Village from the Local Plan.</p>

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
		operate - not specified.			
Representation Reference: NRF-REF009.1 Name: Resident	Refers to: POLICY ST3 and POLICY ST4 Bassetlaw Garden Village	<p>Legal compliance and soundness: Legal compliance of plan - not specified.</p> <p>Soundness of the plan – not specified.</p> <p>Compliance with Duty to Co-operate - not specified.</p>	<p>Comments: It is not clear why Bassetlaw is so determined to develop a new village. Earlier versions of the Plan proposed new villages at Gamston Airfield, Bevercotes colliery and Cottam power station but these have been dropped in favour of Five Lanes End. It is not needed as housing need can be met without it. It would lead to more travel by car than would be if the same number of houses were built in or next to existing built-up areas. The Plan suggests residents would benefit from good bus and train services, this is unrealistic. It is unlikely that a railway station would be viable even if the new village reached 4000 houses and would not be viable in the plan period. Many Bassetlaw villages have no bus services; those with a regular service are those on routes between larger centres. It is not on such a route. It is suggested that services would be subsidised by the development, but this is not sustainable in the long run. It is likely people would be wholly dependent on the car. Suggests extensive cultural,</p>	<p>Suggested changes: Remove Bassetlaw Garden Village allocation from the Local Plan</p>	<p>Officer comments: The May 2022 Second Addendum withdraws the Bassetlaw Garden Village from the Local Plan.</p>

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			recreational and shopping facilities but 500 homes may not support a shop. It will be a housing estate in the countryside and residents will become reliant on travel to larger centres for shopping, education, recreation and employment. It is not clear where the finance will come from to provide them. Villages that can sustain facilities are service centres and have a large population supporting their facilities. This new village will be a stand-alone community. High standards of design of buildings, landscape and the environment welcome, but should be in all development and do not require a new village. If housing numbers are reduced to the Government’s ‘standard method’, this could be achieved without wider implications.		
Representation Reference: NRF-REF018.2 Name: National Grid	Refers to: POLICY ST4: Bassetlaw Garden Village	Legal compliance of plan - not specified. Soundness of the plan – not specified.	Comments: The Bassetlaw Garden Village is crossed by National Grid assets. XE ROUTE: 275Kv Overhead Transmission Line. Route: High Marnham – Thurcroft – West Melton	Suggested changes: Propose amendments to the policy to include wording: <i>“A strategy for responding to the National Grid assets present within the site which demonstrates how the National Grid Design Guide and Principles have been</i>	Officer comments: The May 2022 Second Addendum withdraws the Bassetlaw Garden Village from the Local Plan.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
		Compliance with Duty to Co-operate - not specified.		<i>applied at the masterplanning stage and how the impact of the assets has been reduced through good design."</i>	
Representation Reference: NRF-REF022.4 Name: D2N2 LEP	Refers to: POLICY ST4: Bassetlaw Garden Village	Legal compliance and soundness: Legal compliance of plan - not specified. Soundness of the plan – not specified. Compliance with Duty to Co-operate - not specified.	Comments: D2N2 recognises multiple potentially significant developments in the area such as the Garden Village (Policy ST7/ST4) can play in helping to diversify the economy and delivering the expansion of key regional economic growth sectors.	Suggested changes: None	Officer comments: The May 2022 Second Addendum withdraws the Bassetlaw Garden Village from the Local Plan.
Representation Reference: NRF-REF026.4 Name: Savills on behalf of R Girdham and the Mason Family	Refers to: Policy ST4 Bassetlaw Garden Village	Legal compliance and soundness: Legal compliance of plan - not specified. Soundness of the plan – not specified.	Comments: Agree that the Garden Village will provide 500 dwellings over the plan period (to 2037). This should be a minimum by changing the wording from " <i>approximately</i> " to " <i>at least</i> " ... 500 dwellings to ensure the Garden Village has the opportunity to deliver more houses should it be in a position to do so. Part 2 of Policy ST4, may benefit from sub headings e.g.	Suggested changes: 1. Policy ST4: change the wording from " <i>approximately</i> " to " <i>at least</i> " ... 500 dwellings 2. Include headings within part 2 of Policy ST4	Officer comments: The May 2022 Second Addendum withdraws the Bassetlaw Garden Village from the Local Plan, following the decision of one landowner to withdraw their land from the process.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
		Compliance with Duty to Co-operate - not specified.	housing, employment, heritage, highways. Support the inclusion of the south eastern boundary which requires the provision of a 100m separation to the existing farmland as well as that which extends along the northern boundary. Support in principle range of different sustainable transport projects to help deliver the Garden Village, including a railway station, pedestrian/cycle bridge over the A1, re-routing Mansfield Road and new bus provision. Support reference to a comprehensive masterplan framework, which will build on from the Bassetlaw Garden Village Vision Statement and current indicative plan and that this must be agreed with the Local Planning Authority and the Bassetlaw Garden Village Consultative Group. Recognise that stewardship is vital to maintaining the quality of green infrastructure and community asset, so that our client's legacy is realised. Welcome part 4, dedicated to the management of the Garden Village. The site will be marketed at the end of October; the aim is to get a development partner on board by the end of the year. This will give confidence in the site coming forward		

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name:			and will allow for discussions in respect of the phasing to take place.		
Representation Reference: NRF-REF027.2 Name: Bassetlaw CCG	Refers to: POLICY ST4: Bassetlaw Garden Village	Legal compliance and soundness: Legal compliance of plan - not specified. Soundness of the plan – not specified. Compliance with Duty to Co-operate - not specified.	Comments: Fully support the recognition of healthcare facilities provision within Policy ST4 and green/blue infrastructure proposals. The provision of community health facilities gives flexibility to the CCG to meet changing community needs as services will grow and change to meet the needs of population growth. Whilst the use of facilities may change over time to support NHS and Community priorities it is known there will always be a need for health hub provision.	Suggested changes: None	Officer comments: The May 2022 Second Addendum withdraws the Bassetlaw Garden Village from the Local Plan.

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Representation Reference: REF001.2 Name: Canal and River Trust	Refers to: POLICY ST5: Worksop Central	Legal compliance and soundness: Plan complies with the Duty to Cooperate. Plan is legally compliant. Plan is sound.	Comments: The Chesterfield Canal flows through the centre of Worksop, and provides good access for residents and visitors to the wider Green Infrastructure network through the use of our towpaths, offers opportunities to encourage tourism, through the heritage assets associated with the canal corridor and from the use of leisure resources connected with the use of the canal.	Suggested changes: In order to ensure that the Plan is effective in maximising the benefits of the canal, believe that it is essential that policy is provided to provide guidance and certainty to developers and decision makers over how waterfront spaces should be incorporated into new development. The policy wording (part 2 (f)) provides detail as to what is expected within the Development Plan Document (DPD) and of developers with regards to the relationship between the town and the canal, which would help ensure that the local plan is effective in seeking to maximise such benefits.	Officer comments: Noted.
Representation Reference: REF010.6	Refers to: POLICY ST5: Worksop Central	Legal compliance and soundness: Legal compliance: not specified.	Comments: Generally supportive of Policy ST5 in particular bullet points f and h which highlight the need for multifunctional	Suggested changes: Recommend that redevelopment sites consider the drainage hierarchy and look to	Officer comments: This matter is covered by Policy ST53. All proposals should be considered against all relevant Local

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name: Severn Trent		Soundness: not specified. Compliance of plan with Duty to Co-operate: not specified.	green/blue infrastructure and looks to reduce flood risk.	utilise a sustainable outfall for surface water instead of assuming an automatic connection of surface water to the combined system, this approach will help to make urban areas more resilient to the impacts of climate change and help reduce the risk of sewer flooding.	Plan policies so it is not considered necessary to include the proposed change in Policy ST5. Additionally, Policy ST5 provides the overarching policy framework for the Workshop Central DPD. The DPD should address detailed policy matters relating to drainage in Workshop Central.
Representation Reference: REF014.4 Name: National Trust	Refers to: POLICY ST5: Workshop Central	Legal compliance and soundness: Legal compliance: not specified. Plan is sound. Compliance with Duty to Co-operate: not specified.	Comments: None	Suggested changes: None	Officer comments: Noted
Representation Reference: REF040.5 Name: McLoughlin Planning on	Refers to: POLICY ST5: Workshop Central	Legal compliance and soundness: Legal compliance: not specified Soundness: Plan is unsound	Comments: Looking beyond the initial first 5 years concerned that deliverability is unrealistic, with a high risk that these sites will not come forward during the plan period and are likely to be deliverable post 2037. With regard to Workshop Town Centre DPD, the housing	Suggested changes: <ul style="list-style-type: none"> The Council should bring forward site LAA206 (preferred option) on the edge of Workshop as an allocation to reduce the risk of under delivery as part of Local Plan policy 	Officer comments: Appendix 3 of the Local Plan contains the housing land supply trajectory. The updated trajectory in the January 2022 Addendum and May 2022 Second Addendum supersedes the

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
behalf of land owner		Compliance with Duty to Cooperate: not specified.	trajectory table (Appendix M of the Land Availability Assessment (2020)) advises that development will commence in 2026/2027. If the Local Plan's adoption is timetabled for 2023/2024, the supporting DPD will need to be amended and examined AFTER the Local Plans adoption to ensure compliance with the Local Plan. The DPD's continued inclusion in the housing trajectory appears to be a hangover from when the Council had hoped the Local Plan would be adopted in 2022. Development commencing in the earlier part of the plan period is unrealistic and may be exacerbated by time delays associated with examinations. The planned 600 homes in the Worksop DPD will not come through till the end of the plan period in 2037 or beyond.	HS15. This site is deliverable and has a reliable housing developer ready to bring the site forward. <ul style="list-style-type: none"> Amend the proposed policy map to address the issues associated with emerging Local Plan policies GG4 and ST38. 	trajectory referred to. It contains more up to date evidence on housing land supply including the proposed site allocations in the Worksop Central DPD (2020-2040) informed by build-out rates provided by developers and site promoters. The delivery rates are considered realistic and the Local Plan provides for an 18% buffer to provide flexibility. There is no need to allocate additional housing sites in Worksop.
Representation Reference: REF048.8 Name: Nottinghamshire County Council	Refers to: POLICY ST5: Worksop Central	Legal compliance and soundness: Not specified	Comments: Part 2j) the regeneration of the area would be likely to come forward by way of multiple planning applications, many of which could be of a minor nature. Would hope that the envisaged integrated area-wide transport network be funded by CIL. Reference to a "comprehensive network of cycling routes" needs to take account of the	Suggested changes: None	Officer comments: Policy ST58 indicates that infrastructure associated with a planning permission will be secured via a range of mechanisms, including planning conditions, developer contributions and the CIL. The Worksop Central DPD will confirm

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			limited space available for such routes within the built-up area?		the approach to be taken for the DPD site allocations. Worksop Central has limited cycle infrastructure. All new/improved provision will reflect the ability of the locality to physically accommodate the required infrastructure safely, following consultation with the Local Highways Authority.
Representation Reference: NRF-REF030.1 Name: Resident	Refers to: Land North of Turner Road: Policy W52 in Worksop Central DPD	Legal compliance and soundness: Not specified	Comments: National government, environmental bodies and the District Council are promoting the reduction of CO2, one way is PLANTING more trees. Its environmentally un-friendly to cut down, and up-root 50-60 young but flourishing trees (mainly oaks) in addition to many young saplings on site and the mature trees and bushes which surround the field which are home to wildlife to build a few extra houses on known heavy contaminated and polluted land (it was a Council Waste Tip Site); the pollutants still lie below the grass, to a depth of 20-30m in places. Over-heard two land surveyors agree that NO building could take place	Suggested changes: None	Officer comments: Land north of Turner Road is a proposed site allocation in the Worksop Central DPD, not the Local Plan. The Council's Environmental Health service confirm that the site is suitable for redevelopment subject to appropriate mitigation and management being secured via planning condition. The loss of trees will be re-provided in the locality, where considered appropriate.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>on this land unless several hundreds of thousands of contaminated materials had been excavated and removed on covered lorries. Makes NO SENSE TO DO ALL THIS JUST FOR THE SAKE OF 80 HOUSES.</p>		

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
<p>Representation Reference: 1946124.2</p> <p>Name: Rampton and Woodbeck Parish Council</p>	<p>Refers to: POLICY ST6: Cottam Priority Regeneration Area</p>	<p>Legal compliance and soundness: Legal compliance: not specified.</p> <p>Plan is unsound.</p> <p>Compliance with Duty to Co-operate: not specified.</p>	<p>Comments: There is a lack of evidence relating to: the viability of the site given the contamination; ecology; transport analysis/mitigation.</p> <p>The policy lacks environmental protection; it is unclear which agency protects the Local Wildlife Site.</p> <p>The location is unsuitable for housing. It is unclear how the two pre-planning consultations for solar projects that refer to Cottam will affect future development.</p>	<p>Suggested changes: None</p>	<p>Officer comments: The Land Availability Assessment (LAA) assesses potential development sites: the LAA concludes that LAA473 – Cottam Power Station is potentially suitable for development; subject to the sites ability to deliver the range of services and facilities necessary to create a sustainable settlement. The LAA highlights a range of outstanding suitability and deliverability matters, so proposes the site be identified as a broad location, where growth may be appropriate in the long term subject to evidence (agreed with the LPA) that demonstrates the identified impacts can be appropriately addressed. This will be determined on Local Plan review. Policy ST6 identifies that the site needs remediation, requires protection and enhancement of the Local Wildlife Site and the water quality of the River Trent, and requires a flood</p>

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
					management scheme, collectively to help ensure environmental protection. A Cottam Power Station – Preliminary Report identifies any development on the site is likely to be heavily reliant on car based trips, as a minimum a bespoke bus service would be required to serve the site. The Cottam Solar Power Project is named after its grid connection point at the Cottam Power Station. The associated solar farms are being promoted in West Lindsey, Lincolnshire. If approved construction would commence in 2024; Cottam would need to provide the connection point via underground cabling.
Representation Reference: REF001.3 Name: Canal and River Trust	Refers to: POLICY ST6: Cottam Priority Regeneration Area	Legal compliance and soundness: Plan complies with the Duty to Cooperate. Plan is legally compliant.	Comments: Due to the former use of the site and its proximity to the River Trent and Local Wildlife Sites, it is important that any redevelopment of the site seeks to fully remediate the site and prevent any contamination towards the nearby watercourse. The reference in the policy relating to the protection of the water	Suggested changes: None.	Officer comments: Noted.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
		Plan is sound.	quality of the River Trent should help ensure that the plan is effective in this regard. The Trent is identified by the Trust as a Freight waterway, capable of handling waterborne freight. Welcome the latest policy wording, which states that consideration should be given to opportunities to utilise the River Trent for the transportation of construction and waste materials. This would help to accord with the National Planning Policy Framework and, in the case of larger loads, in the governments water preferred policy for the movement of abnormal loads.		
Representation Reference: REF010.7 Name: Severn Trent	Refers to: POLICY ST6: Cottam Priority Regeneration Area	Legal compliance and soundness: Legal compliance: not specified. Soundness of plan: not specified. Compliance of plan with Duty to Co-operate: not specified.	Comments: The capacity of housing to be delivered on site would be substantially larger than any existing settlements. Existing sewerage infrastructure would not be adequately sized to accommodate the development. Sufficient lead in and confidence in the development will be needed to enable investment to be undertaken to initiate the provision of suitable capacity. Support 3c) relating to the Wetlands; this could be supported through wider green/blue infrastructure including SuDS for the development. Support 3d) relating to the River Trent; this will need to be balanced against the need to provide wastewater services, as reductions to permits could	Suggested changes: None	Officer comments: The site is proposed as a Broad location, not an allocation. More assessment work is required to ensure development can be delivered in a sustainable manner, supported by appropriate timely infrastructure. Partnership work with infrastructure partners including Severn Trent will ensure they are fully appraised of the most up to date position. This work will inform future reviews of the Bassetlaw Local Plan. All

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			result in the delivery of wastewater treatment demand from growth not being viable. Severn Trent are committed to delivering water quality improvements and implement these as part of an agreed scheme of works with the Environment Agency. Support 3e) relating to multifunctional green/blue infrastructure, reducing flood risk and the need for a masterplan covering the drainage of the site; should consider the drainage hierarchy to ensure that the most sustainable outfall are utilised.		proposals should be considered against all relevant Local Plan policies so it is not considered necessary to include a reference to the drainage hierarchy which is addressed by Policy ST53.
Representation Reference: REF030.1 Name: Gerald Eve LLP on behalf of EDF	Refers to: Policy ST6: Cottam Priority Regeneration Area	Legal compliance and soundness: Plan is legally compliant and complies with Duty to Cooperate. Plan is unsound.	Comments: Welcome the retention of the former Cottam Power Station within the Local Plan as a Priority Regeneration Area. Policy has been amended to remove specific land uses due to new evidence relating to flood risk. The lack of detail results in an absence of guidance/certainty, which has potentially significant implications for the marketing and future disposal of the Site. Maintain that the Site could commence during the plan period but recognise more work and consultation with key stakeholders is needed. The emerging policy may now be unsound, with the lack of prescription conflicting with the tests of soundness: • Justified - the evidence submitted by EDF in respect of the Site's	Suggested changes: The following list of land uses is considered to be appropriate for inclusion within Policy ST6. It is proposed to make the policy sound, the following is inserted as a new 'point 3' (the current 'point 3(a-k)' would be renumbered as point 4(a-k)): <i>"3. Appropriate land uses for inclusion within the masterplan framework may include:</i> • Residential uses, <i>including market and</i>	Officer comments: The site is proposed as a broad location not an allocation. Broad locations are not required to define land uses. Further evidence is required from the site promoters to inform an appropriate mix of land uses on this site. The policy approach sets out the criteria that need to be addressed to ensure the potential constraints identified through the Local Plan evidence work can be appropriately mitigated. Policy ST6 refers to the potential of Cottam to accommodate

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>redevelopment is considered to be sufficient for the purposes of indicating appropriate land uses within Policy ST6. The exclusion of any guidance on the appropriate types/mix of uses is not justified. • Effective - without reference to appropriate land uses, Policy ST6 is unlikely to be effective in informing sustainable and deliverable regeneration, which may result in the Site not being regenerated. These can be overcome by amending Policy ST6 to include appropriate land uses; in light of the recent strategic flood risk evidence, the scale of development or quantum of land uses should not be identified until site-specific technical assessment is completed. This would provide greater certainty for a developer in preparing a masterplan for the Site, whilst ensuring flood and other technical matters could be addressed prior to a planning application being submitted.</p>	<p><i>affordable homes, care and other specialist residential uses</i></p> <ul style="list-style-type: none"> • <i>Employment-generating uses, including home-working, offices, light industry, manufacturing and logistics</i> • <i>Local centre, including small-scale retail, local services, food & drink and leisure uses</i> • <i>Primary school</i> • <i>Public open space, sports and recreation facilities</i> • <i>New transport infrastructure, including potential rail link and marina."</i> 	<p>mixed use regeneration; this is considered to provide sufficient flexibility for a masterplan to be prepared to respond positively to the constraints identified by the evidence base and identify an appropriate mix of land uses on the site. Modify paragraph 5.4.19 by adding: As such, and consistent with national planning policy¹, to facilitate a sustainable design and a proposal that positively responds to the site's unique characteristics, Policy ST6 builds in flexibility and does not propose a mix of land uses at this early stage. Instead, it is expected that the planning and technical evidence required to demonstrate compliance with Policy ST6 will inform the masterplan framework for the site and the future mix of uses.</p>
Representation Reference: REF037.1	Refers to: POLICY ST6 Cottam Priority Regeneration Area	Legal compliance and soundness: Plan is legally compliant and complies with the	Comments: The National Planning Policy Framework paragraph 119 confirms that policies should set out a clear strategy for accommodating objectively assessed needs	Suggested changes: None	Officer comments: Noted.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
<p>Name: Pegasus Group on behalf of Harworth Group</p>		<p>Duty to Cooperate.</p> <p>Plan is unsound.</p>	<p>that makes as much use as possible of previously-developed land. Paragraph 120 advises that policies should give substantial weight to using suitable brownfield land for homes and other identified needs, supporting opportunities to remediate land such as Cottam Power Station. Policy ST6 is considered to be consistent with the NPPF. Policy ST6 1) confirms the site will be safeguarded from development which would jeopardise the comprehensive remediation, reclamation and redevelopment of the whole site. 2) requires a scheme to be delivered in accordance with a comprehensive masterplan framework, design code and agreed site infrastructure delivery, and 3) confirms that proposals will be permitted where they form part of the comprehensive redevelopment of the site, setting out a series of requirements (A – K). Policy ST6 is supported, as the thrust of the policy is to secure the comprehensive remediation, reclamation and redevelopment of the whole site.</p>		
<p>Representation Reference: REF037.4</p> <p>Name: Pegasus Group on behalf</p>	<p>Refers to: POLICY ST6 Cottam Priority Regeneration Area</p>	<p>Legal compliance and soundness: Plan is legally compliant and complies with the</p>	<p>Comments: It is important to acknowledge that the Regulation 18 Draft Bassetlaw Local Plan (November 2020) included acceptable main uses for the site, including up to 1,600 dwellings, 14ha employment</p>	<p>Suggested changes: In order to ensure Policy ST6 is sound and has sufficient regard to paragraph 16 of the Framework and the PPG,</p>	<p>Officer comments: The site is a proposed ‘broad location’ not an allocation. Broad locations are not required to define land uses. The change in policy approach</p>

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
of Harworth Group		Duty to Cooperate. Plan is unsound.	development, a public transport hub and renewable energy uses. This was supported by EDF and Harworth Group, and previous submissions suggested that the overall site capacity could be increased to approximately 1,750 dwellings, masterplanning confirms that 1,850 dwellings can be accommodated on site as part of the mix of uses. This clarity on acceptable main uses on the site has been deleted from the latest Policy ST6. It is imperative that Policy ST6 sets out detail of the type and scale of development that is acceptable on site, in order to provide clarity and certainty for potential developers. See Paragraph 16d) of the Framework. This approach is confirmed in the Plan-Making Guidance PPG: "Where sites are proposed for allocation, sufficient detail should be given to provide clarity to developers, local communities and other interested parties about the nature and scale of development." Without this clarity, uncertainty about the type and scale of development proposed by Policy ST6 would undermine developer confidence in bringing forward comprehensive redevelopment proposals for the whole site.	Policy ST6 should include detail to confirm the nature and scale of development proposed. The following are considered acceptable main uses for the site, subject to meeting the requirements above: 1. Housing development of approximately 1,850 dwellings; 2. Employment development (comprising offices, research and development and industry in (comprising B2, B8 E(g)) for up to 14 ha; 3. Public transport hub; 4. Renewable energy uses.	is in response to updated strategic flood risk evidence. Further evidence is required from the site promoters to inform an appropriate mix of land uses on this site. The policy approach sets out the criteria that need to be addressed to ensure the potential constraints identified through the Local Plan evidence work can be appropriately mitigated. Policy ST6 refers to the potential of Cottam to accommodate mixed use regeneration; this is considered to provide sufficient flexibility for a masterplan to be prepared to respond positively to the constraints identified by the evidence base and identify an appropriate mix of land uses on the site. Modify paragraph 5.4.19 by adding: As such, and consistent with national planning policy¹, to facilitate a sustainable design and a proposal that positively responds to the site's unique characteristics, Policy ST6

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
					builds in flexibility and does not propose a mix of land uses at this early stage. Instead, it is expected that the planning and technical evidence required to demonstrate compliance with Policy ST6 will inform the masterplan framework for the site and the future mix of uses.
Representation Reference: REF037.5 Name: Pegasus Group on behalf of Harworth Group	Refers to: POLICY ST6 Cottam Priority Regeneration Area	Legal compliance and soundness: Plan is legally compliant and complies with the Duty to Cooperate. Plan is unsound.	Comments: Subsection 3(e) requires the delivery of a flood management scheme, incorporating Sustainable Drainage System (SuDS), green/blue infrastructure measures, informed by a Flood Risk Assessment (FRA), a hydrology assessment and a Surface Water Management Masterplan and Strategy. Paragraph 4.11 advises that on site flood mitigation and infrastructure is required to support the proposed regeneration. Early engagement has been held with the Environment Agency and detailed modelling, using the Environment Agency Trent model, to an agreed methodology, has been undertaken to review the impact should a breach of the flood defences occur. The results show no impact on the surrounding flood levels during a breach/flood event. This will be submitted for Environment Agency review.	Suggested changes: None	Officer comments: Noted.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Representation Reference: REF043.14 Name: Gladmans	Refers to: POLICY ST6 Cottam Priority Regeneration Area and Bevercotes Colliery	Legal compliance and soundness: Plan is legally compliant and complies with Duty to Cooperate. Plan is unsound.	Comments: Policy ST6 and Cottam are not relied on by the Council to meet the housing or economic requirements and form an aspirational policy to safeguard brownfield land as a potential location for future growth. A similar approach should be taken to support the regeneration of the Bevercotes Colliery site for employment uses to support the demand identified in Icení's A1 Corridor Logistics Assessment (August 2021) and the site should have been considered as part of the study. The site has extant planning permission (09/05/00002) for employment demonstrating the principle of development in this location. Including Bevercotes Colliery as an aspirational Priority Regeneration Area, which does not contribute to meeting specifically defined development needs of the District, while setting conditions which recognise the site's unique circumstances would support the Council's objective of regenerating brownfield sites while safeguarding any potential ecology. The site's location and challenging brownfield characteristics provide opportunities to deliver a pioneering green economy through the Government's 'Build Back Greener'.	Suggested changes: Include Bevercotes Colliery as a Priority Regeneration Area in the Local Plan	Officer comments: The January 2022 Addendum allocates the Bevercotes Colliery site under Policy ST7: Provision of Land for Employment (site reference EM008a) for employment use.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Representation Reference: REF048.9 Name: Nottinghamshire County Council	Refers to: POLICY ST6: Cottam Priority Regeneration Area	Legal compliance and soundness: Not specified	Comments: The supporting text does not set a scale of development and acknowledges that significant work is needed to demonstrate how any additional traffic can be accommodated. Cottam is remotely located and beyond what could be considered an acceptable walking or cycling distance from the majority of everyday services and amenities. The nearest town is Retford, 9 miles to the west by car. Bus services are very limited. Due to the absence of any transport choice, most travel to/from the development is likely to be made by private car. Whilst Part 3f) requires opportunities to reduce transport movements by private vehicles to be minimised, and, opportunities to access the site via bus, cycling and walking to be maximised, the scale and mix of development capable of sustaining a high frequency bus service would be likely to significantly increase peak period traffic flows on rural roads through local villages with negative effects (vehicle emissions, air quality, noise, traffic capacity, road safety and local amenity). It is difficult to see how this could be effectively dealt with without bypassing villages due to land constraints.	Suggested changes: None	Officer comments: The site is identified as a broad location where growth may take place in the long term subject to the provisions of Policy ST6 being satisfactorily addressed. This includes 3f) relating to transport. Paragraph 5.4.18 of the supporting text recognises the access challenges the redevelopment of Cottam has, identified by the Bassetlaw Transport Study (accepted by NCC). Future evidence base work and necessary assessments will inform future Local Plan reviews, which NCC will be fully engaged with.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			There are also likely to be a number of junctions requiring improvement.		
Representation Reference: NRF-REF014.7 Name: East Markham Parish Council	Refers to: POLICY ST6 Cottam Priory Regeneration Area	Legal compliance and soundness: Not specified	Comments: Given the problems associated with contamination and its remote location it is difficult to see either people or businesses willing live or set up here. It will require a disproportionate use of resources.	Suggested changes: None	Officer comments: Noted.

Delivering Economic Prosperity

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name: Representation Reference: 1935123.4 Name: Sheffield City Council	Refers to: 6.1.11 of Section 6.1	Legal compliance and soundness: Legal compliance - not specified. Plan is unsound. Plan does not comply with Duty to Co-operate	Comments: To clarify the employment land position, paragraph 6.1.11 identifies an increased need of 84 hectares, as identified in the Housing and Economic Development Needs Assessment 2020. The identified supply of 169 hectares is twice what is needed, so represents a significant oversupply, which has the potential to undermine the ability of nearby areas such as Sheffield to meet their own identified needs. The plan justifies this over-supply by suggesting a “supply-led” approach. There is no justification in the NPPF or in the national Planning Practice Guidance on Housing and Economic Need to advocate a “supply led approach” that would justify the allocation of land at twice the level of need identified.	Suggested changes: The proposed approach would lead to an over-allocation of employment land that is not supported by the evidence base.	Officer comments: The January 2022 Addendum amends paragraphs 6.1.11-6.1.12 to address these concerns.
Representation Reference: 1935123.5 Name: Sheffield City Council	Refers to: Paragraph 6.1.24	Legal compliance and soundness: Legal compliance - not specified. Plan is unsound. Plan does not comply with Duty to Co-operate	Comments: Paragraph 6.1.24 of the draft Plan is welcomed. However, we have concerns previously referred to above that some of the other elements of the draft plan fail to address this issue.	Suggested changes: The proposed approach would lead to an over-allocation of employment land that is not supported by the evidence base.	Officer comments: The January 2022 Addendum amends paragraph 6.1.24 to address this concern.

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name: Representation Reference: 1935133.1 Name: Sheffield City Council	Refers to: POLICY ST7: Provision of Land for Employment Development	Legal compliance and soundness: Legal compliance - not specified. Plan is unsound. Plan does not comply with Duty to Co-operate.	Comments: This states: Strategic Employment Site 5. Land at SEM001: Apleyhead Junction (118.7ha), as identified on the Policies Map, will be developed to meet the needs for sub-regional and/or regional logistics needs in this plan period, in accordance with Policy ST9.	Suggested changes: Add a reference to “within the logistics property market area defined by the Bassetlaw A1 Logistics Assessment 2021”, as per the wording in paragraph 6 d) and to provide a more accurate definition than “sub-regional and/or regional”. The requirement in 6 h) for the site to provide for 3,857 jobs is unnecessary and is not justified, as there is already sufficient land identified elsewhere to meet the identified employment need. We would suggest that this element is removed.	Officer comments: The January 2022 Addendum amends Policy ST7 6d) and 6h) to address these matters.
Representation Reference: REF014.5 Name: National Trust	Refers to: POLICY ST7: Provision of Land for Employment Development	Legal compliance and soundness: Legal compliance of plan - not specified. Plan is unsound. Compliance with Duty to Co-	Comments: Not justified, effective or consistent with national policy. Object to the 118.7ha Strategic Employment Site. The 2019 Economic Development Needs Assessment showed no need for this site. The 2020 OE forecasts data suggests that only 84ha of land is needed in total. This has been boosted by taking account of the completions	Suggested changes: The assessment of housing and employment needs be reviewed to achieve reduced targets that represent reasonable, sustainable growth for the district. Proposed housing and employment allocations should then	Officer comments: National policy confirms that the standard method is a minimum starting point for assessing housing need. National planning policy states that the housing requirement can exceed that. The approach taken to the provision of housing

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
		operate - not specified	trend, resulting in an aspirational need figure of 186.9ha. This should be an upper end target containing flexibility, which is met by the land supply (excluding Apleyhead) of 184.3ha. The HEDNA states that Apleyhead exhibits the key attributes of a strategic employment site but indicates that in the absence of a Regional Spatial Strategy there is no evidence of need for a strategic site in the region/sub-region. The Bassetlaw A1 Corridor Logistics Assessment fails to address the full logistics needs of the market area as a whole or to involve the affected authorities. Apleyhead is now intended for logistics use only, and Part (d) states that proposals should 'not impact upon the economic growth strategies of other authorities', it is not clear how this could be controlled. It is unclear how excessive housing development would be prevented if Part 6(a-h) cannot be achieved. Promotes unsustainable commuting patterns as the Transport Studies identify pre-existing high levels of car reliance and 'lack of self-containment of the labour market within Bassetlaw' (4.6.2). The 'supply-led' approach to employment land doubles the housing requirement. It is	accordingly be reviewed against the Local Plan evidence base with unnecessary greenfield land allocations being removed from the plan.	and employment land in the Local Plan and Housing and Economic Development Needs Assessment 2020 is considered to be consistent with national Planning Practice Guidance. The January 2022 Addendum amended Policy ST7 to clarify the approach taken towards Apleyhead. The 2022 HEDNA Addendum informs the amended approach taken in the May 2022 Second Addendum to the spatial strategy, housing requirement and the employment land position. The Bassetlaw A1 Corridor Logistics Assessment is considered an appropriate evidence base to inform the allocation of Apleyhead; this has been agreed with the partner authorities in the property market area, as evidenced by a statement of common ground. It is considered the

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			not clear that any of the criteria in PPG where higher housing growth figures should be set have been met. The housing and employment sites proposed to meet these targets are a large release of greenfield land, with impacts for brownfield sites, for the capacity of the highway network and for the local environment.		Sustainability Appraisal, Land Availability Assessment and Site Selection Methodology are consistent with national policy and provide a robust basis by which to determine the most sustainable sites, brownfield and greenfield, to be allocated in the Plan.
Representation Reference: REF038.3 Name: Fisher German on behalf of land owner	Refers to: POLICY ST7: Provision of Land for Employment Development	Legal compliance and soundness: Legal compliance of plan - not specified. Plan is unsound. Compliance with Duty to Co-operate - not specified	Comments: The Local Plan identifies sufficient sites to deliver c290ha of employment land. Policy ST7 sets out the proposed policy for General Employment Sites, which includes land east of North Road (Trinity Farm EM006). As currently proposed, seeks to limit the uses coming forward on General Employment Sites to E(g)/B2/B8 uses and ensure that major applications deliver a site related employment and skills plan to maximise local engagement and training opportunities. Understand the rationale of seeking to control uses on employment sites, this is overly restrictive and in conflict with the flexibility Class-E was introduced to deliver. Should increase flexibility on its employment sites by adopting a wider	Suggested changes: The definition of suitable uses on General Employment Sites be extended to employment generating uses rather than state restrictive uses. This could be caveated with requirements for uses to deliver an appropriate employment density, eg no uses with an employment density lower than B8 uses, to ensure no loss in job provision. Or, the level of employment generating uses outside of E(g)/B2/B8 could be restricted to be no more than 50% of the site for example. Such	Officer comments: Policy ST7 allocates land for employment use which are capable of increasing economic productivity; increase the number and quality of jobs, particularly higher skilled jobs, access to training and increase wage levels for residents. To do so, Policy ST7 seeks to protect the employment allocations from non employment uses outside Class E(g), B2 and B8 which could impact their viability as employment locations. It is considered Policy ST7 provides sufficient flexibility for business

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>definition of suitable uses which could be brought forward e.g. proposals could be required to be employment generating, or additional uses within Class E could be included. Many Class-E uses are likely to have a significantly higher employee numbers than traditional B uses, particularly B8 uses. In terms of job provision, other uses could be more economically beneficial and shouldn't be excluded. The Employment Density Guide 3rd edition (November 2015) sets out that B8 uses tend to range between an employment density of 70-95sqm per full time employee. Retail uses, the employment density can be as low as 15-20sqm per full time employee. Retail is likely to provide significantly more jobs than B8 uses. It is unproductive and inefficient to have land which could be brought forward for economically beneficial purposes vacant awaiting uses which may not be suitable or unviable. The current policy only enables alternative uses if they are ancillary to the Strategic Employment Site where they can demonstrate that they support, maintain or enhance the primary business and employment function of the site and where they would not</p>	<p>proposals would need to demonstrate that they do not have undue impacts on the town centre. Or could open up the Policy to enable the development of B and all E Class uses with criterion to ensure such a policy would not have adverse impacts on the town centre. This would enable the delivery of suitable uses such as showroom retail, gyms, nurseries, medical etc. The policy should apply flexibility and caveats as to when other uses would be acceptable. It is unclear whether the provisions of ST10 are applicable to General Employment Sites.</p>	<p>operation, by recognising that ancillary uses can be appropriate where they support employment development of the general/strategic employment sites. As the wider use class E includes retail and other main town centre uses, reference may have the unintended consequence of undermining a Local Plan objective to protect the function of the town centres. The justification for the employment site allocations is that they are deliverable for the identified uses. On that basis the provisions of Policy ST10 should not apply to the employment site allocations. It is considered that a proposed suggested change to Policy ST10 will clarify this matter: 3. The change of use or redevelopment of all or part of an Existing Employment Site or other</p>

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			result in an over-concentration that might affect the function and appearance of the area. There are a number of uses which would be a logical use. It is vital that there is flexibility to ensure economic growth can be brought forward commensurate with modern requirements and in the way most suiting for each individual site, reflective of demand, location, access to public transport, availability of services, etc.		employment land or buildings (outside the General and Larger Unit Employment Sites and the Strategic Employment Site identified by Policy ST7) to a non-E (g), B2 or B8 use will only be permitted where it can be evidenced that:
Representation Reference: REF041.1 Name: DHL Real Estate Solutions on behalf of land owner	Refers to: POLICY ST7: Provision of Land for Employment Development	Legal compliance and soundness: Plan is not legally compliant or sound. Plan complies with the Duty to Cooperate.	Comments: Supportive but Policy ST7 and the evidence base is not sound. Bevercotes Colliery should be listed under Policy ST7 with the land available before 2037. DHL, and the landowner Gladman consider it has a reasonable prospect of being delivered, and should be included in the evidence base (Bassetlaw A1 Logistics Assessment, August 2021) and the Plan. The inclusion of Bevercotes Colliery still results in an undersupply in all scenarios, and would not represent a material change to the outcome.	Suggested changes: Update the evidence base to reflect the reasonable prospect of Bevercotes Colliery being delivered for 2.7m sqft of employment floorspace across 80 hectares. Recommend an addendum to the Bassetlaw A1 Logistics Assessment, August 2021 to ensure Bevercotes Colliery is included.	Officer comments: The January 2022 Addendum allocates the former Bevercotes Colliery as an employment site (EM008a) under Policy ST7. The Bassetlaw A1 Logistics Assessment Addendum, April 2022 and the HEDNA Addendum 2022 have been updated to robustly evidence the approach to Policy ST7 and Bevercotes Colliery.
Representation Reference: REF043.15	Refers to: Paragraph 6.1.7	Legal compliance and soundness: Plan is legally compliant and complies with	Comments: Section 6.1 highlights the potential to capitalise on the districts strategic accessibility along the A1 and A57 corridors, notably within the logistics	Suggested changes: None	Officer comments: The January 2022 Addendum allocates the former Bevercotes Colliery as an employment site

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name: Gladmans		Duty to Cooperate. Plan is unsound.	sector. Paragraph 6.1.7 notes that to resist over-reliance on the manufacturing and logistics sectors allocations, Bassetlaw Garden Village and Marnham Energy Hub are identified to meet other growth sector needs. This does not align with the evidenced demand for B8 and B2 uses in the A1 Corridor Logistics Assessment. Further B8 employment sites should be allocated to ensure that there is a 15 year supply. The A1 Corridor Logistics Assessment consider that there is likely to be insufficient supply of such employment sites when planning for 15 years or more, and that there is likely to be a need for more logistic sites in the southern part of the PMA by 2037.		(EM008a) under Policy ST7. The Bassetlaw A1 Logistics Assessment Addendum, April 2022 and the HEDNA Addendum 2022 have been updated to robustly evidence the approach to Policy ST7 and Bevercotes Colliery. The January 2022 Addendum no longer allocates High Marnham site for employment use in Policy ST7. The May 2022 Second Addendum withdraws the Bassetlaw Garden Village from the Local Plan.
Representation Reference: NRF-REF013.1 Name: DHA Planning on behalf of landowner	POLICY ST7: Provision of Land for Employment Development	Legal compliance and soundness of plan - not specified. Compliance with Duty to Co-operate - not specified	Comments: Strongly support the allocation of the EM003 for general employment development under Policy ST7(4).	Suggested changes: Request that the site name is updated to reflect its new title: the Centre of Excellence for Modern Construction.	Officer comments: The January 2022 Addendum amends the site name for EM003 at Policy ST7 4. to Centre of Excellence for Modern Construction.

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name: Representation Reference: NRF-REF017.2 Name: Doncaster Metropolitan Borough Council	Refers to: POLICY ST7: Provision of Land for Employment Development	Legal compliance and soundness: Legal compliance and soundness of plan - not specified. Compliance with Duty to Co-operate - not specified	Comments: There has been discussions and correspondence regarding Apleyhead over the last year or so, and the lack of an evidence base, however Doncaster Council recognises that this has now been addressed through the A1 Corridor Logistics Assessment and through meetings with the South Yorkshire MCA and South Yorkshire colleagues. Support paragraph 6.1.24 relating to ongoing Duty to Cooperate and Statements of Common Ground with partner authorities. Policy ST7 e) would benefit from additional words requested as Doncaster Council's letter 20th January 2021. This will help ensure that the site acts as a Strategic Employment Site and not part of the general supply. The proposed amendments seek to prioritise sites in South Yorkshire MCA and that the "policy does require schemes to bring gross value added to the District but D2N2 and Sheffield City Region will be added". Criterion e) would benefit also.	Suggested changes: Criterion e) of Policy ST7 would benefit from additional words: "not compromise the viability or deliverability of other employment allocations identified by this Plan or in Local Plans adopted by other authorities within D2N2 or the South Yorkshire Mayoral Combined Authority"	Officer comments: The January 2022 Addendum amended Policy ST7 5e to address the matter identified.
Representation Reference: NRF-REF019.4 Name:	Refers to: POLICY ST7: Provision of Land for	Legal compliance and soundness: Legal compliance and soundness of	Comments: A Duty to Co-operate meeting (8 February 2021) and co-operation between Bassetlaw District Council and Rotherham MBC is ongoing. A	Suggested changes: Suggestion for mitigation to address traffic impact on the A57 but no specific detail has been provided.	Officer comments: The January 2022 Addendum amended paragraph 4.4 to clarify the use of the site for logistics

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Rotherham Metropolitan Borough Council	Employment Development	<p>plan - not specified.</p> <p>Compliance with Duty to Co-operate - not specified</p>	<p>Statement of Common Ground is being prepared between Rotherham MBC and Bassetlaw DC. Previously expressed concerns with the South Yorkshire authorities about the strategic employment site at Apleyhead Junction, which may pose a risk to the economic aims of Sheffield City Region and the wider D2N2 region. The planned logistics study shows that there is a need for more land to be made available for logistics. Welcome the tightening of the policy and the greater emphasis on logistics. The policy should ensure that this is to be used for logistics only to ensure there is not an over-supply of general employment land. Paragraphs 4.4 and 5.1.15 imply suitability for general employment use, which is not appropriate. An over-supply of employment land in Bassetlaw risks a negative impact on the economic growth of Rotherham and South Yorkshire authorities and in D2N2, by focusing inward investment towards Bassetlaw at the expense of other authorities. The required jobs figure of 3,857 is inappropriate given that the purpose is to meet regional logistics needs and the Plan allocates an over-supply of employment land. Part of the</p>	<p>Paragraphs 4.4 and 5.1.15 of the plan imply that the land at Apleyhead will be suitable for general employment use, which is not considered appropriate, as the site is proposed to meet regional logistics need.</p>	<p>only (and not general employment use); and deleted reference at paragraph 5.1.15 to the jobs figure. The Bassetlaw Transport Study 2022 identifies no impacts on the road network outside the district from Local Plan growth. Despite this an A57 Improvement Plan Project Group has been established, in partnership with Rotherham MBC, to progress the A57 Improvement Plan between the A1/A57 in Bassetlaw and the M1/A57 in Rotherham to ensure that the A57 both districts Local Plan growth can be accommodated, and so that appropriate mitigation can be identified and funded. Bridge Court (formerly the WASH) is likely to employ 30 employees so is considered to meet the needs of existing residents.</p>

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>traffic generated will head to the M1 northbound through South Rotherham; this is congested and additional traffic would require mitigation to be put in place and has not been considered. Logistics would generate more two-way daily traffic and use of sustainable transport is likely to be inadequate. Note Policy ST54 proposes improvements to the A57. Development at the WASH should provide jobs to meet the needs of existing residents.</p>		
<p>Representation Reference: NRF-REF021.3</p> <p>Name: Derbyshire County Council</p>	<p>Refers to: Paragraph 6.1.23</p>	<p>Legal compliance and soundness: Legal compliance and soundness of plan - not specified.</p> <p>Compliance with Duty to Co-operate - not specified</p>	<p>Comments: In discussions with the Council through the HMA Officer Liaison Group, Derbyshire County Council's Officers have indicated that due to the location of the Apleyhead Junction, it is unlikely to have any adverse impacts on the economic growth strategies or property markets in the northern part of Derbyshire, particularly logistics developments in the M1 corridor, especially at Markham Vale, which has largely been developed and where demand for employment floorspace is strong. Would welcome the opportunity to be consulted on any Transport Assessments submitted with applications, to assess any potential</p>	<p>Suggested changes: Request to be consulted on planning applications relating to Apleyhead.</p>	<p>Officer comments: Noted and agreed.</p>

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			implications upon the Derbyshire road network.		
Representation Reference: NRF-REF022.1 Name: D2N2 LEP	Refers to: POLICY ST7: Provision of Land for Employment Development	Legal compliance and soundness of plan - not specified. Compliance with Duty to Co-operate - not specified	Comments: Support the Local Plan's economic growth strategy, as it aligns with D2N2s Recovery and Growth Strategy by increasing productivity of the regional economy, reduces out-commuting by increasing the number and quality of better paid, higher skilled jobs in the district and region. The plan is particularly supportive of the approach taken to securing employment diversification through employment and skills plans. The LEP supports the approach taken to capitalise on the Districts locational advantage along the A1/A57, and the regeneration of former power station sites as this will help diversify the local and regional economy as this will support the LEPs ambitions of the UK's largest carbon turnaround of carbon.	Suggested changes: None	Officer comments: Noted

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Representation Reference: REF014.6 Name: National Trust	Refers to: POLICY ST8: EM008: High Marnham Green Energy Hub	Legal compliance and soundness: Legal compliance of plan - not specified. Plan is unsound. Compliance with Duty to Co-operate - not specified	Comments: Support in principle redeveloping the former High Marnham Power Station to create a green energy hub, with its existing grid connections and contaminated status, subject to an appropriate scale to keep impacts on the neighbouring hamlet, road network, landscape, heritage and the River Trent within acceptable limits. An LDO may be a useful mechanism for granting consent for a site, it does not prevent a developer from coming forward with their own proposal via a planning application at any time (before or after adoption of an LDO). Note that Part 5 of the policy states that proposals that are contrary to the LDO will not be supported; recommend that legal advice is sought on whether it is appropriate to use and LDO in this way.	Suggested changes: <ul style="list-style-type: none"> • Amend to include provisions to site specific constraints/opportunities such as heritage, wildlife and flood management. • Set out in policy its position in relation to key constraints/opportunities of the site and its surroundings, such as wildlife and flood management to overcome the limitations of an LDO. • Seek legal advice on whether it is appropriate to use an LDO to restrict proposals that are contrary to the LDO, may inhibit alternative proposals that are sustainable and policy compliant. 	Officer comments: The January 2022 Addendum Policy ST7 no longer allocates High Marnham for employment use so also deletes the site allocation policy, ST8 from the Plan. On that basis, the Local Development Order would not be progressed.
Representation Reference: REF032.2 Name: Town Planning.co.uk	Refers to: POLICY ST8: EM008 High Marnham Green Energy Hub Point 4	Legal compliance and soundness: Plan is legally compliant and complies with the	Comments: High Marnham is poorly accessible. NPPF Paragraph 85 states that sites in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by	Suggested changes: Delete the proposed site EM008: High Marnham Energy Hub for employment. If wanted it could be retained for the	Officer comments: The January 2022 Addendum Policy ST7 no longer allocates High Marnham for employment use so also deletes the site allocation

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
		<p>Duty to Cooperate.</p> <p>Plan is unsound.</p>	<p>public transport. But development should not have an unacceptable impact on local roads and improve the scope for access on foot, by cycling or by public transport. Previously developed land and sites that are physically well-related to existing settlements should be encouraged where suitable opportunities exist. Marnham no longer has a rail connection, is accessed by 'C' roads that go through villages. All have a poor accident record involving HGVs. Cannot be reached by public transport, the nearest bus stop is 1.7km away and is not within walking and cycling distance of local settlements. Includes no improvements to the A57, or to improve the accessibility of the site by sustainable modes of transport. Would be dependent upon the vehicles which will have an unacceptable impact on local roads, which are unsuited to HGVs. The Bassetlaw Economic Needs Assessment discounts sites at Markham Moor which are closer to Tuxford and Retford for being "some distance from nearby labour supply." Could be used as a renewable energy generation hub without the need to locate businesses and operate for rail related purposes with a short connection to the existing Rail Test Track. Large scale sites in remote locations eg the former</p>	<p>siting and production of renewable energy, such as a solar farm without any employment provision.</p>	<p>policy, ST8 from the Plan. The January 2022 Addendum promotes the Former High Marnham Power Station site as an Area of Best Fit for clean energy and renewable energy generation development by Policy ST51. The Former Bevercotes Colliery is identified by the January 2022 Addendum Policy ST7 as an employment site (EM008a).</p>

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name:			Bevercotes Colliery remain vacant despite having planning permission and not assessed in the Bassetlaw Economic Needs Assessment.		
Representation Reference: REF043.17 Name: Gladmans	Refers to: POLICY ST8: EM008 High Marnham Green Energy Hub	Legal compliance and soundness: Plan is legally compliant and complies with Duty to Cooperate. Plan is unsound.	Comments: Support High Marnham as a green energy hub and welcome the ambition in delivering green and low carbon employment on a brownfield regeneration site. High Marnham is in a rural location; flexibility is required in the delivery of B8 and logistics sites. Consideration should be given to the former Bevercotes Colliery.	Suggested changes: Include Bevercotes Colliery in the Local Plan as a Priority Regeneration Area	Officer comments: The January 2022 Addendum Policy ST7 no longer allocates High Marnham for employment use so also deletes the site allocation policy, ST8 from the Plan. The January 2022 Addendum promotes the Former High Marnham Power Station site as an Area of Best Fit for clean energy and renewable energy generation development by Policy ST51. The Former Bevercotes Colliery is identified by the January 2022 Addendum Policy ST7 as an employment site (EM008a).
Representation Reference: REF046.2 Name: J G Pears	Refers to: POLICY ST8: EM008 High Marnham Green Energy Hub	Legal compliance and soundness: Plan is legally compliant and complies with Duty to Cooperate.	Comments: Support the principle but OBJECT to components of ST8. In active discussion with interested parties to undertake significant investment with the deployment of green energy. Attached written support (October 2021) from	Suggested changes: Criterion 1: omit	Officer comments: The January 2022 Addendum Policy ST7 no longer allocates High Marnham for employment use so also deletes the site allocation policy, ST8 from the Plan.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
		Plan is unsound.	D2N2 and Midlands Energy Hub. Point 1 states the site 'will be developed in a comprehensive and sensitive manner to support low carbon growth, reduce carbon emissions and leave a positive low carbon economic and environmental legacy for Bassetlaw'. Will not in the ordinary meaning leave a 'legacy', it will be dynamic, evolving in response to different technologies and changing market signals. Most companies through their CSR responsibilities and to shift away from fossil fuels recognise the need for and will invest in low carbon technologies. High Marnham will be the co-joining opportunity for a substantial solar farm – the energy generated may be all/in part consumed by occupiers. May accommodate a wide range of specific uses related to the energy sector. Further supported by JG Pears own direct grid connection from their nearby CHP plant at Low Marnham, which inputs surplus energy into the Grid, but could potentially be harnessed directly by future occupiers.		The January 2022 Addendum promotes the Former High Marnham Power Station site as an Area of Best Fit for clean energy and renewable energy generation development by Policy ST51. However, to provide a comprehensive, flexible framework within which proposals at Marnham can be considered, it is considered that a proposed suggested change to Policy ST51 which removes the Area of Best Fit would address the matter.
Representation Reference: REF046.2 Name: J G Pears	Refers to: POLICY ST8: EM008 High Marnham Green Energy Hub	Legal compliance and soundness: Plan is legally compliant and complies with	Comments: Criterion 2: not justified in its reference to 'employment functions connected with renewable energy and low carbon energy sectors'. 6.2.1 states: 'provides an	Suggested changes: Criterion 2. should read: ' <i>Proposals within Class E(g)/B2]/B8 and sui-generis uses providing employment</i>	Officer comments: The January 2022 Addendum Policy ST7 no longer allocates High Marnham for employment use so also

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
		<p>Duty to Cooperate.</p> <p>Plan is unsound.</p>	<p><i>opportunity to positively re-use a longstanding, substantial brownfield site and facilities its redevelopment. Its closure directly affected employment in the rural area and indirectly affected local supply chains</i>. Class Eg/B2/B8 and 'sui-generis', can through high quality design, respond to climate change in reducing energy demand, being energy efficient and provide renewable energy. Policy ST8 should positively encourage new economic investment which will support low carbon growth, but may not be directly involved in energy generation, or connected to renewable energy and low carbon technologies on site. No justification to limit growth to 38.4 hectares in the Plan period and 21.6 hectares after. Criterion 5: An LDO is to incentivise development but the content of the LDO is unknown. Works will be completed on the draft LDO by Autumn 2022 to inform implementation following adoption of the Local Plan. The preparation of a development plan can never be omniscient in anticipating each and every circumstance where development may be permitted.</p>	<p><i>and infrastructure uses which may be suitably located at High Marnham will be required to demonstrate high quality design standards including response to energy hierarchy</i>'. Reference to the amount of land to be developed in this plan period and the next period should be omitted.</p> <p>Criterion 5: Criterion 5 is not justified by the evidence base and is inconsistent with national planning policy. Other uses not provided with permitted development rights within an LDO may constitute appropriate land uses for High Marnham. Policy ST8 should not establish a presumption against such uses being permitted, merely because such uses are not defined in an LDO.</p>	<p>deletes the site allocation policy, ST8 from the Plan. The January 2022 Addendum promotes the Former High Marnham Power Station site as an Area of Best Fit for clean energy and renewable energy generation development by Policy ST51. However, to provide a comprehensive, flexible framework within which proposals at Marnham can be considered, it is considered that a proposed suggested change to Policy ST51 which removes the Area of Best Fit would address the matter.</p>

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Representation Reference: REF048.10 Name: Nottinghamshire County Council	Refers to: POLICY ST8: EM008: High Marnham Green Energy Hub	Legal compliance and soundness: Legal compliance and soundness of plan - not specified. Compliance with Duty to Co-operate - not specified	Comments: No mention of transport requirements including provision for walking cycling, and public transport.	Suggested changes: None	Officer comments: The January 2022 Addendum Policy ST7 no longer allocates High Marnham for employment use so also deletes the site allocation policy, ST8 from the Plan.
Representation Reference: NRF-REF014.8 Name: East Markham Parish Council	Refers to: POLICY ST8: EM008: High Marnham Green Energy Hub	Legal compliance and soundness: Legal compliance and soundness of plan - not specified. Compliance with Duty to Co-operate - not specified	Comments: The policy to use the former power station site at High Marnham has some merit. There are no plans to improve transport links to this remote location, or plans for housing to accommodate workers in the vicinity. Would need to be a worked out plan to enable staff and visitors to access the site. Personnel using a green energy site should not use CO2 generating transport.	Suggested changes: Requirement for sustainable transport methods for future employees	Officer comments: The January 2022 Addendum Policy ST7 no longer allocates High Marnham for employment use so also deletes the site allocation policy, ST8 from the Plan.
Representation Reference: NRF-REF018.1 Name: National Grid	Refers to: POLICY ST8: EM008: High Marnham Green Energy Hub	Legal compliance and soundness: Legal compliance and soundness of plan - not specified. Compliance with Duty to Co-	Comments: High Marnham is crossed by National Grid assets. XE ROUTE: 275Kv Overhead Transmission Line. Route: High Marnham – Thurcroft – West Melton 4ZV ROUTE: 275Kv Overhead Transmission Line Route: CHESTERFIELD - HIGH MARNHAM 1 ZDF ROUTE TWR (002 - 057): 400Kv Overhead Transmission Line. Route:	Suggested changes: Policy ST8: propose amendments to the site allocation and policy to include the following: <i>“A strategy for responding to the National Grid assets present within the site which demonstrates how</i>	Officer comments: Noted.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
		operate - not specified	COTTAM - STAYTHORPE 1 ZDA ROUTE TWR (254 - 311) : 400Kv Overhead Transmission Line. Route: COTTAM – GRENDON ZDA ROUTE TWR (248B - 248F) : 400Kv Overhead Transmission Line. Route: DISC HIGH MARNHAM ROUTE ZDA ROUTE TWR (247-248A-251A-252B-252A) : 400Kv Overhead Transmission Line. Route: HIGH MARNHAM - WEST BURTON ZDA ROUTE TWR (252C - 253A) : 400Kv Overhead Transmission Line. Route: HIGH MARNHAM 400/275KV SGT2 Electrical Substation : HIGH MARNHAM 400KV Electrical Substation : HIGH MARNHAM 275KV	<i>the National Grid Design Guide and Principles have been applied at the masterplanning stage and how the impact of the assets has been reduced through good design.”</i>	
Representation Reference: NRF-REF022.3 Name: D2N2	Refers to: POLICY ST8: EM008: High Marnham Green Energy Hub	Legal compliance and soundness of plan - not specified. Compliance with Duty to Co-operate - not specified	Comments: D2N2 recognises multiple potentially significant developments in the area such as the former Marnham power station for delivering growth in the green energy sector can play in helping to diversify the economy and delivering the expansion of key regional economic growth sectors.	Suggested changes: None	Officer comments: The January 2022 Addendum Policy ST7 no longer allocates High Marnham for employment use so also deletes the site allocation policy, ST8 from the Plan. The January 2022 Addendum promotes the Former High Marnham Power Station site as an Area of Best Fit for clean energy and renewable energy generation development by Policy ST51.

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Representation Reference: REF010.8 Name: Severn Trent	Refers to: Paragraph 6.3.6	Legal compliance and soundness: Legal compliance of plan - not specified. Soundness of plan - not specified. Compliance of plan with Duty to Co-operate - not specified.	Comments: Support the implementation of BREEAM for employment allocations, such that they incorporate sustainable construction methods and implement water efficiency and water re-use.	Suggested changes: None	Officer comments: Noted
Representation Reference: REF014.7 Name: National Trust	Refers to: POLICY 9: Site SEM001: Apleyhead Junction, Worksop	Legal compliance and soundness: Legal compliance of plan - not specified. Plan is unsound. Compliance with Duty to Co-operate - not specified	Comments: Do not support the allocation of a Strategic Employment Site at Apleyhead. Should Apleyhead be allocated a robust policy framework is required to control development. Significant concerns about the scope and scale of transport upgrades along the A57 corridor, their deliverability, efficacy and environmental impacts. The Transport Study Update 2021 indicates that Apleyhead will contribute significantly to stress on this highway link, the A57 would need to be widened to dual carriageway for approximately 6km and junction improvements made. This would involve potential significant loss of trees in Sherwood Forest. No costs provided for the dualling,	Suggested changes: <ul style="list-style-type: none"> • Remove the Apleyhead Strategic Employment Site from the plan to avoid significant highway and junction capacity issues and associated environmental impacts. • Should this be retained amend Part (b) to ‘... a project level Habitats Regulations Assessment, including winter bird surveys to establish the contribution that the site makes to foraging habitat, and that if 	Officer comments: Existing issues on the A57 are exacerbated by freight traffic using the road as a link between the A1 and M1. National legislation/guidance states it is not appropriate for new development to address existing issues. Due to the A57’s importance to the local and regional economy, the Bassetlaw Transport Study 2022, accepted by the Local Highways Authority, identifies that parts of the A57 are currently near or at

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>although the Junction Assessment Report 2020 suggested in the region of £15-20 million, which ‘would be prohibitively expensive’. The Update Report 2021 notes that costs are likely to be beyond the affordability of developer contributions and have no identified funding mechanism. Land south of the A57 is part of Clumber Park Grade I Registered Historic Park and Gardens and is National Trust ‘inalienable’ land so it cannot sell, give away or mortgage that land. Nor can that land be compulsorily acquired from the Trust against its will without a special procedure involving the Houses of Parliament. Land to the north is a Local Wildlife Site. The Junction Assessment Report 2020 without the Apleyhead employment site (with different Garden Village Proposals), found that dualling of the A57 would not be required and that the performance of junction mitigation schemes would be improved.</p>	<p>significant populations are found appropriate mitigation is provided in the form of areas of optimal foraging habitat (e.g. seed-rich set aside land) either within the site or in the wider landscape’.</p> <ul style="list-style-type: none"> • Amend Part (d) to ‘a scheme of an appropriate scale, height, layout, form and materials which respects the significance and setting of affected heritage assets and is supported by a heritage statement including an assessment of impact and mitigation measures...’. • similar sensitivity testing as found in the Junction Assessment Report 2020 for the current Local Plan would be beneficial. 	<p>capacity, including at peak times but that a credible mechanism should be put in place through an Improvement Plan to consider the scope, options and outcomes for the A57. However, the Bassetlaw Transport Study 2022 has assessed the potential impact of Local Plan growth upon highway capacity and has identified proportionate necessary mitigation for relevant development. The Council is currently working with relevant partners to look at the feasibility of a wider improvement plan for the A57. The approach taken to 2b and 2d has been agreed with statutory consultees so is considered appropriate. The May 2022 Second Addendum withdraws the Bassetlaw Garden Village from the Local Plan.</p>

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name: Representation Reference: NRF-REF022.2 Name: D2N2	Refers to: POLICY 9: Site SEM001: Apleyhead Junction, Worksop	Legal compliance and soundness: Legal compliance of plan - not specified. Soundness of plan – not specified. Compliance with Duty to Co-operate - not specified	Comments: Following the Covid 19 pandemic there is greater interest in logistics at a national and regional level, Bassetlaw and Apleyhead is well placed on the A1/A57 corridors to capitalise on this and offer the potential to secure substantial inward investment for large scale logistics or potentially a gigafactory offer of up to 4.75msqft in the region, as well as bringing clear associated benefits to the local and regional supply chains and the district, sub region/regional economy, in terms of GVA. The scale at Apleyhead has the potential to attract the widest range of logistics occupiers, particularly those within the digital logistics sector, requiring a highly skilled specialist workforce that would bring significant additional permanent higher skilled jobs.	Suggested changes: None	Officer comments: Noted
Representation Reference: REF048.3 Name: Nottinghamshire County Council	Refers to: POLICY 9: Site SEM001: Apleyhead Junction, Worksop	Legal compliance and soundness: Legal compliance of plan - not specified. Plan is unsound. Compliance with Duty to Co-operate - not specified	Comments: Support the principle of Apleyhead Junction on economic grounds. There is no Worksop Transport Assessment; the road network within and around Worksop has not had the same scrutiny as Retford. Peaks Hill Farm and Apleyhead are likely to have material traffic impact on local junctions and mitigation has yet to be established. Unable to support Apleyhead until this is addressed with the impact of the Garden Village. The Bassetlaw Transport Study identifies that the A57 between the B6034 and A614/A1 would	Suggested changes: Policy 9 should be amended as follows: Under Transport and Connectivity Part a)ii. include improvements to link capacity on the A57 as identified in the Bassetlaw Transport Study. No development of Apleyhead should occur in light of paragraph 11.5.8	Officer comments: Officer comments: The Bassetlaw Transport Study 2022, accepted by the Local Highways Authority, has assessed the potential individual and cumulative impact of Local Plan growth upon the Worksop network and the A57 and has identified proportionate necessary mitigation from relevant development,

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>operate with significant stress with Local Plan growth including the link connecting to the Garden Village and Apleyhead. Require an 'Improvement Plan' for the A57 corridor be agreed with partners to address growth with a credible mechanism for delivery as the cost is likely to be more than developer contributions. Unable to support Apleyhead without a restriction on development until the improvement mechanism has been secured. Both are zero CIL rated, so no funding from this source. A57 Corridor is in emerging NCC Strategic Infrastructure Plan but has no committed funding. Offer to work with the Council to develop an Improvement Plan and developer funding mechanism under which appropriate larger sites including Apleyhead can make a proportionate and justified contribution towards improvements. These would be pooled, potentially through S106 or other mechanisms. Should jointly seek to secure other funding during the Plan period to enable the delivery of these improvements.</p>	<p>and 11.6.14 of the BTS until a credible mechanism for the improvement of the A57 has been secured. This should be referenced in the Policy.</p>	<p>including that considered necessary to support the development of Apleyhead over the plan period. Due to the A57's importance to the local and regional economy (between the A1 and M1 and including wider traffic movements not in control of the Local Plan), the Bassetlaw Transport Study recommends that a wider Improvement Plan is developed in partnership with neighbouring authorities, NCC and National Highways. The BTS identifies that there is 8 years worth of capacity available in the A57. As a result NCC have accepted that the Improvement Plan is not required to inform the Local Plan, but should be in place to inform Local Plan review, as evidenced by the statement of common ground. The Council is working with relevant partners to take forward feasibility work to underpin</p>

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
					<p>the A57 improvement plan and to consider how a 'credible mechanism' could work in the long term. Funding is expected to come from several sources including S106 contributions, CIL and other funding streams. It is considered that a proposed suggested change to Policy 9 h) will address this matter: all necessary transport infrastructure improvements through direct mitigation or contributions to new and improved infrastructure, which shall include, but not be limited to, the following schemes identified within the Infrastructure Delivery Plan, exact details to be identified as part of referring to the development's Transport Assessment and Travel Plan and any future planning applications for the site, informed by Local Highways Authority advice detailing:</p>

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
					<p>i. safe access to the site from the A57 for vehicles, public transport, cyclists and pedestrians;</p> <p>ii iii. an appropriate financial contribution towards extending a high frequency bus service between the site and Worksop town centre supported by appropriate public transport infrastructure within at the site;</p> <p>iiiiv. quality, safe and direct pedestrian and cycle links along the A57 to connect with existing development;</p> <p>vi. ii. An appropriate, proportionate financial contribution towards improving the capacity, relevant link capacity of the A57 and following junctions along the A57 at:</p> <p>a)the A60 Mansfield Road/A619</p> <p>b)the A57/Sandy Lane</p> <p>c)the A57/Claylands Ave/Shireoaks Common</p> <p>d)the A57/B6034/Netherton Road</p>

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
					<p>e)the A57/B6040 roundabout; f) the A614 Blyth Road/A57/A1 roundabout; vii.-v. appropriate servicing and parking provision for each development parcel iii. an appropriate financial contribution towards extending a high frequency bus service between the site and Worksop town centre supported by appropriate public transport infrastructure within the site; iv. quality, safe and direct pedestrian and cycle links along the A57 to connect with existing development; v. appropriate servicing and parking provision for each development parcel. The May 2022 Second Addendum withdrew the Garden Village from the Local Plan.</p>

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Summary of Comments:	Suggested changes by consultee:	Officer Comments
<p>Representation Reference: REF013.1</p> <p>Name: Rapleys on behalf of Dooba Developments Limited (c/o Commercial Estates Group),</p>	<p>Refers to: Policy ST10: Existing Employment Sites</p>	<p>Legal compliance and soundness: Plan is legally compliant and sound - not specified</p> <p>Plan complies with the Duty to Cooperate – not specified</p>	<p>Comments: Not supported. In its current wording, the policy makes the outdated assumption that only uses falling within the former Class B (B1/B2/B8) are employment generating and are thus ‘employment’ uses, which is plainly not the case in an economy that is so heavily reliant on the commercial, business and service sectors. Contrary to what is suggested at paragraph 6.4.5, the policy could potentially hinder the long-term viability of Existing Employment Sites if such a rigid approach is applied in terms of the Use Classes permitted (together with the use of conditions to restrict the proliferation of other E class uses), meaning flexibility is not afforded against unprecedented economic events that dictate market conditions.</p>	<p>Suggested changes: Inclusion of Class E offers, especially by embedding its principles in planning policy, it is possible to add to the vitality of an existing business or property asset, thus improving its overall viability in the long term.</p> <p>The policy should be reworded so that the extent of permitted uses falling with Class E is expanded, save for where there are obvious and reasonable concerns surrounding principle and the harm to the District’s town centres.</p> <p>This builds in flexibility for Existing Employment Sites against fluctuating and challenging market conditions over the 15-year plan period to 2037. This approach would accord with paragraph 20 of the NPPF (which requires strategic policies to make sufficient provision for</p>	<p>Officer Comments: Policy ST10 makes provision for Class E(g), B2 and B8 uses. To enable flexibility for businesses, Policy ST10 recognises that ancillary uses can be appropriate where they support employment development at the existing employment sites. As the wider use class E includes retail and other main town centre uses, reference may have the unintended consequence of undermining a Local Plan objective to protect the function of the town centres.</p>

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Summary of Comments:	Suggested changes by consultee:	Officer Comments
				employment development), as well as the Government's intentions in amending the Use Class Order, to introduce the new Class E.	
Representation Reference: NRF-REF013.2 Name: DHA Planning on behalf of landowner	Refers to: Policy ST10: Existing Employment Sites	Legal compliance and soundness: Plan is legally compliant and sound - not specified Plan complies with the Duty to Cooperate – not specified	Comments: Support the changes to this policy, which address the concerns set out in our Regulation 18 response. Specifically, we welcome the addition of the words “and/or” at the end of each requirement, which provides greater clarity.	Suggested changes: None	Officer comments: Noted
Representation Reference: NRF-REF014.9 Name: East Markham Parish Council	Refers to: Policy ST10: Existing Employment Sites	Legal compliance and soundness: Plan is legally compliant and sound - not specified Plan complies with the Duty to Cooperate – not specified	Comments: The former Bevercotes Colliery Site or the land at Gamston Airport in the document. The Bevercotes site already has an expired planning permission for warehousing. It has potential to provide accommodation for high tech manufacturing using the airport site as an incentive. It would require the use of some CIL and 106 monies to upgrade the Twyford Bridge junction, but would provide much needed employment to the area.	Suggested changes: Allocate the former Bevercotes Colliery site for High Tech Manufacturing	Officer comments: The January 2022 Addendum proposes to allocate the Former Bevercotes Colliery site under Policy ST7 as a general employment site (EMO08a). The site has an implemented planning permission for employment use. Development would be expected to be consistent with that planning permission.

Representation Reference:	Refers to:	Legal compliance and soundness:	Summary of Comments:	Suggested changes by consultee:	Officer Comments
Name: Representation Reference: NRF-REF016.1 Name: Heaton Planning on behalf of land owner	Refers to: Policy ST10: Existing Employment Sites	Legal compliance and soundness: Plan is not legally compliant - does not comply with National Planning Policy. Plan is sound - not specified Plan complies with the Duty to Cooperate – not specified	Comments: The Policies Maps (August 2021) erroneously omit a site that is listed within Policy ST10 'Existing Employment Sites'. The site omitted is site ref. 'EES27 Chainbridge Lane, Lound' which Heaton's have previously promoted for inclusion as an existing employment site.	Suggested changes: Include the Tarmac site at Chainbridge Lane, Lound in Policy ST10	Officer comments: Agree that the Policies Map inadvertently omits to show the boundary for EES27 Chainbridge Lane, Lound. This will be identified as a proposed suggested change to the Policies Map, with the site boundary covering the existing employment site in use under Class E(g), B2, B8.
Representation Reference: NRF-REF023.2 Name: Carlton Forest Partnership	Refers to: Policy ST10: Existing Employment Sites	Legal compliance and soundness: Plan is legally compliant and sound - not specified Plan complies with the Duty to Cooperate – not specified	Comments: Existing employment site (Carlton Forest, Worksop) appears to have been given the wrong site reference number. The Policies Map identifies this as EES07, whereas Policy ST10 identifies this as EES10.	Suggested changes: Amend Policies Map: Carlton Forest, Blyth Road, Worksop should be ref EES10.	Officer comments: Agree that the Policies Map inadvertently references Carlton Forest as EES07. This will be identified as a proposed suggested change to the Policies Map, with the correct site reference being EES10.

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Representation Reference: REF031.4 Name: Derek Kitson Architectural Technologist Ltd	Refers to: ST11 1 a)-g) and paragraph 2	Legal compliance and soundness: Plan is legally compliant and complies with the Duty to Cooperate. Plan is unsound.	Comments: Policy ST11 is at odds with paragraphs 84 and 85 of the NPPF - supporting a prosperous rural economy. It is negative with criterion a) to g) - all have to be met for development to be acceptable, it is difficult to understand how this is in accordance with the aims of the NPPF.	Suggested changes: None	Officer comments: Policy ST11 is considered to be positively worded to support the sustainable growth and expansion of all types of business in rural areas. In accordance with the NPPF provides an appropriate balance with the need to respect the character of the countryside and provide safe access.
Representation Reference: REF031.5 Name: Derek Kitson Architectural Technologist Ltd	Refers to: Paragraphs 6.5.3, 6.5.4 and 6.5.5	Legal compliance and soundness: Plan is legally compliant and complies with the Duty to Cooperate. Plan is unsound.	Comments: For this policy to be in accordance with the aims of the NPPF it needs to be more positive and focus on promoting and supporting well based employment opportunities in the rural areas without having to prove any obvious links to agriculture or forestry etc. This distribution of employment creating opportunities in the countryside would support families in our rural communities.	Suggested changes: None	Officer comments: The supporting text is considered to be positively worded to support the sustainable growth and expansion of business in the rural area. In accordance with the NPPF it provides an appropriate balance with the need to respect the character of the countryside and provide safe access. However to aid interpretation a minor modification is proposed to paragraph 6.5.3 to clarify

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
					<p>what can comprise rural business: Rural businesses can include The type of businesses located in the rural area vary, and can include service based businesses, equestrian and animal related businesses as well as those linked to food production, or those which have strong functional links to local agriculture, forestry and other rural enterprise such as at Welbeck.</p>
<p>Representation Reference: REF033.13</p> <p>Name: Stone Planning Services Limited on behalf of Charterpoint (NG22) Limited</p>	<p>Refers to: Policy ST11 Rural Economic Growth and Economic Development Growth Outside Employment Areas.</p>	<p>Legal compliance and soundness: Plan is legally compliant and complies with Duty to Cooperate. Plan is unsound</p>	<p>Comments: Generally support the inclusion of Policy ST11. However, it does not recognise that the A1 is a major economic driver in the rural area. The Bassetlaw A1 Logistics Assessment 2021 recognises the economic value and potential of the A1 corridor. Suggest that the text be revised to recognise the A1 corridor and the potential this has to support economic development in the criteria set out in Policy ST11.</p>	<p>Suggested changes: None</p>	<p>Officer comments: Policy ST11 deals specifically with supporting a prosperous rural economy across the District which could include land within the locality of the A1 as well as land elsewhere. Proposals should be considered against all relevant Local Plan policies so it is not considered necessary to reference the A1 in Policy ST11.</p>

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Representation Reference: REF047.3 Name: Welbeck Estates	Refers to: Policy ST11/Welbeck Estate	<p>Legal compliance and soundness: Plan is legally compliant and complies with Duty to Cooperate.</p> <p>Plan is Unsound.</p>	<p>Comments: The Plan does not highlight the importance of the diversification and business growth which occurs on the Welbeck Estate. The wording of the policy restricts the Estate’s role as a place of enterprise for business that may locate there. The made Cuckney, Norton, Holbeck and Welbeck Neighbourhood Plan designates Welbeck as a settlement, but the Local Plan doesn’t. There needs to be alignment with the Neighbourhood Plan. There should a site-specific policy for rural Welbeck Estate relating to its diversification and reuse of heritage assets.</p>	<p>Suggested changes: The suggested wording for the proposed policy could be as follows: “The District Council will work with the Welbeck Estate and other partners to:</p> <ul style="list-style-type: none"> • Support the diversification of land uses across the site encompassing opportunities for tourism, economic development, leisure and accommodation, limited housing where permitted by the other policies of the Local Plan and community uses; • Support the diversification of land uses on the site that deliver the objectives of the Local Plan for both the rural and visitor economies; • Encourage the development of businesses and companies locally which 	<p>Officer comments: It is not considered that a site-specific policy is required for the Welbeck Estate. Policy ST11, in combination with other Local Plan policies provide for economic prosperity and inward investment, support the positive re-use of heritage assets and the appropriate provision of housing in the countryside as well as supporting job growth and upskilling of residents. This is considered sufficient. The settlement hierarchy in Policy ST1 classifies the settlements in terms of their relative sustainability. For rural Bassetlaw, these reflect the size of the settlement and the number of services and facilities they provide. This determines whether villages are identified as Large Rural Settlements, Small Rural Settlements or in the Countryside. The</p>

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
				<p>harness the education potential of the Welbeck Estate or local community, and secures the long-term future and positive redevelopment of heritage assets;</p> <ul style="list-style-type: none"> • Ensure that new development, where permitted by this policy, does not prejudice other policies of the Local Plan.” 	<p>Local Plan sets the strategic planning policy framework for the District; Neighbourhood Plans have to be ‘in general conformity’ with the strategic development Plan, but can also provide more detailed local planning policy and additional growth for their communities where this is justified and supported by the local community through a community referendum.</p>

Representation Reference:	Refers to:	Legal compliance and soundness:	Summary of Comments:	Suggested changes by consultee:	Officer Comments
Name: Representation Reference: REF014.8 Name: National Trust	Refers to: POLICY ST12: Visitor economy	Legal compliance and soundness: Legal compliance of plan - not specified. Plan is sound. Compliance with Duty to Co-operate - not specified.	Comments: None	Suggested changes: None	Officer comments: Noted
Representation Reference: REF047.7 Name: Welbeck Estates	Refers to: Policy ST12: Visitor Economy	Legal compliance and soundness: Plan is legally compliant and complies with Duty to Cooperate. Plan is Unsound.	Comments: Support the role of the policy to include visitor accommodation. There is great potential for additional amenities and untapped potential to enhance the visitor economy in rural Bassetlaw by supporting enterprise and the tourism offer.	Suggested changes: None	Officer comments: Noted

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Representation Reference: NRF-REF028.2 Name: Residents Against Peaks Hill Farm	Refers to: POLICY ST13: Town Centres, Local Centres, Local Shops and Services	Legal compliance and soundness: Not specified	Comments: Despite the council stating that there is significant investment in the town centre, there is little visual evidence of this. Further high street stores have closed, with the majority of shops now being charity shops and vape shops. There is significant development of fast-food outlets on the outskirts of the central business district. This implies to the local population that Worksop will become nothing more than a commuter town for significant commerce centres such as Doncaster, Sheffield, Nottingham, Lincoln, and Leeds where housing is significantly more expensive.	Suggested changes: Request: <ul style="list-style-type: none"> • a pause/stop and a reconsideration of the Plan to build on Peaks Hill Farm; • take into account the opinions of the residents of Worksop and their significant objections to the Plan. • everybody engages in consultation rather than being party politicised. • that all stated objections are addressed and acted upon before any further advancement happens regarding Peaks Hill Farm planning permissions. 	Officer comments: The regeneration of Worksop Town Centre is long term, with initiatives underway such as Middletons, Bridge Court expected to open in 2022. Closure of stores and the change in the town centre is common across the country partly as a result of the change in the national retail market. The Worksop Town Centre Masterplan provides a clear framework for the future of the town centre; the Council is continuing to work with partners to secure funding to regenerate the town. By providing for a wider range of better paid/higher skilled jobs in the district through the Local Plan, the strategy is one of self-containment, promoting more residents living and working in the district.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Representation Reference: REF029.1 Name: IDP Planning on behalf of land owner (Lidl GB Ltd)	Refers to: POLICY ST13 Town Centres, Local Centres, Local Shops and Services (Legal compliance and soundness: Plan is legally compliant and complies with the Duty to Cooperate. Plan is unsound.	Comments: Object to Criteria (5) as the policy test is whether ‘significant adverse impact’ would arise and not whether a proposal would “not adversely affect” the vitality and viability of a centre as a whole. NPPF Paragraph 91 states that where an application is likely to have a ‘significant adverse impact’ on one or more of the considerations in paragraph 90 it should be refused. Provided a proposed development is ‘within’ the local centre, trading impact on other facilities in that ‘local centre’ is not a material planning concern as it is located ‘within’ the centre and in a policy preferred location. The policy seeks to restrict development through a test which goes beyond national policy and is not justified.	Suggested changes: The following should be deleted from the policy wording “not adversely affect the vitality and viability of that centre” and replace with: “Development in the local centres will be supported where it would, individually or cumulatively with other permitted development, not lead to significant adverse impact on the vitality and viability of other centres within the hierarchy”	Officer comments: It is acknowledged that the wording of Policy ST13 5 should be clarified to align with the National Planning Policy Framework Policy. This will be identified as a proposed suggested change to Policy ST13 5: Development in the Local Centres will be supported where it would, individually or cumulatively with other permitted development, not lead to significant adverse impact on adversely affect the vitality and viability of the centre, or any other centres within the hierarchy;
Representation Reference: REF029.2 Name: IDP Planning on behalf of land owner (Lidl GB Ltd)	Refers to: POLICY ST13 Town Centres, Local Centres, Local Shops and Services	Legal compliance and soundness: Plan is legally compliant and complies with the Duty to Cooperate. Plan is unsound.	Comments: Policy ST13 10 deals with change of use or loss of any premises or land currently or last used as a local shop (Class Ea or F2a) outside the retail hierarchy, subject to two criteria. Such shops are outside a policy defined ‘centre’ and are not afforded any specific policy protection under the NPPF. The retail sector is constantly evolving. Criteria 10 is onerous by applying two considerations in every	Suggested changes: Amend criteria (10): “Proposals for the change of use or loss of any premises or land currently or last used as a local shop (Class Ea or F2a) outside the retail hierarchy will be permitted provided that:	Officer comments: It is considered that a proposed suggested change to Policy ST13 10 would provide a robust and flexible framework for the change of use of local shops to be managed. As follows: Proposals for the change of use or loss of any premises

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>situation. Criteria (a) is understood to ensure that the loss of a unit does not result in no local provision in an area, to also automatically require at least 12 months marketing could lead to a longer term vacancy of a unit. If there is other equivalent provision in the area the change of use should be permitted otherwise evidence of marketing for at least 6 months would confirm interest. Local demand, this should be clear over a 6 month period.</p>	<p>a) there is equivalent provision in the catchment area; or b) the applicant has provided clear evidence that the property has been openly marketed without a successful conclusion for a period of not less than 6 months on terms that reflect the lawful use and condition of the premises”</p>	<p>or land currently or last used as a local shop (Class Ea or F2a) outside the retail hierarchy will be only permitted where it can be demonstrated that: 10. a) there is sufficient equivalent provision in the catchment area; and or b) the applicant has provided clear evidence that the property has been openly marketed without a successful conclusion for a period of not less than 12 6 months on terms that reflect the lawful use and condition of the premises.</p>

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name: Representation Reference: REF048.11 Nottinghamshire County Council	Refers to: POLICY ST14: Management of Town Centres	Legal compliance and soundness: Not specified	Comments: Part 4.c)i The need for the provision of a pedestrian crossing point should be established. There is already a zebra crossing outside the Health Centre. There are few obvious desire-lines on Scrooby Road where pedestrians may wish to cross as the shops are laid out in a linear fashion. Should such a need for a crossing then be identified, this should be secured by condition.	Suggested changes: The need for the provision of a pedestrian crossing point should be established	Officer comments: HB001 extends Harworth town centre. Masterplanning work has identified a local aspiration for an improved pedestrian crossing point. The details will be established with NCC as the masterplan progresses. The mechanism to secure the infrastructure will be agreed at the time of application.
Representation Reference: NRF-REF001.2 Name: Resident	Refers to: POLICY ST14: Management of Town Centres	Legal compliance and soundness: Not specified	Comments: ST14 4.c)iii "support for healthy active lifestyles including space for local food growing" Healthy active lifestyles in Harworth and Bircotes needs to go a lot further than allotment space. With a town that will double in size and 2000 new homes and families investing in the area, there is a major need for increased leisure facilities, with a particular focus on health and activity. Taking into account the growth of the town, the current leisure centre will not be fit for purpose, and is arguably already in need of major investment with many residents going out of town to Doncaster and Maltby. Improved cycling links is pleasing and needs to be delivered. A safe green wheel around the town mentioned in previous town plans would be welcomed.	Suggested changes: Policy ST14 4 c) have a requirement for new leisure facilities in Harworth and Bircotes	Officer comments: The Built Facilities Study 2021 states there is sufficient capacity in Harworth & Bircotes Leisure Centre to meet current needs. The Local Plan does not identify housing allocations in the town, all the growth has planning permission and impacts have been mitigated through that process. Should an impact be identified at the leisure centre through the planning application process, the Local Plan identifies the use of planning obligations; these would be used to

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name:					improve existing facilities within Harworth and Bircotes rather than any newly built facilities.
Representation Reference: NRF-REF001.3 Name: Resident	Refers to: POLICY ST14: Management of Town Centres	Legal compliance and soundness: Not specified	Comments: Policy ST14 4.c)i have a traffic and speeding problem on Scrooby Road already. If the objective is to grow the town centre then we must develop the infrastructure and make this safer for pedestrians. As well as safe crossing there is a need for traffic calming measures such as speed bumps or cameras. The recently installed zebra crossings do not make it safer to cross and have witnessed several occasions where cars have continued speeding and ignored pedestrians.	Suggested changes: Policy ST14 4 c) i Requirement for traffic calming and pedestrian safety improvements to the town centre	Officer comments: The emerging Bassetlaw Local Plan is not proposing any further additional growth in Harworth and Bircotes. The Plan is however, seeking to extend the town centre and improve its offer. The emerging Harworth & Bircotes Town Centre Masterplan will explore options for pedestrian connectivity.
Representation Reference: NRF-REF008.4 Name: Retford Civic Society	Refers to: POLICY ST14: Management of Town Centres	Legal compliance and soundness: Plan is legally compliant: not specified Plan is unsound. Plan complies with Duty to Cooperate: not specified	Comments: Lack of detailed proposals for Retford town centre in the Plan. However it is working with others to address this by producing a Neighbourhood Plan for the area. Policy ST14 is welcomed as it will help protect the vitality and viability of Retford town centre but applies only to the 'Primary Shopping Area' which excludes Cannon Square. Object to this which fails to reflect the character and importance of this area. Cannon Square is in the conservation area and has a very high concentration of listed buildings and still have shopfronts. Although the centre of	Suggested changes: Include Cannon Square in Retford's Primary Shopping Area boundary. an Article 4 Direction restricting the change of use from Class E to residential should be made in Retford Town Centre.	Officer comments: The NPPF defines a primary shopping area where there is a concentration of retail uses. The proposed Primary Shopping Area boundary reflects the main concentration of retail outlets in Retford town centre. Cannon Square contains a mix of town centre uses so more appropriately sits within the town centre boundary

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>commerce in the town centre has shifted south, historically Cannon Square was the focus of retail activity and on the ground floor all the premises from the Olde Sun Inn to the library are still in commercial use. The character could be seriously harmed if ground floor premises are converted to residential use which would break up the continuity of business frontages, reduce footfall and the attractiveness of other premises for business use, and erode the character of the area as a whole. To prevent this an Article 4 Direction restricting change of use from Class E to residential should be made. BDC has indicated that it does not intend to consider any Article 4 Directions until after the Plan has been adopted and that in Retford any such Direction should be considered as part of the Neighbourhood Plan. Government policy states Directions should only apply in limited circumstances, it is unlikely that Cannon Square could be protected in this way unless it is included within the Primary Shopping Area.</p>		<p>(identified by Policy ST13) and is defined by the NPPF as the area including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area. Cannon Square also forms an important element of the Retford Conservation Area which recognises its value from a heritage perspective; conserving and enhancing the historic environment is covered by Policies ST42 and 43. The introduction of an Article 4 Direction is not a Local Plan matter.</p>

Living Communities

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name: Representation Reference: 1945074.4 Name: Inovo Consulting on behalf of Hallam Land Management	Refers to: POLICY ST15: Provision of Land for Housing	Legal compliance and soundness: Plan is legally compliant. Plan is sound. Plan complies with Duty to Co-operate.	Comments: Policy ST15 is supported in conjunction with Policy ST1 in its proposals to provide a minimum of 3,011 new homes to 2037 and particularly, the allocation of 1,000 dwellings to site HS1 Peaks Hill Farm, Worksop under Policy 16. Noting these figures are approximate, so flexibility is provided.	Suggested changes: None	Officer comments: Noted.
Representation Reference: REF009.6 Name: Fisher German on behalf of land owner	Refers to: Further allocation sites in Policy ST15 table on page 81. – LAA225 /LAA226/LAA227	Legal compliance and soundness: Legal compliance – not specified. Plan is unsound Compliance with Duty to Cooperate – not specified	Comments: It is considered that additional housing should be directed to Harworth & Bircotes in the emerging Local Plan and site allocations for the town be included within Policy ST15.	Suggested changes: The inclusion of LAA225 and or LAA226 and or LAA227 as an allocation site.	Officer comments: The Local Plan Trajectory shows sufficient delivery. Harworth & Bircotes has seen significant housing being delivered over the past 3 years (2019 – 2022) with over 369 home completions. As at 31 March 2022 there were 2,006 existing deliverable commitments in Harworth & Bircotes. This includes an outline planning permission (September 2021) for a re-profiled Harworth Colliery site. The 1,300 dwellings are in addition to the consented phases under construction. At least 1,133 dwellings from this permission are

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
					deliverable within the Plan period, thereby adding to the District's housing supply. There is therefore no requirement to allocate additional sites.
Representation Reference: REF010.10 Name: Severn Trent	Refers to: All development sites	Legal compliance and soundness: Legal compliance of plan - not specified. Soundness - not specified. Compliance with Duty to Co-operate - not specified.	Comments: All sites should be designed to incorporate SuDS which should be designed in accordance with current industry best practice the SuDS Manual C753, in accordance with the principles of the Drainage Hierarchy such that surface water flows are not directed towards sewers, resulting in development that is more resilient to the impacts of climate change. Recommend that development is designed to be water efficient; residential development should meet the optional water efficiency target which would support the aspirations of the Humber river basin catchment management plan. For non-residential sites recommend the development of sites in line with BREEAM very-good to excellent standard for water efficiency. All development should incorporate the principle of green/blue infrastructure; SuDS be incorporated into designs that support biodiversity and amenity for the site and the surrounding area. Some allocations are in Source	Suggested changes: None	Officer comments: All proposals should be considered against all relevant Local Plan strategic policies; SuDS is covered by Policies ST52 and ST53, water efficiency by Policy ST50 and water quality by Policy ST53. It is not considered necessary to include generic criterion in each site allocation policy unless there is a site specific issue that needs addressing by that development.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			Protection Zones; all development should ensure that appropriate treatment trains for surface water and protection of the aquifer from contamination.		
Representation Reference: REF012.1 Name: GraceMachin on behalf of land owner	Refers to: POLICY ST15 Housing Distribution	Legal compliance and soundness: Plan is legally compliant and complies with the Duty to Cooperate. Plan is unsound.	Comments: It is not considered a robust planning strategy to only seek one greenfield allocation on the edge of Worksop to 2037 (Peaks Hill Farm). Re-examination of the previous development areas submitted in Gateford must be considered if there is any concerns over the 'deliverability' of Peaks Hill Farm. This is important considering the size of the scheme (circa 1,000 new units). The impact of slow housing delivery would have a major impact on the housing trajectory. Homes are not projected to be delivered on site until 2026/27. Non-delivery would be catastrophic.	Suggested changes: A 'sound' plan would identify more than a single large housing allocation to meet the housing needs of the local Worksop community over the next 15 years from 2022. Peaks Hill should not be the sole greenfield housing allocation on the edge of Worksop* when it will be difficult to deliver *Worksop is the Main Town in the District (Paragraph 5.1.43) and planning to accommodate a third of all growth (Paragraph 5.1.35).	Officer comments: It is considered the Sustainability Appraisal, Land Availability Assessment and Site Selection Methodology are consistent with national policy and provide a robust basis to determine the most sustainable sites to meet the identified housing requirement. The MLUHC Housing Delivery Test measurement 14/1/2022 shows Bassetlaw has an excellent record of housing delivery. Over the past 3 years (2018 - 2021) 1905 dwellings were delivered against a requirement for 769 dwellings (248%). Bassetlaw's Five Year Housing Land Supply is currently 12.7 years. This does not include site allocations which increase the supply further. The May

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
					2022 Second Addendum updated the housing land supply for the 31 March 2022 base date. It provides for 12,551 dwellings (2020-2038) above the requirement of 10,746 dwellings providing an 17% contingency. The Whole Plan Viability Assessment states that Peaks Hill Farm is deliverable as part of a viable scheme.
Representation Reference: REF012.2 Name: GraceMachin on behalf of land owner	Refers to: POLICY ST15: Housing Distribution - Gateford Park LAA428	Legal compliance and soundness: Plan is legally compliant and complies with the Duty to Cooperate. Plan is unsound.	Comments: The LPA have incorrectly identified our client's land as Gateford Park when it should be identified as mixed grass and arable farmland - Gateford Hall Farm. The land holdings are of a comparable area with a woodland setting and new woodland could be delivered as part of a new scheme at Gateford.	Suggested changes: <ul style="list-style-type: none"> • Seek modifications to the Inset Map – Worksoop - to make this plan 'sound'. • A 'sound' plan would identify more than one large housing allocation to meet the housing needs of the local Worksoop community over the next 15 years from 2022. • Peaks Hill should not be the sole greenfield housing allocation on the edge of Worksoop* 	Officer comments: The Land Availability Assessment, January 2022 appropriately updated the records for LAA491a, LAA491b, and LAA491c. It is considered the Sustainability Appraisal, Land Availability Assessment and Site Selection Methodology are consistent with national policy and provide a robust basis to determine the most sustainable sites to meet the identified housing requirement in Worksoop and the rest of the District.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
				*Worksop is the Main Town in the District and planning to accommodate a third of all growth	
Representation Reference: REFO20.3 Name: Town Planning.co.uk on behalf of consultee	Refers to: POLICY ST15: Housing Distribution - Paragraph 7.1.4	Legal compliance and soundness: Plan is legally compliant and complies with the Duty To Cooperate. Plan is unsound.	Comments: It is unclear as to why only Tuxford has been chosen by the Local Plan to have a hybrid approach of having one site allocation with the remainder to be found by the Neighbourhood Plan. This approach undermines the work on the review of the Tuxford Neighbourhood Plan, including consultation on possible site allocations in September 2019 and does not allow either the Local Plan or the Neighbourhood Plan to consider all reasonable alternatives. Appendix 2 of the Site Selection Methodology (August 2021) states "Tuxford Neighbourhood Plan is in the process of being reviewed and all potentially suitable sites in the LAA can be considered for allocation through this process" thereby discounting them at Stage 3 in the site selection process. This lacks transparency that must underpin any Local Plan. Tuxford has 42% of its proposed housing requirement committed. Given this there is no requirement for the Local Plan to allocate a site to be delivered early in the plan period. Commitments in	Suggested changes: Delete site HS14 and allow the review of the Tuxford Neighbourhood Plan to consider other reasonable alternatives. Within Tuxford there are a number of potential previously developed sites or sites where existing uses no longer represent the most beneficial use, including land to the rear of 10 Newcastle Street; Former Goods Yard on Lincoln Road; the Platts Harris site; and Land around Eastfield Farm. Other potential sites around Tuxford would have a better relationship to existing built form such as LAA087 (NP11), which if properly assessed could allow the opportunity for a new primary school to be	Officer comments: It is considered the Sustainability Appraisal, Land Availability Assessment and Site Selection Methodology are consistent with national policy and provide a robust basis to determine the most sustainable sites to meet the identified housing requirement in the district over the plan period. All reasonable alternatives have been appropriately considered through the Sustainability Appraisal which has informed the Site Selection process. The Consultation Statement shows that all Local Plan consultations have been undertaken in accordance with, and have exceeded the requirements of the Local Planning regulations and the Council's Statement of

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>Tuxford will see growth of 8.4% in a short period. It would be reasonable for additional allocations to be delivered later in the plan period. The Local Plan allocation undermines the Neighbourhood Plan process, including the consultation, creating confusion about the relationship between the Neighbourhood Plan, the inclusion of two sites in the previous draft Plan; and one site in this version. The Neighbourhood Plan consultation responses were returned to Bassetlaw DC which does not help.</p>	<p>created next to Tuxford Academy.</p>	<p>Community Involvement. The Council has been positively working with Tuxford Parish Council and the Neighbourhood Plan group to support the Neighbourhood Plan review since 2018. Tuxford is a Large Rural Settlement in the second tier of the settlement hierarchy due to the range of services and facilities present. At 20% Tuxford's requirement is 250 dwellings during the Plan period. As at 1 April 2022 there were 27 existing dwelling commitments. In 2021/22 there were 84 completions, with 80 being delivered from the Ashvale Road site (19/01165/RES). There were no completions in the year 2020/21. The proposed allocation of Site HS14 will contribute to meeting housing need in Tuxford thereby supporting local services provision. The Land Availability Assessment 2022 identifies the site as suitable</p>

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
					to contribute to the housing requirement in Tuxford. The site is identified as available and deliverable from 2026. The Neighbourhood Plan consultation response forms had Tuxford Town Council's address as the return address.
Representation Reference: REF023.8 Name: Muller Property Group on behalf of land owner	Refers to: POLICY ST15: Housing Point 1.	Legal compliance and soundness: Plan is legally compliant and complies with the Duty to Cooperate. Plan is unsound	Comments: Identifies sites HS7 – HS13 as draft housing allocations in and around Retford to deliver 1,631 dwellings. Policy ST1 identifies a requirement for 2,128 dwellings to be delivered in Retford over the Plan Period. There are likely to be outstanding commitments that are yet to start, consider that there are over 500 dwellings within the town to meet the Town's needs up to 2037. Rather than relying on windfalls, should identify other allocations to meet this need. North of Bigsby Road is considered suitable to meet these needs. Have previously promoted two planning applications on land to the north of Retford. The latest application (19/01360/OUT) was recommended for approval by Officers, refused by Members, and the appeal was dismissed. Of the view that the issues raised by the Inspector are	Suggested changes: The plan is not effective; the draft allocations will not deliver the housing needs for the town in full. Additional sites are needed. Consider that alternative SUEs such as the land north of Bigsby Road in Retford should be considered as an alternative allocation.	Officer comments: It is considered the Sustainability Appraisal, Land Availability Assessment and Site Selection Methodology are consistent with national policy and provide a robust basis to determine the most sustainable sites to meet the identified housing requirement in the district over the plan period. All reasonable alternatives have been appropriately considered through the Sustainability Appraisal which has informed the Site Selection process. There is no evidence to demonstrate that the issues identified by the Inspector of the Bigsby Road appeal relating to

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name:			capable of being addressed and that the site is suitable for development and should be allocated in the Local Plan.		highway constraints can be addressed to the satisfaction of the Local Highways Authority.
Representation Reference: REF034.11 Name: Spawforths on behalf of the landowner	Refers to: POLICY ST15: Provision of Land for Housing	Legal compliance and soundness: Plan is not legally compliant, sound and it does not comply with the Duty to Cooperate.	Comments: Further land for housing is needed to be identified in the Local Plan, such as the site at Blyth Road, Blyth on the edge of Harworth & Bircotes. Provides further information on the site as part of the representations.	Suggested changes: Should allocate Albemarle Homes site at Blyth Road, Blyth/Harworth for housing.	Officer comments: As at 31 March 2022 there were existing extant permissions for 49 dwellings in Blyth. Between the 1 April 2020 and the 31 March 2022 there were 17 completions. There are 55 dwellings allocated in the neighbourhood plan without planning permission. This makes a total provision of 121 dwellings for Blyth. This satisfies the growth requirement for Blyth. It is therefore considered there is no need to allocate additional sites in Blyth.
Representation Reference: REF036.3 Name: Marrons Planning on behalf of Vistry Group	Refers to: POLICY ST15: Provision of Land for Housing	Legal compliance and soundness: Plan is legally compliant and complies with the Duty to Cooperate.	Comments: Locating new housing at Retford is justified because it is a sustainable settlement and a focus for local employment growth. Retford is the second largest town in the District and it has a wide range of services, shops and employment opportunities, and good public transport links. Development here provides an opportunity to maximise	Suggested changes: <ul style="list-style-type: none"> The housing requirement should be amended to take account of likely lapse rates in housing delivery from those sites without detailed planning permission. 	Officer comments: The May 2022 Second Addendum included an updated housing land supply position, showing at 31 March 2022 a 17% buffer in the supply. This provides for a contingency against non-delivery. There is no longer a

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
		Plan is unsound.	sustainable transport choices such as the East Coast Mainline Railway Station. There is a reliance on housing allocations HS7 (Trinity Road, 244 dwellings) and HS13 (Ordsall South, 800 dwellings) to meet the housing needs of the town. Any delay in these sites coming forward will affect the ability to meet the housing needs locally and the District, and undermine the important role that Retford plays in the settlement hierarchy. The housing trajectory shows that development at site HS13 is not expected to start until at least 2027 and is dependent on off-site junction improvements. As it extends beyond the plan period, any delay in this site coming forward would affect housing delivery later in the plan period. Allocating additional land would provide an appropriate buffer that housing needs will be met. A balanced portfolio of sites is needed to ensure the identified housing requirement is met. Should consider other allocations to protect against delivery issues at the larger sites, and which can make an early contribution to housing supply, helping to maintain the momentum that has been achieved in recent years. The information provided demonstrates the site: is deliverable, available and achievable; can be delivered without unacceptable harm to	<ul style="list-style-type: none"> • The housing supply should be justified with evidence, and assumptions in relation to windfalls updated and kept under review. • The Local Plan should allocate additional sites to achieve a balance in the portfolio of sites, including land west of Tiln Lane, Retford. 	requirement in the NPPF to apply a lapsed rates discount. The Housing Supply, Trajectory and Windfall Allowance Background Paper May 2022 clarifies the approach to windfalls. It is considered the Sustainability Appraisal, Land Availability Assessment and Site Selection Methodology are consistent with national policy and provide a robust basis to determine the most sustainable sites to meet the identified housing requirement. All reasonable alternatives have been appropriately considered through the Sustainability Appraisal which has informed the Site Selection process.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			the setting of nearby heritage assets; landscape; provides for Biodiversity Net Gain; is within walking distance of public transport local shops and services. Addresses the points in the SA about flood risk and impact on designated wildlife.		
Representation Reference: REF036.4 Name: Marrons Planning on behalf of Vistry Group	Refers to: POLICY ST15: Provision of Land for Housing - Supply over the Plan Period	Legal compliance and soundness: Plan is legally compliant and complies with the Duty to Cooperate. Plan is unsound.	Comments: The Local Plan states that to meet Bassetlaw's housing requirement of 10,047 dwellings, housing delivery needs to remain at the 'high levels' experienced over the last few years. This has averaged 584 dwellings per annum over the last five years (Local Plan Para 5.1.21). There has been a significant uplift in completions over the previous five year period and completions in the preceding five year period were much lower. The average was just 272 dwellings per year between 2011/12 - 2014/15. To ensure the higher rate of delivery is maintained it is best achieved through a reliable and varied portfolio of housing sites. The housing trajectory at April 2021, has almost 50% of the housing requirement as committed sites with extant planning permission and 4% via Neighbourhood Plans allocations without planning permission. This is the majority of the housing supply over the Plan period. The housing trajectory does not envisage any completions from the	Suggested changes: <ul style="list-style-type: none"> • The housing requirement should be amended to take account of likely lapse rates in housing delivery from those sites without detailed planning permission. • The housing supply should be justified with evidence, and assumptions in relation to windfalls updated and kept under review. • The Local Plan should allocate additional sites to achieve a balance in the portfolio of sites, including land west of Tiln Lane, Retford. 	Officer comments: Delivery is based on up to date evidence in the LAA and Five Year Housing Land Supply Position Statement, 2021. The majority of outline commitments are expected to come forward beyond year 5. Outline commitments have been counted in the first five years where there is strong evidence to support this. The May 2022 Second Addendum included an updated housing land supply position, showing at 31 March 2022 a 17% buffer in the supply. This provides for a contingency against non-delivery. There is no longer a requirement in the NPPF to apply a lapsed rates discount. The Housing Supply, Trajectory and Windfall Allowance

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>Local Plan or Neighbourhood Plan allocations in the first five years of the plan, with completions from 2025/26. Does not provide any evidence that sites with outline planning permission for major housing development will come forward during the plan period. Without evidence, these cannot be considered deliverable in accordance with NPPF. Need to closely monitor housing delivery to be confident existing commitments will come forward in a timely manner. The Council assumes a windfall allowance of 100 dwellings per annum, from Year 6 of the Plan onwards (approaching 10% of the total supply). The calculation appears to be based on smaller sites, which were too small to be allocated, equating to 115 dwellings per annum. There is no certainty that past sources of windfall will continue. Note that the LAA was comprehensive and assessed sources as low as five dwellings. This acknowledges that in recent years, all the dwellings in Bassetlaw have been on unallocated sites because the Core Strategy did not allocate sites. Difficult to rely on past trend averages to establish the number of homes on windfall sites. As the NPPF states, the evidence that windfalls can be relied upon should be compelling for them to be included in the housing supply.</p>		<p>Background Paper May 2022 clarifies the approach to windfalls.</p>

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
<p>Representation Reference: REF036.5</p> <p>Name: Marrons Planning on behalf of Vistry Group</p>	<p>Refers to: POLICY ST15: Provision of Land for Housing - Proposed Allocations</p>	<p>Legal compliance and soundness: Plan is legally compliant and complies with the Duty to Cooperate.</p> <p>Plan is unsound.</p>	<p>Comments: In addition to completions from the first year of the plan period and commitments, land for approximately 3,011 new dwellings will be allocated during the plan period. This does not correspond with the figure in the table at para 5.1.41, which states that 3,639 Local Plan site allocations will be made. The Local Plan identifies housing supply of 12,198 dwellings, which provides a headroom of 2,151 dwellings (21.4% against the housing requirement). The Plan seeks to ensure flexibility in the figures, housing delivery is reliant upon larger strategic sites and the Bassetlaw Garden Village proposal which will provide for 2,300 dwellings (76.4%) of the 3,011 dwellings that are expected to come from allocated sites. Two (HS1: Peaks Farm, and HS 13: Ordsall South) will extend into the next plan period, as will the Bassetlaw Garden Village (500 dwellings). The focus on a limited number of sites means that market absorption rates will be a factor, and could limit the ability to increase the pace of supply were the sites to be delayed. This would result in a loss of housing completions from the plan period. Land is safeguarded under policy ST56 for an east-west distributor link road at Peaks Hill Farm, to support the delivery</p>	<p>Suggested changes:</p> <ul style="list-style-type: none"> • The housing requirement should be amended to take account of likely lapse rates in housing delivery from those sites without detailed planning permission. • The housing supply should be justified with evidence, and assumptions in relation to windfalls updated and kept under review. • The Local Plan should allocate additional sites to achieve a balance in the portfolio of development sites including land west of Tiln Lane, Retford. • The technical information provided with these representations demonstrate the site is deliverable, available and achievable and addresses the points raised in the SA about flood risk and 	<p>Officer comments: The May 2022 Second Addendum included an updated housing land supply position, showing at 31 March 2022 a 17% buffer in the supply. This provides for a contingency against non-delivery. There is no longer a requirement in the NPPF to apply a lapsed rates discount. The Housing Supply, Trajectory and Windfall Allowance Background Paper May 2022 clarifies the approach to delivery and windfalls. The difference between the figures in Policy ST1 and in ST15 is because Worksop Central housing sites are not included in Policy ST15. It is considered that the delivery timeframes in the housing trajectory are an accurate reflection of the delivery of sites of this type, and have been informed by site promotor/developer views. There is no evidence to indicate that Tiln Lane would</p>

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>of Site HS1. This is a significant piece of infrastructure. A number of junction improvements are required to deliver site HS13. The respective Local Plan policies indicate that contributions will also be sought towards these improvements from sites HS7, HS9 and HS10 in Retford. Ordsall South would be the main contributor; any delay in its delivery could affect the ability to deliver the other Retford allocations. Tiln Lane, Retford is located on the northern side of the town and is not reliant on these infrastructure improvements. Bassetlaw Garden Village is a long-term sustainable growth plan for the District. 500 dwellings will be provided by 2037, with a view to providing greater flexibility in the housing supply through increased choice and competition. The delivery is potentially subject to lengthy lead-in times. There is no certainty as to timescales, and no certainty it will contribute to housing supply during the plan period.</p>	<p>impact on designated wildlife sites</p>	<p>not be required to contribute to off site highways improvements in Retford. The May 2022 Second Addendum withdraws the Garden Village from the Local Plan.</p>
<p>Representation Reference: REF038.4 Name: Fisher German on behalf of land owner</p>	<p>Refers to: POLICY ST15: Housing Distribution - Site HS7</p>	<p>Legal compliance and soundness: Legal compliance – not specified. Soundness – not specified.</p>	<p>Comments: The identification of Trinity Farm, Retford for residential development is supported. The site is sustainably located and can deliver a comprehensive development. It is capable of delivering a higher number of units than proposed. Accept the Policy uses ‘minimum’ to express the number of</p>	<p>Suggested changes: None</p>	<p>Officer comments: The January 2022 Addendum amended the capacity of Trinity Farm to 305 dwellings. This is considered an appropriate housing figure for the site.</p>

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
		Compliance with Duty to Cooperate – not specified	dwellings deliverable, it is considered that the policy should be amended to reflect the true capacity more closely. Support the removal of site HS7: Leaffields, Retford and would object to its re-inclusion. The allotments at Leaffields are a much-valued community facility, and to remove established allotments from the site to Trinity Farm as previously proposed, would have been unsound.		
Representation Reference: REF040.2 Name: McLoughlin Planning on behalf of land owner	POLICY ST15: Housing Distribution - Housing Trajectory	Legal compliance and compliance with Duty to Cooperate - not specified. Plan is unsound.	Comments: Have concerns that the Council are underestimating the speed in which allocations will come forward and the starting date for proposed new larger allocations. This means that there is a question as to whether the sites will deliver the housing required during the plan period.	Suggested changes: <ul style="list-style-type: none"> • bring forward site LAA206 (preferred option) on the edge of Worksop as an allocation to reduce the risk of future under delivery as part of policy HS15. This site is deliverable and has a reliable developer to bring the site forward. • amend the proposed policy map to address the issues with policies GG4 and ST38. 	Officer comments: The May 2022 Second Addendum included an updated housing land supply position, showing at 31 March 2022 a 17% buffer in the supply. This provides for a contingency against non-delivery. The Housing Supply, Trajectory and Windfall Allowance Background Paper May 2022 clarifies the approach to delivery. It is considered the Sustainability Appraisal, Land Availability Assessment and Site Selection Methodology are consistent with national policy and provide a robust basis to determine the most sustainable sites to meet the

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
					identified housing requirement. All reasonable alternatives have been appropriately considered through the Sustainability Appraisal which has informed the Site Selection process. It is considered that the Green Gap Study appropriately evidences the identification of green gap GG4.
Representation Reference: REF045.3 Name: Agent on behalf of land owner	Refers to: POLICY ST15: Housing Distribution - Spatial Strategy/Site Allocations	Legal compliance and soundness: Plan is legally compliant and complies with the Duty to Cooperate. Plan is Unsound.	Comments: Concerns that approximately 63% of housing to be allocated falls across three large strategic sites. Such sites can experience slow delivery rates owing to: land ownership issues; complex legal agreements; cumbersome planning applications; slow infrastructure delivery; limitation of choice in the market restricting developer interest. Ordsall South suffers from landscape impacts and flood risk; Peaks Hill Farm suffers from constraints relating to ecology, highways, proximity to services and highway access; and Bassetlaw Garden Village suffers from constraints relating to archaeology, heritage and potential impacts on the Sherwood Forest Special Protection Area.	Suggested changes: Should seek to allocate land outside of settlement boundaries, particularly in more rural locations which would see the greatest benefit from investment in their communities.	Officer comments: The Council currently has 12.7 years of housing land supply. As such, it is not solely reliant on the three large allocations to meet the housing need. There are also smaller sites proposed for allocation. The May 2022 Second Addendum included an updated housing land supply position, showing at 31 March 2022 a 17% buffer in the supply. This provides for a contingency against non-delivery. The Housing Supply, Trajectory and Windfall Allowance Background Paper May 2022

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>By proposing three strategic sites in the south of the District, and none in the north, runs the risk of creating economic division between the north and south of the District. With regard to those sites identified within the existing settlement boundaries of Worksop and Retford, it is unnecessary to allocate sites which benefit from a favourable planning outlook given their location. Should instead seek to allocate land outside of settlement boundaries, in more rural locations which would see the greatest benefit from investment in their communities. By focusing housing allocations in three settlements, the spatial strategy fails to provide a diverse choice of housing land and fails to take account of its Strategic Objectives.</p>		<p>clarifies the approach to delivery. Growth is distributed in accordance with the settlement hierarchy, in the first instance to the 3 Main Towns , then the 5 Large Rural Settlements, which provides growth district-wide. It is considered the Sustainability Appraisal, Land Availability Assessment and Site Selection Methodology are consistent with national policy and provide a robust basis to determine the most sustainable sites to meet the identified housing need. All reasonable alternatives have been appropriately considered through the Sustainability Appraisal which has informed the Site Selection process. The May 2022 Second Addendum withdraws the Garden Village from the Local Plan.</p>

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Representation Reference: 1912509.1 Name: Resident	Refers to: SITE HS1: Peaks Hill Farm, Workshop	Legal compliance and soundness: Plan is not legally compliant. Plan is unsound. Plan does not comply with Duty to Co-operate.	Comments: The original consultation was not widely advertised to residents. Only one poster advertising the consultation at the end of a cul-de-sac. The initial consultation also took place at 3pm, which restricted which residents could attend. The second consultation took place during a pandemic via Teams/Zoom, unadvertised unless you were on a mailing list, limited to only 35 attendees, and unfair to a huge portion of the local population who don't have use of internet and understanding of online tools.	Suggested changes: Every resident should be personally contacted with the details of all planned meetings, how to attend, where they can access the information and request documents be posted to them. All consultations should be operated where every voice should be listened to rather than be told to email or write in. It needs to be inclusive to every group including the elderly, infirm, housebound and those restricted by work hours and child care / school hours.	Officer comments: The Consultation Statement shows that all Local Plan consultations have been undertaken in accordance with, and have exceeded the requirements of the Local Planning regulations and the Council's Statement of Community Involvement.
Representation Reference: 1945074.5 Name: Inovo	Refers to: Paragraph 7.2.4 of supporting text for	Legal compliance and soundness: Plan is legally compliant.	Comments: Note the reference in para. 7.2.4 to the complex nature of delivering a large urban extension; it is considered that the expectation for delivery not to proceed until 2026 is unduly pessimistic. Work is already underway in preparing a	Suggested changes: Modification to 7.2.4 and the Housing trajectory required to reflect	Officer comments: The May 2022 Second Addendum revisits the housing trajectory. However, it is considered

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Consulting on behalf of Hallam Land Management	POLICY 16: Site HS1: Peaks Hill Farm, Workshop	Plan is sound. Plan complies with Duty to Co-operate.	masterplan for the site and the promoters of the site remain committed to working and engaging with the Council in the preparation of supporting studies and surveys for a planning application during the Local Plan process. This will enable end users and developers to ensure early delivery from the site. It is considered that the site could deliver dwellings as early as 2024/5 which would support the potential for more dwellings than 1,000 coming forward within the plan period.	commencement of Development of Peaks Hill Farm in 2024/5	that the delivery timescales identified in para 7.2.4 are broadly appropriate to inform the anticipated delivery of the site.
Representation Reference: 1945105.1 Name: Inovo Consulting on behalf of Hallam Land Management	Refers to: Paragraph 2(a)(iv) of POLICY 16: Site HS1: Peaks Hill Farm, Workshop	Legal compliance and soundness: Plan is legally compliant. Plan is sound. Plan complies with Duty to Co-operate.	Comments: Support Policy 16. But at sub-paragraph: 2. (a) (iv) note the reference to use of level access accommodation and bungalows along the urban-rural interface. Noting that this falls under the heading relating to “Good quality design and local character” it would seem the objective of this requirement is to enable a visual transition along the new urban-rural boundaries of the site that will be created by the development. This objective is supported in principle but the specific reference to bungalows is considered overly prescriptive and should be omitted.	Suggested changes: Omit reference to bungalows in Policy16.2(a) (iv)	Officer comments: Policy 16 2 a) iv states ‘use of level access accommodation, such as bungalows, along the urban-rural interface, where appropriate’. It is considered that this criterion, with the inclusion of ‘where appropriate’ provides sufficient flexibility to developers.
Representation Reference: 1945105.2 Name: Inovo Consulting on behalf of Hallam	Refers to: Paragraph 2(e) of POLICY 16: Site HS1: Peaks Hill Farm, Workshop	Legal compliance and soundness: Legal compliance not specified.	Comments: The requirement for a mix of housing types and tenures at ST16:2 e) to meet local needs including affordable housing is acknowledged. However we have concerns regarding the requirements for affordable housing as set out in Policy ST29 (See 1945105.3).	Suggested changes: Amend policy ST16:2 (e) to refer to assessment of viability at outline stage.	Officer comments: The May 2022 Second Addendum amends Policy ST29. The Whole Plan Viability Assessment 2022 states that the affordable housing requirement can be achieved alongside

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Land Management		Soundness of plan not specified. Compliance with Duty to Co-operate not specified.			other Local Plan requirements as part of a financially viable scheme. It is considered that criterion 8 of Policy ST29, consistent with national policy, provides developers with the appropriate mechanism to re-assess affordable housing delivery through an Open Book Viability Assessment should they consider the affordable housing requirement be unviable.
Representation Reference: 1945119.3 Name: The Woodland Trust	Refers to: POLICY 16: Site HS1: Peaks Hill Farm, Worksop	Legal compliance and soundness: Legal compliance of plan not specified. Plan is unsound. Compliance with Duty to Co-operate not specified.	Comments: Peaks Hill Farm has limited impact on veteran or notable trees, which are recorded on the Woodland Trust's Ancient Tree Inventory. Specifically, a veteran beech tree (ATI number: 212560). Should reconsider the allocation, otherwise they could make the plan unsound by breaching both NPPF policy and your own local plan policy on ancient/veteran tree protection.	Suggested changes: If goes ahead, would like to see adequate buffering put in place to protect the affected trees from likely adverse impacts from the development. Further discussion of what buffering might be appropriate can be found in the Woodland Trust's Planners Manual on	Officer comments: It is considered that adequate buffering can be incorporated into the masterplan for the site to ensure that there is no adverse impact from development upon the identified veteran beech tree. It is considered that a proposed suggested change to Policy 16 g (new criterion ii) will address the matter as follows: the

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
				Ancient Woodland and Veteran Trees.	protection of veteran beech tree (ATI number: 212560) in accordance with Policy 41, informed by a suitable compensation strategy.
Representation Reference: 1945371.5 Name: Bassetlaw Conservative Councillor Group	Refers to: Policy 16: Site HS1: Peaks Hill Farm	Legal compliance and soundness: Plan is not legally compliant, sound or complies with Duty to Cooperate.	Comments: Residents of the planned major developments in Thievesdale, Worksop for 1,000 houses are strongly opposed to the plans and we support them. These developments should be stopped.	Suggested changes: These developments should be stopped and taken out of the local plan.	Officer comments: Noted.
Representation Reference: 1946616.1 Name: Resident	Refers to: POLICY 16: Site HS1: Peaks Hill Farm, Worksop	Legal compliance and soundness: Plan is not legally compliant. Plan is sound. Compliance with Duty to Cooperate not specified.	Comments: Not enough effort was made to inform local people especially those that do not have access to social media. Don't feel the plan is sound as there will be too many houses for local infrastructure to cope with. There are not enough primary or secondary school places for children in Worksop and people are not going to want to move to a town where there are not school places for their children. The amount of houses proposed is far more than the government propose. The habitat of wildlife will be destroyed. It could also put health services under pressure as GP surgeries are struggling to accommodate appointments and don't have a children's ward at	Suggested changes: Completely wrong to build on farmland and the council should be looking at alternative sites if more houses must be built.	Officer comments: The Consultation Statement shows that all Local Plan consultations have been undertaken in accordance with, and have exceeded the requirements of the Local Planning regulations and the Council's Statement of Community Involvement. It is considered Policy 16, informed by infrastructure

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>Bassetlaw hospital. Stated there were no plans to join up Worksop and Carlton-in-Lindrick yet these homes will practically do that. The traffic at the cannon lights will be a huge problem and people will not go through Gateford as was suggested as they are likely to be heading to town, schools or supermarkets.</p>		<p>partners views, appropriately provides for infrastructure required to support Peaks Hill Farm, including for education, health and transport. National policy states that the standard method is a minimum starting point for assessing housing need. National policy states that the housing requirement figure can exceed that. The plan protects valuable wildlife habitats and seeks 10% biodiversity net gain on site. The site will not join Worksop to Carlton in Lindrick; the plan identifies a green gap to prevent coalescence of the settlements.</p>

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Representation Reference: NRF-REF028.1 Name: Residents Against Peaks Hill Farm	Refers to: Policy 16 HS1 Peaks Hill Farm	Legal compliance and soundness: Not specified	Comments: The statement for a petition identified the following points: Use of greenbelt land; Erosion of rich farmland; Erosion of wildlife habitats, including mature woods for birds, bats, wild game and even a family of wild deer; Pressure on already pressured public infrastructures especially Schools, NHS hospitals, community services, doctors, and dentists; Pressure on our road systems into and out of Worksop including the A57, A60 & Blyth Road; Pressure on our hotspot junctions at Cannon Crossroads and accident hotspots at Thievesdale Lane into Blyth Road and Farmers Branch into Blyth Road. The number of new builds the council are stating Worksop requires is far higher than the government figures specified, in fact it is more than double the amount required.	Suggested changes: By lodging this one petition of over 1600 voices, request a pause/stop and a reconsideration of the Plan to build on Peaks Hill Farm. Request you take into account the opinions of the residents of Worksop and their significant objections to the Plan. Request that everybody engages in consultation rather than being party politicised. Request that all stated objections are addressed and acted upon before any further advancement happens regarding Peaks Hill Farm Planning permissions.	Officer comments: The Consultation Statement shows that all Local Plan consultations have been undertaken in accordance with, and have exceeded the requirements of the Local Planning regulations and the Council's Statement of Community Involvement. All comments made have been analysed and where appropriate changes made to the Local Plan. Bassetlaw does not have green belt. Brownfield land is identified for development where possible, but there are not sufficient suitable and available brownfield sites to meet needs. The plan protects valuable wildlife habitats and seeks 10% biodiversity net gain on site. Policy 16 protects the woodland on site and requires any loss to be re-

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
					provided on site. It is considered Policy 16, informed by infrastructure partners views, appropriately provides for infrastructure required to support Peaks Hill Farm, including for education, health and transport. National policy states that the standard method is a minimum starting point for assessing housing need. National policy states that the housing requirement figure can exceed that.
Representation Reference: REF012.1 Name: GraceMachin on behalf of land owner	Refers to: Supporting text of Policy 16: HS1 Peaks Hill Farm - Paragraph 7.2.4 and allocation of PHF in Policy ST15 Housing Distribution	Legal compliance and soundness: Plan is legally compliant and complies with the Duty to Cooperate. Plan is unsound.	Comments: It is not considered a robust planning strategy to only seek one greenfield allocation on the edge of Worksop to 2037 (Peaks Hill Farm). Re-examination of the development areas submitted in Gateford, must be considered by the Inspector if he / she has any concerns over the 'deliverability' of units at Peaks Hill Farm. This is an important matter considering the size of the scheme (circa 1,000 new units). The impact of slow housing delivery would have a major impact on the housing trajectory. Homes are not projected to be delivered on site until 2026/27 – see Paragraph 7.2.4 of the Plan. Non delivery would be catastrophic.	Suggested changes: A 'sound' plan would identify more than a single large housing allocation to meet the housing needs of the local Worksop community over the next 15 years from 2022. Peaks Hill should not be the sole greenfield housing allocation on the edge	Officer comments: The May 2022 Second Addendum included an updated housing land supply position, showing at 31 March 2022 a 17% buffer in the supply. This provides for a contingency against non-delivery. The Housing Supply, Trajectory and Windfall Allowance Background Paper May 2022 clarifies the approach

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
				of Worksop* when it will be difficult to deliver *Worksop is the Main Town in the District (Paragraph 5.1.43) and planning to accommodate a third of all growth (Paragraph 5.1.35).	to delivery. It is considered the Sustainability Appraisal, Land Availability Assessment and Site Selection Methodology are consistent with national policy and provide a robust basis to determine the most sustainable sites to meet the identified housing requirement.
Representation Reference: REF012.3 Name: GraceMachin on behalf of land owner	Refers to: Policy 16 HS1 Peaks Hill Point c)	Legal compliance and soundness: Plan is legally compliant and complies with the Duty to Cooperate. Plan is unsound.	Comments: Peaks Hill requires more historical and archaeological assessment, not aware of any clear 'benchmarking' against proposed development areas on the edge of Gateford, Worksop. There are several heritage assets in the locality of Peaks Hill including the listed Broom Farm and Freshfields which have statutory protection. Concerned about the impact of development on these assets.	Suggested changes: A 'sound' plan would identify more than a single large housing allocation to meet the housing needs of the local Worksop community over the next 15 years from 2022. Peaks Hill should not be the sole greenfield housing allocation on the edge of Worksop* when it will be difficult to deliver *Worksop is the Main Town in the District	Officer comments: It is considered that the Site Assessments (Historic Environment) Methodology Update January 2022 provides a robust and comprehensive assessment of heritage matters relating to the reasonable alternative sites.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
				(Paragraph 5.1.43) and planning to accommodate a third of all growth (Paragraph 5.1.35).	
Representation Reference: REF012.4 Name: GraceMachin on behalf of land owner	Refers to: Suitability, availability and deliverability of Policy 16 HS1 Peaks Hill Farm	Legal compliance and soundness: Plan is legally compliant and complies with the Duty to Cooperate. Plan is unsound.	Comments: The proposed allocation of a single large greenfield site on the edge of Worksop is a high-risk strategy in terms in housing delivery. Anticipate that the Inspector will want to question the logic of a single housing allocation on the edge of Worksop when other sites are suitable, available, and deliverable. Peaks Hill will be a complex site to deliver, and expect that a debate on its suitability and deliverability will be heard by a Planning Inspector. Represent a major landowner on the edge of Worksop who has consistently delivered housing sites to the Worksop market over many years. To allocate a single complex greenfield site on the edge of Worksop is 'high risk'.	Suggested changes: A 'sound' plan would identify more than a single large housing allocation to meet the housing needs of the local Worksop community over the next 15 years from 2022. Peaks Hill should not be the sole greenfield housing allocation on the edge of Worksop* when it will be difficult to deliver *Worksop is the Main Town in the District (Paragraph 5.1.43) and planning to accommodate a third of all growth (Paragraph 5.1.35).	Officer comments: The May 2022 Second Addendum included an updated housing land supply position, showing at 31 March 2022 a 17% buffer in the supply. This provides for a contingency against non-delivery. The Housing Supply, Trajectory and Windfall Allowance Background Paper May 2022 clarifies the approach to delivery. It is considered the Sustainability Appraisal, Land Availability Assessment and Site Selection Methodology are consistent with national policy and provide a robust basis to determine the most sustainable sites to meet the identified housing requirement.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Representation Reference: REF012.5 Name: GraceMachin on behalf of land owner	Refers to: Policy 16 HS1 Peaks Hill Point I) with sub sections i., ii., iii., iv., v., vi., vii.	Legal compliance and soundness: Plan is legally compliant and complies with the Duty to Cooperate. Plan is unsound.	Comments: Question that Peaks Hill is the most appropriate location for transport and communication. It is relatively remote from the A57 which provides the majority of communication east, west and south, as well as traffic north to the M1. The A57 is undoubtedly the main commuting route for the town. Peaks Hill is also remote from the railway stations at Worksop and Shireoaks. It should be noted that Shireoaks Station can be reached ON FOOT from Gateford.	Suggested changes: A ‘sound’ plan would identify more than a single large housing allocation to meet the housing needs of the local Worksop community over the next 15 years from 2022. Peaks Hill should not be the sole greenfield housing allocation on the edge of Worksop* when it will be difficult to deliver *Worksop is the Main Town in the District (Paragraph 5.1.43) and planning to accommodate a third of all growth (Paragraph 5.1.35).	Officer comments: The site adjoins the northern edge of Worksop, the district’s principal town between Blyth Road and Carlton Road so is well placed in terms of transport and communication and moving around the district. Policy 16 makes provision for a financial contribution to extend bus services to the northern part of Worksop and to provide appropriate connectivity by walking and cycling, in addition to a new distributor road making movement for all much more straightforward.
Representation Reference: REF025.2 Name: Resident	Refers to: POLICY 16: Site HS1: Peaks Hill Farm, Worksop	Legal compliance and soundness: Legal compliance of	Comments: The plan has not fully considered the transport issues that will be created if a huge volume of additional housing is developed in the area. Building over 1000 new houses on Peaks Hill will result in a massive increase in people commuting in and out of Worksop by road and rail. The	Suggested changes: Need to fully consider the impact on the wider community including the impact of increased traffic	Officer comments: It is considered that the Bassetlaw Transport Study 2022, accepted by the Local Highways Authority appropriately considers the

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
		<p>plan not specified.</p> <p>Plan is unsound.</p> <p>Compliance with Duty to Co-operate not specified.</p>	<p>employment opportunities in Worksop are very limited and this will remain the case even if new businesses are developed on Peaks Hill. There are huge pressures on Worksop's commuting infrastructure. If over 1000 new homes are built in Worksop it will result in a significant increase in the volume of people travelling by road and rail to visit other nearby Towns and Cities to shop and socialise, with only minimal benefit to the economy of Worksop. Building a new road on Peaks Hill and a few new roundabouts in the area will not resolve the significant increased congestion issues that will be created on the main roads leading out of Worksop.</p>	<p>and increased demand on trains and other transport. Should clearly explain how it will address the commuter issues that will be created in Worksop if a huge volume of additional housing is developed.</p>	<p>transport issues associated with Local Plan growth including from Peaks Hill Farm and identifies proportionate financial contributions to improve relevant junctions and links in the district, including Worksop, which for Peaks Hill Farm are identified in Policy 16. The Local Plan aligns jobs with housing. It is considered that this will promote self-containment which will have a positive impact on outward commuting benefitting the district including the town centres.</p>
<p>Representation Reference: REF026.2</p> <p>Name: Resident</p>	<p>Refers to: POLICY 16: Site HS1: Peaks Hill Farm, Worksop</p>	<p>Legal compliance and soundness: Legal compliance of plan not specified.</p> <p>Plan is unsound.</p>	<p>Comments: The plan has not fully considered the transport issues that will be created if a huge volume of additional housing is developed in the area. Building over 1000 new houses on Peaks Hill will result in a massive increase in people commuting in and out of Worksop by road and rail. The employment opportunities in Worksop are very limited and this will remain the case even if new businesses are developed on Peaks Hill. There are huge pressures on Worksop's commuting infrastructure. If over 1000 new</p>	<p>Suggested changes: Need to fully consider the impact on the wider community including the impact of increased traffic and increased demand on trains and other transport. Should clearly explain how it</p>	<p>Officer comments: It is considered that the Bassetlaw Transport Study 2022, accepted by the Local Highways Authority appropriately considers the transport issues associated with Local Plan growth including from Peaks Hill Farm and identifies</p>

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
		Compliance with Duty to Co-operate not specified.	homes are built in Worksop it will result in a significant increase in the volume of people travelling by road and rail to visit other nearby Towns and Cities to shop and socialise, with only minimal benefit to the economy of Worksop. Building a new road on Peaks Hill and a few new roundabouts in the area will not resolve the significant increased congestion issues that will be created on the main roads leading out of Worksop.	will address the commuter issues that will be created in Worksop if a huge volume of additional housing is developed.	proportionate financial contributions to improve relevant junctions and links in the district, including Worksop, which for Peaks Hill Farm are identified in Policy 16. The Local Plan aligns jobs with housing. It is considered that this will promote self-containment which will have a positive impact on outward commuting benefitting the district including the town centres.
Representation Reference: REF027.2 Name: Resident	Refers to: POLICY 16: Site HS1: Peaks Hill Farm, Worksop	Legal compliance and soundness: Legal compliance of plan not specified. Plan is unsound. Compliance with Duty to Co-operate not specified.	Comments: The plan has not fully considered the transport issues that will be created if a huge volume of additional housing is developed in the area. Building over 1000 new houses on Peaks Hill will result in a massive increase in people commuting in and out of Worksop by road and rail. The employment opportunities in Worksop are very limited and this will remain the case even if new businesses are developed on Peaks Hill. There are huge pressures on Worksop's commuting infrastructure. If over 1000 new homes are built in Worksop it will result in a significant increase in the volume of people travelling by road and rail to visit other nearby Towns and Cities to shop and socialise, with only minimal benefit to the economy of	Suggested changes: Need to fully consider the impact on the wider community including the impact of increased traffic and increased demand on trains and other transport. Should clearly explain how it will address the commuter issues that will be created in Worksop if a huge	Officer comments: It is considered that the Bassetlaw Transport Study 2022, accepted by the Local Highways Authority appropriately considers the transport issues associated with Local Plan growth including from Peaks Hill Farm and identifies proportionate financial contributions to improve relevant junctions and links in the district, including

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			Worksop. Building a new road on Peaks Hill and a few new roundabouts in the area will not resolve the significant increased congestion issues that will be created on the main roads leading out of Worksop.	volume of additional housing is developed.	Worksop, which for Peaks Hill Farm are identified in Policy 16. The Local Plan aligns jobs with housing. It is considered that this will promote self-containment which will have a positive impact on outward commuting benefitting the district including the town centres.
Representation Reference: REF040.7 Name: McLoughlin Planning on behalf of land owner	Refers to: Policy 16 HS1 Peaks Hill Farm	Legal compliance and soundness: Legal compliance and compliance with Duty to Cooperate not indicated.	Comments: Concern about deliverability are reinforced in policy HS1 that advises that the Council has not yet received a supporting framework outlining an infrastructure strategy to ensure the deliverability of the site. This raises doubts on delivery (i.e. any unknown constraints which may reduce unit numbers for example) and whether the development site is realistic over the lifetime of the plan in conflict with NPPF paragraph 22. Highlight a concern of the methodology and number of homes proposed for allocation which are located on very large sites (garden village) and the high number proposed through existing planning permissions and windfall development. Encourage the Council to re-explore the allocation of medium sites in sustainable locations (like Worksop) to dilute the risk across multiple allocations which have provided evidence of being deliverable and realistic (e.g. preferred option LAA206). This has the potential of offering	Suggested changes: <ul style="list-style-type: none"> • should bring forward site LAA206 (preferred option) on the edge of Worksop as an allocation to reduce the risk of future under delivery of policy HS15. This site is deliverable and has a reliable housing developer ready to bring the site forward. • amend the planning policy map to address the issues associated with emerging Local 	Officer comments: It is considered Infrastructure Delivery Plan, informed by infrastructure partners views, appropriately provides for infrastructure required to support Peaks Hill Farm. The Whole Plan Viability Assessment 2022 confirms this can be secured as part of a financially viable scheme. The infrastructure strategy is required to accompany each stage of the planning application to demonstrate compliance with Policy 16.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>a greater long term sustainable housing delivery trajectory versus the current methodology adopted. Happy to discuss bringing the land north of Mansfield Road, Worksop forward.</p>	<p>Plan policies GG4 and ST38.</p>	<p>The May 2022 Second Addendum included an updated housing land supply position, showing at 31 March 2022 a 17% buffer in the supply. This provides for a contingency against non-delivery. The Housing Supply, Trajectory and Windfall Allowance Background Paper May 2022 clarifies the approach to delivery. It is considered the Sustainability Appraisal, Land Availability Assessment and Site Selection Methodology are consistent with national policy and provide a robust basis to determine the most sustainable sites to meet the identified housing requirement. All reasonable alternatives have been appropriately considered through the Sustainability Appraisal which has informed the Site Selection process. It is</p>

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
					considered that the Green Gap Study appropriately evidences the identification of green gap GG4.
Representation Reference: REF051.1 Name: Resident	Refers to: Policy 16 HS1 Peaks Hill Farm Point (g	Legal compliance and soundness: Plan is not legally compliant and is unsound. Plan does not comply with the Duty to Cooperate.	Comments: The proposed development will have a negative impact on the local environment. It will destroy the habitat of roe deer, buzzard and numerous other wildlife and birds who live in the woods that will be cut down to make the 'new' link road from Blyth road to Carlton road. Trees should be protected not chopped down.	Suggested changes: Rethink where you are proposing to build. Use more brownfield sites instead of using good farm land.	Officer comments: Policy 16 seeks to protect the woodland on site from development. Where trees must be lost compensatory provision is required. 10% biodiversity net gain is required on site.
Representation Reference: REF051.4 Name: Resident	Refers to: Policy 16 HS1 Peaks Hill Farm Point (j	Legal compliance and soundness: Plan does not comply legally and is unsound. Plan does not comply with the Duty to Cooperate	Comments: Doctors, dentists and health centres are already over-loaded. The hospital is busy and cannot cope with much more.	Suggested changes: Rethink where you are proposing to build. Use more brownfield sites instead of using good farm land.	Officer comments: It is considered the Local Plan and the IDP, informed by infrastructure partners views, appropriately provides for infrastructure required to support Local Plan growth, including for health care.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Representation Reference: REF051.5 Name: Resident	Refers to: Policy 16 HS1 Peaks Hill Farm – Point h)	Legal compliance and soundness: Plan does not comply legally and is unsound. Plan does not comply with the Duty to Cooperate	Comments: Schools are already full. Parents are struggling to get their children into secondary schools. Building more houses will make this worse. These are not definite plans to build more schools.	Suggested changes: Rethink where you are proposing to build. Use more brownfield sites instead of using good farm land.	Officer comments: It is considered the Local Plan and the IDP, informed by infrastructure partners views, appropriately provides for infrastructure required to support Local Plan growth, including for education.
Representation Reference: REF051.6 Name: Resident	Refers to: Policy 16 HS1 Peaks Hill Farm – Point (l	Legal compliance and soundness: Plan does not comply legally and is unsound. Plan does not comply with the Duty to Cooperate.	Comments: It will have a negative impact on local transport. The roads leading to the A1 and M1 are only country lanes which are already very busy. The A57 has already seen an increase of traffic because of the building of houses at Gateford and Shireoaks. These roads pass through villages (Blyth and Anston) which will continue to be bottle necks.	Suggested changes: Rethink where you are proposing to build. Use more brownfield sites instead of using good farm land.	Officer comments: It is considered that the Bassetlaw Transport Study 2022, accepted by the Local Highways Authority appropriately considers the transport issues associated with Local Plan growth including from Peaks Hill Farm and identifies proportionate financial contributions to improve relevant junctions and links in the district, including Worksop, which for Peaks Hill Farm are identified in Policy 16. It is considered the Local Plan and the IDP,

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
					informed by infrastructure partners views, appropriately provides for infrastructure required to support Local Plan growth, including for transport.
Representation Reference: REF048.4 Name: Nottinghamshire County Council	Refers to: Policy 16 Peaks Hill Farm	Legal compliance and soundness: Plan is unsound.	Comments: Local roads within Worksop have not received the same level of scrutiny as at Retford. The large Worksop allocations at Peaks Hill Farm and Apleyhead are likely to have a material traffic impact on local junctions. The scope and possibility of mitigation has yet to be established. The County Council as highway and transport authority is unable to support the Peaks Hill Farm and Apleyhead until this is addressed, and which should consider the implications of the proposed Garden Village. Policy HS1 (and other sites in Worksop) do not include any requirement for this development to contribute to A57 junction improvements, despite the Bassetlaw Transport Study indicating that it is one of a number of allocated sites which will contribute to junctions being over stressed. This should be addressed. The County Council offers to work with Bassetlaw District Council to develop an agreed improvement plan and mechanism under which larger sites make a proportionate and justified contribution towards the A57 Corridor /junction improvements and other strategic transport improvements as set out in the BTS. These would be pooled, potentially through S106 mechanisms. The A57 Corridor is to be included in a	Suggested changes: <ul style="list-style-type: none"> • A mechanism should be identified in the Local Plan to ensure that relevant sites in Worksop, including HS1 contribute to A57 improvements if it is proposed that no CIL be collected from all allocated sites. • Policies should include a restriction on development until the improvement mechanism has been secured. • Policy HS1 Part 2.1) A marked cycle lane may not be appropriate to 	Officer comments: The Bassetlaw Transport Study 2022, accepted by the Local Highways Authority has identified the traffic impact of relevant Local Plan site allocations on the road network and proportionate contribution towards mitigation including to address impacts upon the A57. The A57 Improvement Plan is a longer-term plan that will look at wider improvements to the link between the M1 and A1 in consultation with other relevant partners. The work programme and timetable has been agreed with NCC and partners. The May 2022 Second

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>Strategic Infrastructure Plan prepared by the County Council. The County Council and Bassetlaw should jointly seek to secure other sources of funding during the Plan period to enable the delivery of these improvements. This will help fulfil the recommendations of the Bassetlaw Transport Study if a zero CIL rate is agreed. This will help resolve this objection.</p>	<p>accord with DfT LTN1/20. It would be required on both sides of the carriageway to serve both directions. As a minimum, a stepped cycle track should be provided where adjacent a carriageway.</p> <ul style="list-style-type: none"> • Policy HS1 Part 2.iii). should include connections for all modes where possible (vehicular traffic) including to Carlton Forest Industrial Estate. • Part 2.vii) improvements should be secured by condition, agreement, or obligation as 	<p>Addendum withdraws the Garden Village from the Local Plan. A draft Workstop Transport Assessment has now been produced to support the Workstop Central DPD. It is considered that the detailed matters identified in relation to Policy 16 and Policy ST54 have been addressed by the January 2022 Addendum.</p>

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
				necessary if not to be funded by CIL.	
Representation Reference: NRF-REF002.1 Name: Residents	Refers to: Policy 16 Peaks Hill Farm	Legal compliance and soundness: Not specified as representation was not submitted on a Regulation 19 Form.	Comments: Want to see: 1. A green buffer zone between current homes on Westerdale and any new development. Preferably building behind 'Long Plantation' or a minimum 15 metres from the existing housing on Westerdale, to maintain a green corridor for privacy and wildlife 2. New dwellings to have gardens that back onto the 'buffer zone' to increase the distance between existing homes and new houses and to extend the green corridor 3. Any communal areas, such as youth facilities, playgroups, car parks and sports pitches, to be located away from any existing homes in the centre of the new development behind the treeline 4. Minimal street lighting across the estate to minimise light pollution 5. Low level housing near to any existing homes, such as bungalows, not higher-rise townhouses 6. Green pathways and corridors across all the development to connect existing woodlands, new cycle routes, walking routes to enable access to public transport 7. Maximise tree/shrub planting, open spaces, verges etc to create a more attractive environment to overlook 8. Build enough housing that local people can actually afford and cater for an increasingly elderly population 9. Decent sized gardens for dwellings	Suggested changes: 1. A green buffer zone between current homes on Westerdale and any new development. Preferably building behind 'Long Plantation' or a minimum 15 m from the housing on Westerdale, to maintain a green corridor for privacy and wildlife 2. New dwellings to have gardens that back onto the 'buffer zone' to increase the distance between existing homes and new houses and to extend the green corridor 3. Any communal areas to be located	Officer comments: Policy 16 requires a green buffer along the southern boundary of the site. Should the site be allocated in the Plan a planning application will be considered. This will provide residents will an opportunity to comment on the masterplan and the location of different uses on the site, and details like boundary treatments.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
				<p>away from any existing homes in the centre of the new development behind the treeline</p> <p>4. Minimal street lighting across the estate to minimise light pollution.</p> <p>5. Low level housing near to any existing homes, such as bungalows, not higher-rise townhouses.</p> <p>6. Green pathways and corridors across all the development to connect existing woodlands, new cycle routes, walking routes to enable access to public transport.</p> <p>7. Maximise tree/shrub planting, open spaces, verges.</p> <p>8. housing that local people can afford and cater for an</p>	

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
				increasingly elderly population with bungalows and smaller dwellings 9. Decent sized gardens for dwellings so people can benefit from outdoor space;	
Representation Reference: NRF-REF004.1 Name: Resident	Refers to: Policy 16 Peaks Hill Farm	Legal compliance and soundness: Not specified as representation was not submitted on a Regulation 19 Form.	Comments: Re-confirm previous objections. Very concerned that the green buffer will be in place prior to the building work starting, to limit disruption and noise given that multiple builders will be building on the land but to create a safe place for the wildlife during the building works. If you're planting trees they will take years to create the sort of boundary that we would hope to be in place. Read online it took two hours for ambulance to arrive from Newark to support someone having a heart attack. Concerned about the impact on services. A couple of weeks ago had a first aid course ran by two paramedics. They said they would bypass Bassetlaw hospital even if it was just for a splinter! This is really concerning for someone who is pregnant.	Suggested changes: Require a green buffer to be developed adjacent to existing homes before any new homes are built	Officer comments: Policy 16 requires a green buffer along the southern boundary of the site. Should the site be allocated in the Plan a planning application will be considered. This will provide residents will an opportunity to comment on the masterplan and the location of different uses on the site, and details like boundary treatments. Part 2j requires a financial contribution be sought towards improving local healthcare facilities and to mitigate impacts at Bassetlaw Hospital.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Representation Reference: NRF-REF004.2 Name: Resident	Refers to: Policy 16 Peaks Hill Farm	Legal compliance and soundness: Not specified as representation was not submitted on a Regulation 19 Form.	Comments: Would like to see: A green buffer zone between current homes on Westerdale; New dwellings to have gardens that back onto the 'buffer zone'; Any communal areas, such as youth facilities, playgroups, car parks and sports pitches, to be located away from any existing homes; New dwellings to have minimum car-parking space to discourage multiple car ownership; Minimal street lighting across the estate to minimise light pollution; Low level housing near to any existing homes, such as bungalows, not higher-rise town houses; Green pathways and corridors across all the development; Maximise tree/shrub planting, open spaces, verges; Cater for an increasingly elderly population with bungalows and smaller dwellings; Decent sized gardens for dwellings so people can benefit from outdoor space;	Suggested changes: 1. A green buffer zone between homes on Westerdale and new development. Preferably building behind 'Long Plantation' or a minimum 15 m from the housing on Westerdale, to maintain a green corridor for privacy and wildlife 2. New dwellings to have gardens that back onto the 'buffer zone' to increase the distance between existing homes and new houses and to extend the green corridor 3. Any communal areas to be located away from any existing homes in the centre of the new	Officer comments: Policy 16 requires a green buffer along the southern boundary of the site. Should the site be allocated in the Plan a planning application will be considered. This will provide residents will an opportunity to comment on the masterplan and the location of different uses on the site, and details like boundary treatments.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
				<p>development behind the treeline</p> <p>4. New dwellings to have minimum car-parking space to discourage multiple car ownership to reduce noise, traffic and pollution.</p> <p>5. Minimal street lighting across the estate to minimise light pollution</p> <p>6. Low level housing near to any existing homes, such as bungalows, not higher-rise town houses</p> <p>7. Green pathways and corridors across the development to connect existing woodlands, new cycle routes, walking routes to enable access to public transport</p>	

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
				<p>8. Maximise tree/shrub planting, open spaces, verges etc to create a more attractive environment to overlook</p> <p>9. Cater for an increasingly elderly population with bungalows and smaller dwellings</p> <p>10. Decent sized gardens for dwellings so people can benefit from outdoor space;</p>	
<p>Representation Reference: NRF-REF004.3</p> <p>Name: Resident</p>	<p>Refers to: Policy 16: HS1 Peaks Hill Farm</p>	<p>Legal compliance and soundness: Not specified.</p>	<p>Comments: Objects to the site due to: wildlife in the woodland area - buzzards, owls, bats, foxes and hedgehogs; issues with drainage and future flooding; issues with privacy; Infrastructure on surrounding roads; Broadband issues; Safety concerns; Lack of employment; Lack of capacity at the doctors and dentist; Provision of elderly care; School capacity; Public consultation process.</p>	<p>Suggested Changes: None suggested.</p>	<p>Officer Comments: Policy 16 seeks to protect the woodland on site from development. Where trees must be lost compensatory provision is required. 10% biodiversity net gain is required on site. It is considered Policy 16, informed by infrastructure partners views, appropriately provides for</p>

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
					infrastructure required to support Peaks Hill Farm, including for education, health and transport. Peaks Hill Farm will make provision for 10ha of employment land and for older peoples housing. The Consultation Statement shows that all Local Plan consultations have been undertaken in accordance with, and have exceeded the requirements of the Local Planning regulations and the Council's Statement of Community Involvement.
Representation Reference: NRF-REF020.1 Name: Resident	Refers to: Policy 16 HS1 Peaks Hill Farm and other greenfield sites	Legal compliance and soundness: Not specified	Comments: Object to the use of good fertile farmland. Worksop has not got the facilities for sustaining such large developments. There isn't the facilities, because there is a struggle to get to see a doctor at the limited surgeries we have. The hospital is getting degraded at every opportunity by whichever authority. Reiterate my STRONGEST OBJECTIONS TO PROPOSED DEVELOPMENTS, especially since you are going way beyond the government requirement for said housing	Suggested changes: Only allocate brownfield sites for development	Officer comments: The Local Plan promotes the use of brownfield land where possible, but there is not enough suitable available brownfield land to meet needs. It is considered Policy 16, informed by infrastructure partners views, appropriately provides for

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
					<p>infrastructure required to support Peaks Hill Farm, including for education, health and transport. National policy states that the standard method is a minimum starting point for assessing housing need. National policy states that the housing requirement figure can exceed that.</p>
<p>Representation Reference: NRF-REF023.1</p> <p>Name: Carlton Forest Partnership</p>	<p>Refers to: Policy 16 Peaks Hill Farm</p>	<p>Legal compliance and soundness: Not specified</p>	<p>Comments: The balance of the land comprising the housing and employment allocation is under the control of Hallam Land – with whom our client is working collaboratively to ensure the early and coordinated delivery of the site through the Local Plan process, and on the ground. The Council is aware that all evidence in the form of background surveys and reports required to inform any masterplan and planning application are underway to be able to demonstrate the early delivery of the scheme – and the landowner’s commitment to bringing forward a planning application at the earliest opportunity. It is expected that the first houses will appear on the site before the 2026 dated envisaged.</p>	<p>Suggested changes: No changes suggested</p>	<p>Officer comments: The May 2022 Second Addendum revisits the housing trajectory. However, it is considered that the delivery timescales identified in para 7.2.4 are broadly appropriate to inform the anticipated delivery of the site.</p>

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Representation Reference: REF021.3 Name: Sport England	Refers to: Policy 19: HS4 Former Manton Primary School	Legal compliance and soundness: Plan is legally compliant, sound and complies with the Duty to Cooperate.	Comments: The policy is supported. Especially the part about the protection of Playing field.	Suggested changes: None	Officer comments: Noted.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
<p>Representation Reference: REF048.12</p> <p>Name: Nottinghamshire County Council</p>	<p>Refers to: POLICY 20: Site HS5: Talbot Road, Worksop</p>	<p>Legal compliance and soundness: Not specified</p>	<p>Comments: Part 2.g) A Transport Statement will not be required for less than 50 units. Part 2.g)ii. Two footways will be required to serve both sides of the carriageway.</p>	<p>Suggested changes: Part 2g) remove the requirement for a Transport Statement. Add: Part 2.g)ii. Two footways will be required to serve both sides of the carriageway</p>	<p>Officer comments: It is acknowledged that the Local Highways Authority do not require a Transport Statement for schemes less than 50 dwellings and that the carriageway should be supported by footways on either side. It is considered that the following proposed suggested changes address the matters raised: 2g) all necessary transport infrastructure improvements through direct mitigation or contributions to new and improved infrastructure, referring to the development's Transport Statement, informed by Local Highways Advice, including: i. An appropriate link road between Talbot Road and Lincoln Road, to accommodate vehicles, cyclists and a footway either side to</p>

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
					<p>accommodate pedestrians;</p> <p>ii. A pedestrian footway connecting the site to the existing footway on Talbot Road and Lincoln Road</p>

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name: Representation Reference: REF016.2 Name: Network Rail	Refers to: POLICY 21: Site HS7: Trinity Farm, Retford	Legal compliance and soundness: Plan is legally compliant. Plan is sound. Plan complies with Duty to Co-operate.	Comments: Consider the policies and proposals in the Plan to be positively prepared, justified, effective and consistent with national policy. Pleased with the safeguards put in place in respect of level crossings relating specifically to the housing allocations at site HS7 (Trinity Farm)	Suggested changes: None	Officer comments: Noted.
Representation Reference: REF038.5 Name: Fisher German on behalf of land owner	Refers to: POLICY 21: Site HS7: Trinity Farm	Legal compliance and soundness: Legal compliance and soundness – not specified Compliance with Duty to Co-operate – not specified.	Comments: The developer’s masterplan confirms that the site can deliver in excess of the 244 dwellings proposed; it could deliver in excess of 297 dwellings at the same time as accommodating the additional requirements of emerging Policy 23.	Suggested changes: It is considered that the true quantum of housing should be expressed in the policy.	Officer comments: The January 2022 Addendum has increased the housing requirement in Policy 21 to 305 dwellings. This is considered to be an appropriate housing figure for this site.
Representation Reference: REF038.6 Name: Fisher German on behalf of land owner	Refers to: POLICY 21: Site HS7 Trinity Farm	Legal compliance and soundness: Legal compliance and soundness – not specified Compliance with Duty to Co-operate – not specified.	Comments: 2 D) The site adjoining approved residential development would clearly not be suitable for mineral extraction. As such the need for criterion D is questioned.	Suggested changes: Remove criterion D.	Officer comments: Criterion 2d) is required to ensure Policy 21 accords with the Nottinghamshire Minerals Local Plan Policy SP7 and the NPPF.

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Representation Reference: REF038.7 Name: Fisher German on behalf of land owner	Refers to: POLICY 21: Site HS7 Trinity Farm	Legal compliance and soundness: Legal compliance and soundness – not specified Compliance with Duty to Co-operate – not specified.	Comments: 2 E) In respect of the need for intrusive site investigations, this should be informed by the geophysical assessment and the results of the assessments for the land to the south.	Suggested changes: It is not sound for this to be required if better evidence produced by the applicant demonstrates that this is not necessary.	Officer comments: The Council’s Archaeology Adviser has identified potential for significant archaeology on the site. To accord with paragraph 190 of the NPPF, Policy 21 requires intrusive site investigations. This approach has also been agreed with Historic England.
Representation Reference: REF038.8 Name: Fisher German on behalf of land owner	Refers to: POLICY 21: Site HS7 Trinity Farm	Legal compliance and soundness: Legal compliance and soundness – not specified Compliance with Duty to Co-operate – not specified.	Comments: 2 F) any eventual housing mix will have due regard for adopted policy, evidence of local need at that time as well as local market signals to ensure any proposed scheme meets local needs and is viable. As per 7.8.5 of the Draft Plan, the possibility of providing a care home or other accommodation on site is being explored but cannot be required.	Suggested changes: Make the requirement of providing a care home on site optional rather than a requirement.	Officer comments: Paragraph 7.8.5 asks that a care home be considered as part of the housing mix, but Policy 21 does not require the provision of a care home.
Representation Reference: REF038.9 Name: Fisher German on behalf of land owner	Refers to: POLICY 21: Site HS7 Trinity Farm	Legal compliance and soundness: Legal compliance and soundness – not specified Compliance with Duty to Co-operate – not specified.	Comments: 2g)-l) Support the reduction in open space required from the previous Local Plan. Whilst only illustrative, Figure 2 demonstrates how a scheme could be advanced on the site delivering the specific site requirements of these policies. The design and implementation of the scheme will be informed by future ecology surveys. What justification is	Suggested changes: Remove the requirement of a community woodland.	Officer comments: The January 2022 Addendum removes the requirement from Policy 21 for a community woodland.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			there for Trinity Farm to deliver a community woodland?		
Representation Reference: REF038.10 Name: Fisher German on behalf of land owner	Refers to: POLICY 21: Site HS7 Trinity Farm	Legal compliance and soundness: Legal compliance and soundness – not specified Compliance with Duty to Co-operate – not specified.	Comments: 2K) Requirement for the specified highway improvements is unjustified. It would be best explored through a detailed planning application. It is not clear that the proposed development will need to make contributions to all the junctions listed, and this will likely depend on chronologically when the application is submitted and determined and what intervening development has occurred prior elsewhere. As written the policy essentially necessitates financial contributions to all the listed junctions. Consider this is not effective or justified (unsound).	Suggested changes: appropriate improvements to highways infrastructure in the locality of the site, this may include including an appropriate financial contribution towards: a. improvements to the junction at A620 Babworth Road / B6420 Mansfield Road / A620 Straight Mile / Sutton Lane; b. improvements to the junction at Ordsall Road/A620 Babworth Road; c. improvements to London Road / Whinney Moor Lane / Bracken Lane; d. improvements to London Road / Whitehouses Road.	Officer comments: The Bassetlaw Transport Study 2022, accepted by the Local Highways Authority and the Retford Transport Assessment identifies the individual and cumulative impact of Local Plan growth upon the highways network, and identifies proportionate and necessary contributions to relevant links and junctions. It is considered this provides a justified, robust baseline for the criteria in 2k). However to clarify the approach it is considered that a proposed suggested change to Policy 21 k) will address this matter: all necessary transport infrastructure improvements through direct mitigation or contributions to new and improved infrastructure, which shall include but not be limited to, the following schemes identified within the

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
					Infrastructure Delivery Plan, exact details to be identified as part of referring to the development's Transport Assessment and Travel Plan, and any future planning applications for the site informed by Local Highways Authority advice including:
Representation Reference: REF048.5 Name: Nottinghamshire County Council	Refers to: Policy 27: Ordsall South, Retford Policy 21 Trinity Farm, Retford	Legal compliance and soundness: Plan is legally compliant – not specified Plan is unsound Complies with the Duty to Cooperate – not specified.	Comments: The Transport Assessment assesses all proposed allocations in Retford. It is not possible to determine whether 244 dwellings at Trinity Farm, in the absence of Ordsall South, could be accommodated on the existing highway network without generating a material traffic impact on the A620 Amcott Way/ Bridlegate/A620 Hospital Road/A638 North Road/Hallcroft Road roundabout; A620 Amcott Way/ A620 Moorgate/A638 Arlington Way; A638 Arlington Way / Grove Street; and A638 Arlington Way/A638 London Road/Carolgate complex with no scope for physical improvement. NCC is unable to support the allocation.	Suggested changes: Part K should include reference to bus services. Part 2.k)iii should include a cycle track to connect to existing facilities to the south. Part 2.k)vii improvement should be preferably secured by condition.	Officer comments: The January 2022 Addendum amended Policy 21. It is considered these address the matters raised. It is considered that the Retford Transport Assessment 2022 appropriately demonstrates that the number of dwellings at Trinity Farm and Ordsall South individually and cumulatively with other development identified in the Plan can be accommodated on the highway network.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Representation Reference: REF048.13 Name: Nottinghamshire County Council	Refers to: POLICY 22: Site HS8: Milnercroft, Retford	Legal compliance and soundness: Not specified	Comments: Access doesn't appear sufficiently wide; would be seeking a width of 4.8m plus 0.5m clearance on both side for the first 8.0m from Leafield for a private drive serving up to 5 dwellings. Extra space required for a communal bin store at the back of the footway. Part 2.d) A Transport Statement will not be required for schemes less than 50 units.	Suggested changes: Ensure the access route is sufficiently wide enough to meet highway standards	Officer comments: It is considered that the following proposed suggested changes will address the matters raised: d) all necessary transport infrastructure improvements through direct mitigation or contributions to new and improved infrastructure, which shall include but not be limited to, the following schemes identified within the Infrastructure Delivery Plan, exact details to be identified as part of referring to the development's Transport Statement, informed by Local Highways Authority advice any future planning applications for the site including a safe access into the site from Leafield for

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
					<p>vehicles, cyclists and pedestrians:</p> <ul style="list-style-type: none"> i. an appropriate private drive from Leafield of at least 5.8m width to accommodate vehicles and cyclists; ii. a pedestrian footway connecting the site to the existing footway on Leafield. This should provide for appropriate space at the rear of the footway to accommodate communal bin storage. <p>It is considered that a proposed suggested change be sought to the Policies Map and Figure 20 to show an access of 5.8m for a private drive within the red line site boundary.</p>
Representation Reference:	Refers to:	Legal compliance and soundness:	Comments: The plan states that only one plot is currently being rented. Only aware of one	Suggested changes: Clarify location of the development.	Officer comments: The Council's Open Space Assessment Update 2020

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
NRF-REF025.1 Name: Resident	POLICY 22: Site HS8 Milnercroft, Retford	Not specified	set of allotments on Milnercroft and this plot is very much in use and provides social interaction, physical and mental exercise for local residents, most of whom are retired. The amount of plots rented should be checked and the location of the proposed development clarified.	Check the number of allotments in use on the site.	identifies the site as low value/low quality. The Council's allotment holder records identify only one plot in formal use. Policy 22 2b) states that active allotment space will be re-provided before development commences to ensure no loss of active provision. The layout of the development will be dealt with through the planning application process.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Representation Reference: REF048.14 Name: Nottinghamshire County Council	Refers to: POLICY 23: Site HS9: Former Elizabethan High School	Legal compliance and soundness: Not specified	Comments: Part g) iv. The technical specification and improvements listed and referenced in the IDP are subject to agreement with the Highway Authority. The site will be subject to developer contributions towards highway improvements from those developments that have a material traffic impact with the improvements secured preferably by condition, but through pooled contributions where necessary. A proportionate highway infrastructure cost contribution towards public transport to be provided by the larger sites, and from which this site would benefit, may be more appropriate.	Suggested changes: A proportionate highway infrastructure cost contribution put towards public transport to be provided by the larger sites, and from which this site would benefit, may be more appropriate.	Officer comments: It is considered that a proposed change to Policy 23 2giii) will address this matter: replace appropriate highway demand management measures to be in operation throughout the lifetime of the construction of the site; with an appropriate financial contribution towards enhancing bus service provision in the locality;

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Representation Reference: REF048.15 Name: Nottinghamshire County Council	Refers to: POLICY 24: Site HS10: St Michael's View, Retford (20 apartments)	Legal compliance and soundness: Not specified	Comments: Part 2.g) A Transport Statement will not be required <50 units. Part 2.g)iii. The technical specification and improvements listed and referenced in the IDP are subject to agreement with the Highway Authority. The site will be subject to developer contributions towards highway improvements from those developments that have a material traffic impact with the improvements secured preferably by condition, but through pooled contributions where necessary. A proportionate highway infrastructure cost contribution put towards public transport to be provided by the larger sites, and from which this site would benefit, may be more appropriate.	Suggested changes: Part 2.g) Remove the requirement for a Transport Statement	Officer comments: It is considered that the following proposed changes to Policy 24 will address the matters raised: 2g: all necessary transport infrastructure improvements through direct mitigation or contributions to new and improved infrastructure, which shall include but not be limited to, the following schemes identified within the Infrastructure Delivery Plan, exact details to be identified as part of referring to the development's Transport Statement, any future planning applications for the site informed by Local Highways Authority advice: 2gii) replace appropriate highway demand management measures to be in operation throughout the lifetime of the construction of the site; with an appropriate financial contribution

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
					towards enhancing bus service provision in the locality;

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name: Representation Reference: REF016.3 Name: Network Rail	Refers to: POLICY 25: Site HS11 Fairygrove, Retford	Legal compliance and soundness: Plan is legally compliant. Plan is sound. Plan complies with Duty to Co-operate.	Comments: Support the policies and proposals put forward in the Plan; consider them (in the context of policies and proposals that affect our infrastructure) to be positively prepared, justified, effective and consistent with national policy. Pleased with the safeguards put in place in respect of level crossings relating specifically to the housing allocations at site HS11.	Suggested changes: N/A	Officer comments: Noted.
Representation Reference: REF048.16 Name: Nottinghamshire County Council	Refers to: POLICY 25: Site HS11 Fairygrove, Retford (61 dwellings)	Legal compliance and soundness: Not specified	Comments: Part 2.g) A Transport Statement would be required >50 and <80 dwellings. A Travel Plan will not be required. Part 2.g)ii. The Highway Authority is likely to seek two points of access. Manual for Streets (MfS) promotes networks of streets that provide permeability and connectivity to main destinations with a choice of routes to ensure that new developments enhance the existing movement framework of an area rather than disrupting or severing it. MfS suggests that internal permeability is important but that the area also needs to be properly connected with adjacent street networks because developments with poor links to the surrounding area create enclaves which encourage movement to and from them by car rather than by other modes. MfS recommends that pedestrians and	Suggested changes: Change one point of access to two points of access: g)i one two points of safe access from Grove Road for vehicles, cyclists and pedestrians. Access should be located at least 150m from the level crossing on Grove Road	Officer comments: It is considered that the following proposed suggested changes will address the matters raised: 2g: all necessary transport infrastructure improvements through direct mitigation or contributions to new and improved infrastructure, which shall include but not be limited to, the following schemes identified within the Infrastructure Delivery Plan, exact details to be identified as part of referring to the development's Transport

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>cyclists should share streets with motor traffic as this generally provides a more secure environment than connecting pathways as streets can more easily be designed to be overlooked with active frontages. Connected or permeable networks lead to a more even spread of motor traffic through an area and so avoid the need for distributor roads with no frontage development. The avoidance of cul-de-sacs reduces the concentration of traffic on a smaller number of dwellings, negates the need for turning heads which are wasteful in land terms and lead to additional vehicle travel and emissions, particularly by service vehicles. Part 2.g)vi. The technical specification and improvements listed and referenced in the IDP are subject to agreement with the Highway Authority. The site will be subject to developer contributions towards highway improvements from those developments that have a material traffic impact with the improvements secured preferably by condition, but through pooled contributions where necessary. A proportionate highway infrastructure cost contribution put towards public transport to be provided by the larger sites, and from which this site would benefit, may be more appropriate.</p>		<p>Statement and Travel Plan, and any future planning applications for the site informed by Local Highways Authority advice: 2gi) one two points of safe access from Grove Road for vehicles, cyclists and pedestrians. Access should be located at least 150m from the level crossing on Grove Road. It is considered that public transport contributions are appropriately covered by 2giii).</p>

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
<p>Representation Reference: REF048.17</p> <p>Name: Nottinghamshire County Council</p>	<p>Refers to: POLICY 26: Site HS12: Station Road, Retford</p>	<p>Legal compliance and soundness: Not specified</p>	<p>Comments: Part 3.a) (after 2b?) A Transport Statement will not be required <50 units.</p>	<p>Suggested changes: Remove the requirement for a transport statement</p>	<p>Officer comments: It is acknowledged that the Local Highways Authority does not require a Transport Statement for sites of less than 50 dwellings. It is considered that the following proposed suggested change address the matter raised to new criterion 2c): all necessary transport infrastructure improvements through direct mitigation or contributions to new and improved infrastructure, referring to the development's Transport Statement, informed by Local Highways Authority advice, detailing a safe access into the site from Victoria Road for vehicles, cyclists and pedestrians;</p>

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name: Representation Reference: 1913922.1 Name: Resident	Refers to: POLICY 27: Site HS13: Ordsall South	Legal compliance and soundness: Plan is not legally compliant. Plan is unsound. Plan complies with Duty to Co-operate	Comments: The site would hugely extend the town boundary south and west. Against government 'green' plan. Ignores need for large road development. Creates traffic danger and infrastructure overwork.	Suggested changes: Reduction in size of Ordsall south to reduce environmental damage to a green area and traffic density. Current road system already unfit for purpose in various areas. Access to A1 totally inadequate under current proposals.	Officer comments: The January 2022 Addendum amended Policy 27 relating to Ordsall South; this is considered to provide an appropriate policy framework to ensure the housing requirement is delivered with appropriate supporting infrastructure, manages environmental impact and provides relevant mitigation off-site to address potential impacts identified by the evidence, including for transport.
Representation Reference: 1942532.1 Name: Resident	Refers to: POLICY 27: Site HS13: Ordsall South	Legal compliance and soundness: Plan is legally compliant. Plan is unsound. Plan complies with Duty to Co-operate.	Comments: No thought given to schoolchildren crossing Babworth Road at the junction with Ordsall road. The "safe islands" shown are uncontrolled islands. This will hold up traffic for children to cross and will be a safety issue. The new bus stop will affect traffic as it is close to the junction. A set of traffic lights will not ease congestion at this junction.	Suggested changes: None	Officer comments: The Bassetlaw Transport Study 2022, accepted by the Local Highways Authority, and the Retford Transport Assessment have assessed the impact of traffic on the existing road network from the proposed allocation. It is considered that this provides an appropriate evidence base to identify the transport

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
					requirements, including improvements to junctions and links in the locality from this site, as well as a proportionate split per allocation in terms of the traffic impact and the contribution towards the identified mitigation. The Local Plan including Policy 27 also promotes a shift towards more sustainable transport such as bus services, walking and cycling to help minimise the impact from cars upon the road network.
Representation Reference: 1945106.1 Name: BDC and County Councillor	Refers to: Policy 27: Site HS13 Ordsall South point I) – School provision on site	Legal compliance and soundness: Plan is not legally compliant, sound or complies with Duty to Cooperate.	Comments: At public consultations it has been repeatedly stated that a Primary School is agreed with Nottinghamshire County Council. This is incorrect. The Members of Bassetlaw District Council have been advised of the agreement for a school. This is incorrect and has been demonstrably proven to the Chief Executive of BDC on 19/10/21. Have no issue with development. Need more houses but with appropriate infrastructure. It would be better to pick an area and provide	Suggested changes: Bassetlaw Garden Village is planned for an additional 3,000 plus homes post 2037. Why not reduce the developments elsewhere and build 4,000 to 2037. Would attract more positive funding from government and developers due to the scale. The current plan to build 500 homes to 2037 is insufficiently large to make	Officer comments: To inform public consultations, officers of the County Council, acting within their delegated powers, had made clear in written responses to BDC that Ordsall South as proposed would generate sufficient demand to sustain a primary school. At no point in these discussions had NCC Officers suggested that

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			4,000 homes with the correct infrastructure as well as transport and retail provision. It is also adjacent to the east-west rail line and as such could become a significant environmentally friendly new town in its own right similar to Cambourne, Cambridgeshire or Buckshaw Village, Lancashire.	it economically viable given its location. Even Ordsall South would benefit from being larger with the correct infrastructure rather than 1,250 with no infrastructure or the 'promise' of potential infrastructure.	there was any likelihood that the County Council would oppose the provision of a school. On that basis, it was reasonable for BDC Officers to set out this position at public meetings. This was confirmed by NCC in their representations. The May 2022 Second Addendum withdraws the Garden Village from the Local Plan.
Representation Reference: 1945106.4 Name: BDC and County Councillor	Refers to: Policy 27: HS13 Ordsall South Section n) through p) – Transport and Connectivity requirements	Legal compliance and soundness: Plan is not legally compliant, sound or complies with Duty to Cooperate.	Comments: There needs to be an access road to London Road to prevent dangerous traffic situations in Ordsall and Eaton villages. The cycle path suggestions are incongruous to safe road use, in many cases such as Brecks Rd, West Hill Rd and Ordsall Rd to A620, the roads are not wide enough to facilitate a cycle lane. Any cycle lanes would impact residential parking which then creates a potential hazard. Have no issue with development. Need more houses but with appropriate infrastructure. It would be better to pick an area and provide 4,000 homes with the correct infrastructure as well as transport and	Suggested changes: Bassetlaw Garden Village is planned for an additional 3,000 plus homes post 2037. Why not reduce the developments elsewhere and build 4,000 to 2037. It would attract more positive funding from government and also developers due to the scale. The plan to build 500 homes to 2037 is insufficiently large to make it economically viable given its location.	Officer comments: The Bassetlaw Transport Study 2022, accepted by the Local Highways Authority, and the Retford Transport Assessment have assessed the impact of traffic on the existing road network from the proposed allocation. The Local Plan including Policy 27 also promotes a shift towards more sustainable transport such as bus services, walking and cycling to help minimise the impact from cars upon the road network. It is

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			retail provision. It is also adjacent to the east-west rail line and as such could become a significant environmentally friendly new town in its own right similar to Cambourne, Cambridgeshire or Buckshaw Village, Lancashire.		considered that this provides an appropriate evidence base and approach to identify the necessary transport requirements, including improvements to junctions and links in the locality from this site, as well as a proportionate split per allocation in terms of the traffic impact and the contribution towards the identified mitigation. The May 2022 Second Addendum withdraws the Garden Village from the Local Plan.
Representation Reference: 1945106.5 Name: BDC and County Councillor	Refers to: Policy 27: HS13 Ordsall South point p) subsection e. and iv. – Proposed developer contributions	Legal compliance and soundness: Plan is not legally compliant, sound or complies with Duty to Cooperate.	Comments: There is insufficient consideration of what the developer contributions should be used for. Many of the smaller developments will attract little or zero developer contributions. Have no issue with development. Need more houses but with appropriate infrastructure. It would be better to pick an area and provide 4,000 homes with the correct infrastructure as well as transport and retail provision. It is also adjacent to the east-west rail line	Suggested changes: Bassetlaw Garden Village is planned for an additional 3,000 plus homes post 2037. Why not reduce the developments elsewhere and build 4,000 to 2037. It would attract more positive funding from government and also developers due to the scale. The plan to build 500 homes to 2037 is	Officer comments: The January 2022 Addendum amended Policy 27 relating to Ordsall South; this is considered to provide an appropriate policy framework to ensure the housing requirement is delivered with appropriate supporting infrastructure, manages environmental impact and provides relevant mitigation off-site

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			and as such could become a significant environmentally friendly new town in its own right similar to Cambourne, Cambridgeshire or Buckshaw Village, Lancashire.	insufficiently large to make it economically viable given its location.	to address potential impacts identified by the evidence. Developer contributions can only be used to mitigate the impacts from a development. Smaller developments (under 50 units) which may not generate as many developer contributions will be CIL liable. The May 2022 Second Addendum withdraws the Garden Village from the Local Plan.
Representation Reference: 1945119.2 Name: The Woodland Trust	Refers to: Policy 27: Site HS13: Ordsall South, Retford	Legal compliance and soundness: Legal compliance of plan - not specified. Plan is unsound. Compliance with Duty to Co-operate - not specified.	Comments: Ordsall South is near to a notable oak tree (ATI number: 186338) so may have some limited impact on veteran or notable trees, which are recorded on the Woodland Trust's Ancient Tree Inventory. Reconsider this allocation, otherwise it could make the plan unsound by breaching NPPF and your local plan policy on ancient/veteran tree protection.	Suggested changes: If the allocation goes ahead, would like to see adequate buffering put in place to protect the affected trees from likely adverse impacts from the development. Appropriate buffering can be found in the Woodland Trust's Planners Manual on Ancient Woodland and Veteran Trees.	Officer comments: It is considered that adequate buffering can be incorporated into the masterplan for the site to ensure that there is no adverse impact from development upon the identified notable oak tree. It is considered that a proposed suggested change to Policy 27 f (new criterion ii) will address the matter as follows: the protection of notable oak tree (ATI number: 186338)

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
					in accordance with Policy 41, informed by a suitable compensation strategy
Representation Reference: 1945371.3 Name: Bassetlaw Conservative Councillor Group	Refers to: Policy 27: Site HS13 Ordsall South point I) – School provision on site	Legal compliance and soundness: Plan is not legally compliant, sound or complies with Duty to Cooperate.	Comments: The plan to build a school has NOT been agreed with Nottinghamshire County Council. The development of any school will need to be paid for from developer contributions of more than £4.9m	Suggested changes: The local plan should be developed in a strong partnership with Nottinghamshire County Council where infrastructure can be planned together between district and county. Need to plan for better roads, schools, health services and all support services through partnership.	Officer comments: Officers of the County Council, acting within their delegated powers, had made clear in written responses to BDC that Ordsall South as proposed would generate sufficient demand to sustain a primary school. At no point in these discussions had NCC Officers suggested that there was any likelihood that the County Council would oppose the provision of a school. This was confirmed by NCC in their representations. The IDP 2022 confirms that the development of a school at Ordsall South would be delivered through developer contributions. Agree that the local plan should be developed in a strong partnership with NCC to ensure infrastructure is planned

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name:					comprehensively to benefit Bassetlaw's communities.
Representation Reference: 1945371.6 Name: Bassetlaw Conservative Councillor Group	Refers to: Policy 27: Site HS13 Ordsall South, Retford	Legal compliance and soundness: Plan is not legally compliant, sound or complies with Duty to Cooperate.	Comments: Residents of the planned major developments in Retford for 1,250 houses are strongly opposed to the plans and support them. These developments should be stopped.	Suggested changes: These developments should be stopped and taken out of the local plan.	Officer comments: Noted.
Representation Reference: 1946117.2 Name: Resident	Refers to: Policy 27: Site HS13: Ordsall South, Retford	Legal compliance and soundness: Legal compliance of plan - not specified Plan is unsound. Plan does not comply with Duty to Co-operate.	Comments: Inadequate preparation has been made to accommodate a minimum 2,000 extra cars that will travel from Ordsall to Retford. Evidence of future traffic flows, and related subjects, needs to be provided before the Ordsall proposal is agreed. Insufficient evidence about schools and medical facilities in the Plan. No consideration to how Ordsall development will impact on Retford Town Centre. It could revive shopping opportunities but adequate parking facilities, the impact on the environment and changes to routes into the town must be addressed. Public views on the housing allocations in Ordsall have not been taken into account.	Suggested changes: In favour of the Green Village. It is strange that no consideration given to defining the Ordsall development as a similar village. Such a designation would have changed the proposed housing estate into a village with an identity.	Officer comments: The Bassetlaw Transport Study 2022, accepted by the Local Highways Authority, and the Retford Transport Assessment have assessed the impact of traffic on the existing road network from the proposed allocation. It is considered that this provides an appropriate evidence base and approach to identify the transport requirements, including improvements to junctions and links in the locality from this site, as well as a proportionate split per allocation in terms

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
					<p>of the traffic impact and the contribution towards the identified mitigation. The Local Plan including Policy 27 also promotes a shift towards more sustainable transport such as bus services, walking and cycling to help minimise the impact from cars upon the road network. The January 2022 Addendum amended Policy 27 relating to Ordsall South; this is considered to provide an appropriate policy framework to ensure the housing requirement is delivered with appropriate supporting infrastructure, including a new primary school, day care nursery and health hub, manages environmental impact and provides relevant mitigation off-site to address potential impacts identified by the evidence. The Consultation Statement shows that all Local Plan consultations</p>

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
					have been undertaken in accordance with, and have exceeded the requirements of the Local Planning regulations and the Council's Statement of Community Involvement.
Representation Reference: 1946689.2 Name: BDC Cllr	Refers to: Paragraph 7.14.15	Legal compliance and soundness: Legal compliance of plan - not specified. Plan is unsound. Compliance with Duty to Co-operate - not specified.	Comments: A new primary school has not been agreed or guaranteed by the county council. With 1,250 dwellings planned, this is a lot of extra demand for school places. Policy 27 says there will be provision of serviced land for a primary school. This does not guarantee it will happen. 1250 homes will lead to increase in traffic; Improved cycle and walking routes and a bus route will help and improvements made to highway infrastructure in the locality. Further details would be useful on how existing issues will be addressed e.g. parts of Ordsall subject to heavy flooding, making it almost inaccessible via Whitehouses, causing traffic to back up on London Road and at the Babworth Junction.	Suggested changes: The plan needs modifying to give more consideration to local infrastructure needs, particularly with regards to Policy HS13, which will impact on all of Retford. Greater transparency is required with regards to the school in HS13. It is believed that a school is part of the plan, but provision for land is not the same thing. Could some of the dwellings planned at sites such as Ordsall be accommodated in the proposed Garden Village?	Officer comments: Officers of the County Council, acting within their delegated powers, had made clear in written responses to BDC that Ordsall South as proposed would generate sufficient demand to sustain a primary school. At no point in these discussions had NCC Officers suggested that there was any likelihood that the County Council would oppose the provision of a school. This was confirmed by NCC in their representations. It is acknowledged that the development of a school at Ordsall South would be delivered through developer contributions. The Bassetlaw Transport

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
					<p>Study 2022, accepted by the Local Highways Authority, and the Retford Transport Assessment have assessed the impact of traffic on the existing road network from the proposed allocation. It is considered that this provides an appropriate evidence base to identify the transport requirements, including improvements to junctions and links in the locality from this site, as well as a proportionate split per allocation in terms of the traffic impact and the contribution towards the identified mitigation. The Local Plan including Policy 27 also promotes a shift towards more sustainable transport such as bus services, walking and cycling to help minimise the impact from cars upon the road network.</p>

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name: Representation Reference: 1946689.3 Name: BDC Cllr	Refers to: Paragraphs 7.14.13 and 7.14.14	Legal compliance and soundness: Legal compliance of plan - not specified. Plan is unsound. Compliance with Duty to Co-operate - not specified.	Comments: Flooding is an issue in Retford, with Ordsall suffering. The River Idle is in close proximity and 7.14.14 talks about surface water ponding on site. It is acknowledged building will remain in Flood Zone 1 in accordance with national policy, but has the impact of a changing climate been taken into account? What may not be an issue now may change in 10 years time.	Suggested changes: None	Officer comments: The Strategic Flood Risk Assessment makes an appropriate allowance for climate change. A site specific flood risk assessment would also have to make an allowance for climate change in accordance with Environment Agency guidelines.
Representation Reference: REF014.9 Name: National Trust	Refers to: POLICY 27: Site HS13: Ordsall South, Retford	Legal compliance and soundness: Legal compliance of plan - not specified. Plan is unsound. Compliance with Duty to Co-operate - not specified	Comments: Concerned that this large greenfield site has been introduced at a late stage to balance the over-allocation of employment land and is not justified. No in principal objection to new housing to meet the needs of the district. Concerned about the scale of development and greenfield land release proposed by this Local Plan, that this is not currently justified in the Local Plan evidence base.	Suggested changes: Review and revise employment and housing targets to reasonable levels and omit any unnecessary greenfield land allocations based on a review of the Local Plan evidence base.	Officer comments: Ordsall South was introduced in November 2020 at Regulation 18 stage. It is considered the Sustainability Appraisal, Land Availability Assessment and Site Selection Methodology are consistent with national policy and provide a robust basis by which to determine the most sustainable sites to be allocated to meet the identified housing need in the Plan.

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name: Representation Reference: REF021.4 Name: Sport England	Refers to: Policy 27: HS13 Ordsall South, Retford	Legal compliance and soundness: The plan is considered legally compliant, sound and complies with the Duty to Cooperate.	Comments: The policy is supported. Especially the part about on site or off site contributions to outdoor and indoor sport as informed by evidence.	Suggested changes: None	Officer comments: Noted
Representation Reference: REF023.9 Name: Muller Property Group on behalf of land owner	Refers to: Policy 27: HS13 Ordsall South, Retford	Legal compliance and soundness: Plan is legally compliant and complies with the Duty to Cooperate. Plan is unsound	Comments: The land in MPG's control that was refused planning permission extends to just over 7 hectares. Also control an additional 12 - 13 hectares as part of the same landholding, just under 20 hectares. Note the intention to allocate land at Ordsall South for 1,250 dwellings. If developed it would have an unacceptable impact on the Green Gap between Retford and Eaton. The size of HS13 should be reduced limiting the impact of the development on the Green Gap between Retford and Eaton. The land to the north east of Retford (Bigsby Road) is not affected by a Green Gap. In landscape terms, this a significant benefit over the allocation. The work undertaken for the outline planning application confirmed that there would be limited landscape and visual	Suggested changes: The plan is not effective and will not deliver as expected. Alternative SUEs around the more sustainable settlements such as the land north of Bigsby Road in Retford should be considered as an alternative allocation.	Officer comments: The identification of the green gap at Retford South has been informed by an independent report on local landscape quality and the historic environment. The identification of Green Gaps will not prevent development from taking place. Policy ST38 is explicit that if development reflects local landscape and character it may be acceptable within or adjoining a Green Gap. The latest application (19/01360/OUT) was dismissed on appeal. There is no evidence to demonstrate that the issues identified by the

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			impact so would be an alternative, less constrained site. It is slightly closer to the town centre. To meet the overall housing requirement for Retford, the size of HS13 is reduced so that it limits the impact on the Green Gap between Retford and Eaton and land to the north of Bigsby Road is allocated to deliver sustainable growth, with less impact (particularly landscape impacts).		Inspector of the Bigsby Road appeal relating to highway constraints can be addressed to the satisfaction of the Local Highways Authority.
Representation Reference: REF048.5 Name: Nottinghamshire County Council	Refers to: Policy 27: Ordsall South, Retford	Legal compliance and soundness: Plan is legally compliant – not specified Plan is unsound Complies with the Duty to Cooperate – not specified.	Comments: Policy 21 proposes 800 dwellings at Ordsall South, with the potential to increase to 1250 dwellings in the next plan. The Bassetlaw Transport Study (BTS) assumes 800 dwellings in the plan period. The Retford Transport Assessment assesses 1250 dwellings. The Retford Transport Assessment should assess the impact of 800 dwellings, potentially with a sensitivity test to cover the addition of 450 dwellings in the next plan. The conservative vehicle trip rates that appear in the RTA (para. 7.1.2) when compared to person trips and existing Ordsall travel to work census data are only likely to be achievable by providing a high frequency bus service, exemplar walking and cycling	Suggested changes: The Retford Transport Assessment (RTA) must include an assessment of the potential impacts of the Garden Village on junctions and traffic flows in Retford in order for NCC to understand the mitigation. Para 7.14.17 does not include the Garden Village and assesses 1250 dwellings this needs to be corrected to the proposed 800 in the Plan period. Para 7.14.18 demand management measures, if intended to mitigate for the lack of junction capacity, would	Officer comments: The May 2022 Second Addendum withdraws the Garden Village from the Local Plan. The Bassetlaw Transport Study 2022, accepted by the Local Highways Authority, and the Retford Transport Assessment have assessed the impact of traffic on the existing road network from the proposed allocation. The Local Plan including Policy 27 also promotes a shift towards more sustainable transport such as bus services, walking and cycling to help minimise the impact from

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>connections into Retford, and smarter choices/travel planning. Strongly support a cycling and walking network to form a key part of transport in market towns, little opportunity to provide good connected cycling facilities to Retford town centre. Nor is it possible to bring Retford town centre to within a reasonable 2km walking distance (RTA 3.4.4). Junctions that are likely to experience capacity issues are identified in the RTA but without feasible physical improvement means unspecified demand management measures are identified at the A620 Amcott Way/ Bridlegate/A620 Hospital Road/A638 North Road/Hallcroft Road roundabout; A620 Amcott Way/ A620 Moorgate/A638 Arlington Way; A638 Arlington Way / Grove Street; and A638 Arlington Way/A638 London Road/Carolgate. The predicted traffic impact at these junctions is based on vehicle trip rates that are considered low for Ordsall. It is unlikely that, undetermined, demand management measures would be capable of reducing the use of the private car than predicted, given walking distances and the inability to provide</p>	<p>need to effective and evidenced. Policy 21: Part 2 (l) note serviced land to accommodate a 1.0 Form Entry primary school and early years facility and associated supporting infrastructure; and an appropriate financial contribution towards enabling primary school education to address pupil growth associated with the development is proposed. It should be 1.5ha for the anticipated size of the school. Part 2.n)i The RTA only includes 1 point of access to the eastern parcel of land. Part 2.n)ii Providing meaningful DfT LTN 1/20 compliant cycling facilities on Ollerton Road/West Hill Road beyond Ordsall Primary School and within the wider highway network appears unlikely due to the road space available.</p>	<p>cars upon the road network. It is considered that this provides an appropriate evidence base and approach to identify the necessary transport requirements, including improvements to junctions and links in the locality from this site, as well as a proportionate split per allocation in terms of the traffic impact and the contribution towards the identified mitigation. The January 2022 Addendum amends Policy 27. This is considered appropriate to address the detailed matters identified.</p>

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>connected cycling facilities. The capacity issues would be compounded by the Garden Village traffic which have not been accounted for. Unable to support Ordsall South as it has not been established whether the allocation would remove these capacity concerns and whether that would remain the case if the Garden Village was included.</p>	<p>Part 2.n)iii The junctions requiring improvement should be secured by condition, potentially split with the other larger Retford allocations and the Garden Village. Where appropriate pooled contributions via S106 or other means may be used. Part 2.o) demand management measures are not defined, nor has it been demonstrated that they would be effective. Part 2.p)c. and Part 2.p)e. financial contribution to a marked cycle lane along Brecks Road and to a marked cycle lane into Old Ordsall Village may not fit or is parked on. This should be secured by condition. Most people would be comfortable cycling with mixed traffic where the speed of traffic is <20mph and there are <2000 vehicles/day</p>	

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name: Representation Reference: NRF-REF006.2 Name: Barton Wilmore on behalf of Howard (Retford) Ltd	Refers to: Policy 27: Site HS13 Ordsall South, Retford	Legal compliance and soundness: Plan is legally compliant – not specified Soundness – not specified Complies with the Duty to Cooperate – not specified.	Comments: Represents a sustainable urban extension that benefits from excellent public transport connectivity. The strategy for the release of this site is soundly based.	Suggested changes: None	Officer comments: Noted
Representation Reference: 008.3 Name: Retford Civic Society	Refers to: Policy 27: Site HS13 Ordsall South, Retford	Legal compliance and soundness: Plan is legally compliant – not specified Soundness – not specified Complies with the Duty to Cooperate – not specified.	Comments: The extension to Ordsall is not needed and could be removed if a more sensible housing target were adopted. If house building as proposed is accepted, putting so many houses into Ordsall is unacceptable. Recent by-election made it clear; 80% of voters supported candidates opposed to the site. It is unclear why so many houses are concentrated in one place rather than spread around smaller sites which would be more easily absorbed. The failure to explain this was highlighted in the June 2021 press statement claiming it was required by government policy. Government Policy does not require houses	Suggested changes: Remove Ordsall South site allocation from the Plan	Officer comments: It is considered the Sustainability Appraisal, Land Availability Assessment and Site Selection Methodology are consistent with national policy and provide a robust basis by which to determine the most sustainable sites to be allocated to meet the identified housing need in the Plan. The Local Plan does not state that the housing figure is a requirement of Government policy. The

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>proposed at Ordsall to be increased. Ordsall has expanded a lot with minimal improvement to local infrastructure. It would double the 2011 population increasing traffic on local roads; improving a few junctions would not off-set the narrowness or remove the two pinch-points at the river bridge and where West Carr Road crosses the railway. A cycle lane along West Hill Road is likely to adversely affect local residents who need to park and the cycle lane along Brecks Road is impractical as the highway is too narrow. Little indication how the community benefits would be delivered. The built provision is a community shop but many villages of this size cannot support an established shop. BDC would be unable to maintain the country park, or to provide and maintain other community facilities, the County Councillor has confirmed that the Education Authority has no plans to build a new school and unclear that the health authorities would provide services. Should not proceed unless this provision is secured; it would be a housing estate with minimal facilities, situated far</p>		<p>January 2022 Addendum amended Policy 27 relating to Ordsall South; this is considered to provide an appropriate policy framework to ensure the housing requirement is delivered with appropriate supporting infrastructure, including a new primary school, day care nursery and health hub, manages environmental impact and provides relevant mitigation off-site to address potential impacts identified by the evidence. The Bassetlaw Transport Study 2022, accepted by the Local Highways Authority, and the Retford Transport Assessment have assessed the impact of traffic on the existing road network from the proposed allocation. The Local Plan including Policy 27 also promotes a shift towards more sustainable transport such as bus services, walking and</p>

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			from Retford town centre. Would do little to benefit Retford town centre.		cycling to help minimise the impact from cars upon the road network. It is considered that this provides an appropriate evidence base and approach to identify the necessary transport requirements, including improvements to junctions and links in the locality from this site, as well as a proportionate split per allocation in terms of the traffic impact and the contribution towards the identified mitigation. In relation to education: Officers of the County Council, acting within their delegated powers, had made clear in written responses to BDC that Ordsall South as proposed would generate sufficient demand to sustain a primary school. At no point in these discussions had NCC Officers suggested that there was any likelihood that the County

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
					Council would oppose the provision of a school. This was confirmed by NCC in their representations. The CCG have provided their support for the health hub including GP surgery as evidenced by a statement of common ground. It is considered that the additional homes have the potential to provide significant benefits to Retford town centre in terms of additional people visiting and additional spend.
Representation Reference: NRF-REF019.2 Name: Rotherham Metropolitan Borough Council	Refers to: Policy 27: Site HS13 Ordsall South, Retford	Legal compliance and soundness: Plan is legally compliant – not specified Soundness – not specified Complies with the Duty to Cooperate – not specified.	Comments: Further information on the quality of bus services will be needed to ensure sustainable transport connections to Retford town centre and beyond. Welcome a bus loop, and paragraph 7.14.18 recognises the need to encourage public transport use at the early stages. Bassetlaw does not benefit from Green Belt, care should be taken to ensure that Ordsall South and Bassetlaw Garden Village do not risk excessive sprawl and coalescence. Support for the allocation within a	Suggested changes: No changes suggested	Officer comments: Policy 27 requires the development to make provision for a high frequency bus service. The details will be confirmed as part of the planning application process. The May 2022 Second Addendum withdraws the Garden Village from the Local Plan. Ordsall South has clear defensible boundaries; it is not

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			Green Gap which will protect the wider countryside.		considered the development would lead to coalescence with nearby villages.

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name:					
Representation Reference: 1936572.1 Name: Resident	Refers to: POLICY 28: Site HS14: Ollerton Road, Tuxford	Legal compliance and soundness: Plan is legally compliant. Plan is unsound. Plan does not comply with Duty to Co-operate.	Comments: The proposed housing on Ollerton Road, Tuxford will increase the traffic considerably. The traffic through the small town centre roads of Tuxford is already busy and the traffic along Ollerton Road is actually quite dangerous. The HGV traffic is also considerable. This will increase during construction. There are already several houses in Tuxford which have not yet sold, so there is not a need for 60+ new houses.	Suggested changes: None	Officer comments: The site has been assessed through the Bassetlaw Transport Study for its impact on the local highway network, and the outcomes have been accepted by the Local Highways Authority. Policy 28 makes provision for an improved pedestrian and cycle link to the Centre via the existing public right of way along Long Lane to everyday facilities such as the local shops and the Primary School.
Representation Reference: 1944335.1 Name: BDC Cllr	Refers to: POLICY 28: Site HS14: Ollerton Road, Tuxford	Legal compliance and soundness: Plan is legally compliant. Plan is unsound. Plan complies with Duty to Co-operate.	Comments: Site has not been appropriately considered against all other sites within the town. Tuxford has been treated differently from other Large Rural Settlements.	Suggested changes: To re-open consultation on this site and properly consider alternative options, which the Town Council and the majority of residents are in favour of. Alternatively, allow the review of Tuxford's Neighbourhood Plan to allocate housing, as is the case in other 'Large Rural Settlements'. This	Officer comments: After the "call for land" consultation led by the neighbourhood plan group there has been several consultations on proposed Local Plan sites within Tuxford, all of which were in accordance with Local Plan regulations. Tuxford Town Council were advised in 2019 and 2020 that they could look for alternative sites or additional sites through the review of their Neighbourhood Plan. Without that, the Local Plan has had to

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
				will ensure that Tuxford is not being treated differently, and transparency is maintained.	take a position on the growth requirement and site allocations for this Large Rural Settlement. All known available sites have been assessed through the LAA, Sustainability Appraisal and Site Selection Methodology. The Sustainability Appraisal has assessed all "reasonable alternatives" as potential development options. It is considered this is robust, transparent and consistent with national policy.
Representation Reference: REF020.6 Name: Town Planning.co.uk on behalf of consultee	Refers to: POLICY 28: Site HS14: Ollerton Road, Tuxford Paragraph 7.15.1	Legal compliance and soundness: Plan is legally compliant and complies with the Duty To Cooperate. Plan is unsound.	Comments: The Local Plan preparation process has been littered with inconsistencies relating to this site, both in relation to its size and the reference given to it during its production leading to confusion among residents.	Suggested changes: None	Officer comments: It is acknowledged that at Regulation 18 stage there was a factual error relating to the site reference number and site area. These have been clarified at Regulation 19 stage in Policy 28.
Representation Reference: REF020.9 Name: Town Planning.co.uk	Refers to: POLICY 28: Site HS14: Ollerton Road, Tuxford	Legal compliance and soundness: Plan is legally compliant and complies with the	Comments: Concern over the impact of the development of NP14 on the Environment through the destruction of local wildlife, the impact on the landscape through the development of an	Suggested changes: None	Officer comments: The Land Availability Assessment provides an overall assessment of the site. The Site Allocations Landscape Assessments assessed the original, larger site boundary

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
on behalf of consultee		Duty To Cooperate. Plan is unsound	edge of settlement and greenfield site, and the loss of high-grade agricultural land.		submitted by the owner; this identified a negative landscape impact. These assessments informed the reduction of the site area to that proposed by Policy 28. The Sustainability Appraisal identifies the site has a low biodiversity quality due to its use as intensive arable farmland, but recognises the loss of agricultural land. Due to its edge of settlement location and landscape quality, Policy 28 requires the design of the site to positively reflect its location and context.
Representation Reference: REF020.10 Name: Town Planning.co.uk on behalf of consultee	Refers to: POLICY 28: HS14 Ollerton Road, Tuxford, Point 2. Section h)	Legal compliance and soundness: Plan is legally compliant and complies with the Duty To Cooperate. Plan is unsound	Comments: Concern on the highway impacts resulting from the development of this site. There is also concern about the sites location and the lack of connectivity to the existing road network and the built up part of the town.	Suggested changes: None	Officer comments: The site has been assessed through the Bassetlaw Transport Study for its impact on the local highway network, and the outcomes have been accepted by the Local Highways Authority. Policy 28 makes provision for an improved pedestrian and cycle link to the Centre via the existing public right of way along Long Lane to everyday facilities such as

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
					the local shops and the Primary School.
Representation Reference: REF048.18 Name: Nottinghamshire County Council	Refers to: POLICY 28: Site HS14: Ollerton Road, Tuxford	Legal compliance and soundness: Plan is legally compliant and complies with the Duty To Cooperate – not specified. Plan is sound – not specified	Comments: Wish the policy to secure internal street infrastructure that provides the capability of serving future development to the west and south to reduce the potential for further isolated enclaves coming forward in the next plan period.	Suggested changes: Add: “Internal street infrastructure should be capable of serving this development and any future development”	Officer comments: To promote good design it is considered that a proposed suggested change to Policy 28 would address this matter: new criterion h)ii provision of internal street infrastructure that should be capable of serving this development and any future development

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Representation Reference: 1945105.3 Name: Inovo Consulting on behalf of Hallam Land Management	Refers to: POLICY ST29: Affordable Housing	Legal compliance and soundness: Legal compliance - not specified. Soundness of plan - not specified. Compliance with Duty to Co-operate - not specified.	Comments: Criterion 7 makes reference to amendments to planning permissions resulting in a reduction in affordable housing from the original permission on the basis of viability. This should be adopted in the original planning application where viability is challenging. In respect of large scale strategic sites such as Peaks Hill Farm it will be important to recognise there may be viability constraints. Policy 58 goes some way to acknowledging this but there is inconsistency in these policies. Policy 29:4 appears to only consider a financial contribution for off-site provision of affordable housing where viability of development is challenging. It is unclear how a financial contribution in lieu of on-site provision would assist viability if that contribution is equivalent in cost.	Suggested changes: Amend Policy ST29 to refer to assessment of viability at outline stage.	Officer comments: The May 2022 Second Addendum amends Policy ST29. It is considered that this addresses the matters raised and provides consistency with Policy ST58 in particular. The Whole Plan Viability Assessment 2022 indicates that Peaks Hill Farm can be delivered as part of a financially viable scheme with all relevant Local Plan policy requirements.
Representation Reference: REF034.12 Name: Spawforths on behalf of the landowner	Refers to: POLICY ST29: Affordable Housing	Legal compliance and soundness: Plan is not legally compliant, sound and it does not comply with the Duty to Cooperate.	Comments: Policy ST29 broadly reflects national policy and guidance, but in places lacks clarity. Generally supportive of the need for affordable housing. However, it could result in the need for a viability assessment of schemes on a regular basis. Policy ST29 is consistent with the Government's Written Ministerial Statement requirement for 25% of affordable housing to be First Homes. It is inconsistent with the NPPF that at least 10% of homes will be available for affordable home ownership. Ambiguous regarding affordable housing tenure mix. Needs	Suggested changes: To overcome the objection and address soundness matters, the Council should Update policy and evidence base to reflect national policy and guidance.	Officer comments: The May 2022 Second Addendum amends Policy ST29. It is considered that this addresses the matters raised. It is considered that the assumptions adopted in the Whole Plan Viability Assessment 2022 for affordable housing are reasonable and in line with statutory guidance relating to First Homes. The

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			clarification by supporting evidence. Have First Homes been viability tested? The Council has only tested a certain proportion of affordable housing mix in the viability assessment. Any deviation will not be in accordance with the evidence base. The policy and the evidence should be updated to reflect national policy and guidance.		requirement for a minimum 10% of homes on major sites to be affordable homes to buy is in the NPPF - it is not considered necessary to duplicate this in the Local Plan, particularly as this is included within the 25% First Homes requirement.
Representation Reference: REF035.4 Name: Home Builders Federation	Refers to: POLICY ST29: Affordable Housing	Legal compliance and soundness: Plan is legally compliant and complies with the Duty to cooperate. Plan is unsound.	Comments: Support the Council's differentiated approach to the provision of affordable housing on brownfield and greenfield sites, which is justified by the Council's Viability Assessment. Policy ST29 is consistent with 24 May 2021 Written Ministerial Statement requirement for 25% of affordable housing to be First Homes. It is inconsistent with the 2021 NPPF expectation that at least 10% of homes will be for affordable home ownership. Policy ST29 is imprecise regarding affordable housing tenure mix and doesn't accord with the NPPF. Further clarification on affordable housing tenure mix should be justified by evidence. The Viability Assessment tested a specific affordable housing tenure mix (50% low cost homeownership / 50% affordable rent), any deviation will impact on viability. The impacts of First Homes on viability have not been tested. Further viability sensitivity testing work should be undertaken. Policy ST29 should be more flexible regarding	Suggested changes: 1. Should require at least 10% of homes for affordable home ownership. 2. Should provide further clarification of required tenure mix. 3. The housing mix should not deviate from the Viability Assessment (50% low cost homeownership / 50% affordable rent). 4. Should be more flexible regarding on-site and off-site provision of	Officer comments: The May 2022 Second Addendum amends Policy ST29. It is considered that this addresses the matters raised. It is considered that the assumptions adopted in the Whole Plan Viability Assessment 2022 for affordable housing are reasonable and in line with statutory guidance relating to First Homes. The requirement for a minimum 10% of homes on major sites to be affordable homes to buy is in the NPPF - it is not considered necessary to duplicate this in the Local Plan, particularly as this is included within the 25% First Homes requirement.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			on-site and off-site provision of affordable housing. On smaller sites, on-site provision may not be practical or possible.	affordable housing. 5. Impact of First Homes should be tested through the WPVA.	
Representation Reference: REF044.1 Name: Churchills Retirement Living	Refers to: POLICY ST29 Affordable Housing	Legal compliance and soundness: Policy is not legally compliant or sound Compliance with Duty to Cooperate – not specified	Comments: Support differential affordable housing requirement. No viability appraisals were undertaken for specialist older persons' housing typologies. This is contrary to the Viability PPG. Bassetlaw HEDNA (2020) and Policy ST31 details a requirement for 3,000 units of specialist older persons' housing (and a further 603 care home spaces) over the Plan period. Unless action is urgently taken the Council will struggle to address this need. Viable sites will be required over the Plan period. WPVA pages 40 -42 show that apartments are unviable with the lowest requirement of affordable housing tested. Brownfield sites are less viable than greenfield sites. The viability of specialist older persons' housing is finely balanced than 'conventional' apartments because Build costs are higher; Communal floorspace accounts for 25% - 35% GIA, compared to 15% for flats; Sales rates are currently under 1 unit per month with the nearest retirement living scheme, Eliot Lodge, Ashbourne, selling at a rate of 0.7 units per month. Specialist older persons' housing can achieve an uplift on sales values compared to	Suggested changes: Recommend an addition to <i>Policy ST29: Affordable Housing</i> as follows: <i>c) Contributions will not be sought from self-build, custom housebuilding developments or specialist older persons' housing including sheltered and extra care accommodation.</i>	Officer comments: The May 2022 Second Addendum amends Policy ST29. It is considered that this addresses the matters raised. It is considered that the assumptions adopted in the Whole Plan Viability Assessment 2022 for affordable housing are reasonable and in line with statutory guidance.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>'conventional' apartments, this is less pronounced in lower value areas. The viability findings reflect that of McCarthy Stone and Churchill Retirement Living who have struggled to bring forward specialist older persons' housing in Bassetlaw. Appropriate to set a nil affordable housing target for sheltered/extra care development, at least in urban areas. This accords with the PPG which states that <i>'Different (affordable housing) requirements may be set for different types or location of site or types of development'</i> (Paragraph: 001 Reference ID: 10-001-20190509). Refers to Paragraph 5.33 of <i>Policy HP5: Provision of Affordable Housing</i> in the emerging Fareham Borough Local Plan which advises that: <i>The Viability Study concludes that affordable housing is not viable for older persons and specialist housing. Therefore, Policy HP5 does not apply to specialist housing or older persons housing.</i></p>		
<p>Representation Reference: REF047.8</p> <p>Name: Welbeck Estates</p>	<p>Refers to: POLICY ST29: Affordable Housing</p>	<p>Legal compliance and soundness: Plan is legally compliant and complies with Duty to Cooperate.</p> <p>Plan is unsound.</p>	<p>Comments: Policy 29 is still too restrictive and leaves little scope for meaningful negotiation or dialogue in terms of viability. The NPPF states that Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required. It states that such policies should not undermine the deliverability of the Plan. The policy does not have any clear criteria</p>	<p>Suggested changes: The policy should have clear criteria or a caveat which would ensure that the policy does not undermine the deliverability of the Plan.</p>	<p>Officer comments: The May 2022 Second Addendum amends Policy ST29. It is considered that this addresses the matters raised. It is considered that the assumptions adopted in the Whole Plan Viability Assessment 2022 for affordable housing are</p>

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			which would ensure that the policy does not undermine the deliverability of the Plan if the situation presents itself (such as developments no longer being viable due to high affordable housing requirements). It is noted that Part '8', recognises the need for market housing to rural exception sites viable and this supported.		reasonable and in line with statutory guidance.
Representation Reference: NRF-REF014.17 Name: East Markham Parish Council	Refers to: POLICY ST29: Affordable Housing	Legal compliance and soundness: Legal compliance of plan - not specified. Soundness of plan - not specified. Compliance of plan with Duty to Co-operate - not specified.	Comments: East Markham Parish Council fully endorses this policy and requests that it is enforced.	Suggested changes: None	Officer comments: Noted.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Representation Reference: REF034.13 Name: Spawforths on behalf of the landowner	Refers to: POLICY ST30: Housing Mix	Legal compliance and soundness: Plan is not legally compliant, sound and it does not comply with the Duty to Cooperate.	Comments: Support principle but considered too prescriptive. The policy should be amended to encourage or reflect rather than ensure or require. Recommend that a flexible approach is taken regarding housing mix, which recognises that need and demand will vary from area to area and site to site, to ensure that the scheme is viable, and provides an appropriate mix for the location.	Suggested changes: To overcome the objection and address soundness matters, the Council should: <ul style="list-style-type: none"> • Increase the number of allocations to create choice and a diverse housing market. • Include flexibility in Part 1 of the policy. 	Officer comments: Part 1 of Policy ST30 refers to providing for an appropriate mix informed by the Council’s most up to date evidence. It is considered that this is not prescriptive and provides enough flexibility to enable applicants to negotiate housing mix with the Local Planning Authority at application stage. It is considered that the Local Plan contains an appropriate number and mix of allocations to provide choice and a diverse market.
Representation Reference: REF035.5 Name: Home Builders Federation	Refers to: POLICY ST30 – Housing Mix	Legal compliance and soundness: Plan is legally compliant and complies with the Duty to cooperate. Plan is unsound.	Comments: Supportive of the majority of the policy approach towards self & custom build as set out in Policy ST30. Not supportive of Policy ST30 Bullet Point 3, which states that sites of more than 100 dwellings should set aside 2% of plots for self & custom build housing. There is no legislative or national policy basis, or evidence for imposing this obligation on landowners or developers. Approach doesn’t accord with NPPG for self & custom build. It is the responsibility of	Suggested changes: Policy ST30 Bullet Point 3 should be deleted as it doesn’t meet the NPPF’s 4 tests of soundness.	Officer comments: The policy approach accords with national Self-Build and Custom Housebuilding PPG Paragraph: 025 Reference ID: 57-025-20210508. There is no evidence to show that serviced self build plots will not fetch a premium price. It is considered that individual plots are very attractive to buyers seeking to build their own property and command

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>the Council, not landowners or developers, to ensure that sufficient permissions are given to meet demand. The Self build Register cannot be reliably translated into actual demand. The proposed availability of serviced plots to households on the Council's Self Build Register for a period of 12 months is too long; it is important that unsold plots are not left empty to the detriment of neighbouring dwellings. Viability should be tested.</p>		<p>prices well in excess of the benchmark land values set out in the Whole Plan Viability Assessment that will enable the ancillary costs identified to be recouped.</p>
<p>Representation Reference: REF038.11</p> <p>Name: Fisher German on behalf of land owner</p>	<p>Refers to: POLICY ST30: Housing Mix</p>	<p>Legal compliance and soundness: Not specified.</p>	<p>Comments: Broadly support; whilst the housing mix should reflect and be supported by up-to-date evidence on need, an allowance must be added to ensure schemes coming forward are also able to reflect local market signals and demands. This ensures schemes coming forward are viable and deliverable. Must also consider the impacts of the accelerated pattern of home working on peoples buying habits. Workspace/office space is often needed. This may imbalance local markets if sufficient supply is not delivered. This could disproportionately impact larger dwellings, increasing house prices pricing out families who require larger properties due to having more children for example.</p>	<p>Suggested changes: An allowance must be added to the policy to ensure schemes coming forward are able to reflect local market signals and demands. This ensures schemes coming forward are viable and will be delivered quickly, with high levels of market absorption.</p>	<p>Officer comments: Part 1 of Policy ST30 refers to providing for an appropriate mix informed by the Council's most up to date evidence. It is considered that this is not prescriptive and provides enough flexibility to enable applicants to negotiate housing mix with the Local Planning Authority at application stage whilst having regard to the evidence and any other material considerations.</p>

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Representation Reference: REF038.12 Name: Fisher German on behalf of land owner	Refers to: POLICY ST30: Housing Mix	Legal compliance and soundness: Unsound	Comments: Object to point 3. the requirement for delivery of 2% of the developable plots to be set aside for self-build and custom housebuilding on sites of more than 100 dwellings. It is well established that such criteria are largely unworkable on modern housing developments and do not serve to provide additional units. Because individuals are registered on the self-build register does not mean that they will all build their own property, even if suitable land was available. Individuals can be on multiple self-build registers, which inflates the figures across a number of areas. This policy requirement will serve to frustrate and slow housing delivery. Assumes such plots could be built out by the developer; the nature of the plots may not however lend themselves to being built by the developer and as such could leave undeveloped plots for significant period of time. Such requirements will also deter developers, given the increased complexity.	Suggested changes: The Council should seek to ensure a positive policy environment exists where suitable self-build schemes, either of individual units or larger schemes providing serviced plots will be treated favourably. Remove requirement for 2% of plots on sites of 100 or more dwellings to be self build.	Officer comments: The policy approach accords with national Self-Build and Custom Housebuilding PPG Paragraph: 025 Reference ID: 57-025-20210508.
Representation Reference: REF038.13	Refers to: POLICY ST30: Housing Mix	Legal compliance and soundness: Not specified	Comments: No reference to self-build or the provision of serviced plots within the viability study so the impacts of such policy requirements and on site viability	Suggested changes: The Council should ensure a positive policy exists where suitable self-build schemes, either of	Officer comments: I There is no evidence to show that serviced self build plots will not fetch a premium price. It is

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name: Name: Fisher German on behalf of land owner			across the Plan are not known. Such proposals are likely to negatively impact viability in both the costs of providing such plots and the reduced land values.	individual units or larger schemes providing serviced plots will be treated favourably. This encourages delivery in line with the Council's statutory duties, without compromising sites which make up a vital facet of the Council's overall proposed housing supply.	considered that individual plots are very attractive to buyers seeking to build their own property and command prices well in excess of the benchmark land values set out in the Whole Plan Viability Assessment that will enable the ancillary costs identified to be recouped.
Representation Reference: REF043.18 Name: Gladmans	Refers to: POLICY ST30: Housing Mix	Legal compliance and soundness: Plan is legally compliant and complies with Duty to Cooperate. Plan is unsound.	Comments: Broadly support the suggested approach of Policy ST30, in particular, that the above policy does not set out a prescriptive approach regarding the specific mix of properties.	Suggested changes: None	Officer comments: Noted.
Representation Reference: REF043.19 Name: Gladmans	Refers to: POLICY ST30 Housing Mix	Legal compliance and soundness: Plan is legally compliant and complies with Duty to Cooperate. Plan is unsound.	Comments: Object to requirement for sites of 100 dwellings or more, 2% of the proportion of the developable plots to be set aside for self-build and custom housebuilding. No evidence to support requirement. Supporting text to this policy incorrectly states in paragraph 7.18.9: <i>"The Housing and Economic Development Needs Assessment 2020 on the demand for self-build suggests that there is potential to</i>	Suggested changes: Remove paragraph 7.18.9: <i>"The Housing and Economic Development Needs Assessment 2020 on the demand for self-build suggests that there is potential to encourage developers of larger housing site allocations to provide plots for self-build.</i>	Officer comments: The policy approach accords with national Self-Build and Custom Housebuilding PPG Paragraph: 025 Reference ID: 57-025-20210508. There is no evidence to show that serviced self build plots will not fetch a premium price. It is considered that individual plots are very attractive to

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p><i>encourage developers of larger housing site allocations to provide plots for self-build. Whilst it is recognised that not all self-builders want to build their homes on larger developments, they should be provided with an opportunity to do so...".</i></p> <p>The PPG is clear that self build should be published in the AMR. Bassetlaw District Council's AMR does not provide any information relating to the register. This approach does not appear to have been assessed. The policy hasn't been viability tested.</p>	<p><i>Whilst it is recognised that not all self-builders want to build their homes on larger developments, they should be provided with an opportunity to do so..."</i></p> <p>Criterion 3 of Policy ST30 should be removed from the policy.</p>	<p>buyers seeking to build their own property and command prices well in excess of the benchmark land values set out in the Whole Plan Viability Assessment that will enable the ancillary costs identified to be recouped. There is no requirement to publish self-build information in the Authority Monitoring Report. The Self Build and Custom housebuilding PPG Paragraph: 012 Reference ID: 57-012-20210508 states: 'Relevant authorities are encouraged to publish in their Authority Monitoring Report and the self and custom build section of their website'. The Local Plan monitoring framework identifies a self-build indicator to inform future versions of the AMR. It is acknowledged that paragraph 7.18.9 inadvertently refers to the HEDNA. It is considered that a proposed suggested</p>

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
					change will address this matter: The Self-Build and Custom Housebuilding PPG indicates that to ensure enough serviced plots with suitable permission come forward for self-build housing various options should be considered including requiring a number of units as part of certain allocated sites, or on certain types of site. Housing and Economic Development Needs Assessment 2020¹⁰ on the demand for self-build suggests that there is potential to encourage developers of larger housing site allocations to provide plots for self-build.
Representation Reference: REF047.5 Name: Welbeck Estates	Refers to: POLICY ST30: Housing Mix	Legal compliance and soundness: Plan is legally compliant and complies with Duty to Cooperate. Plan is Unsound.	Comments: Do not support Part 3 which stipulates that allocations of more than 100 dwellings should provide a 2% proportion of plots for self-build projects, which would expire after 12 months of no interest. This has been proven not to be a sound process in neighbouring recent Local Plan Examinations (Bolsover and Mansfield). Recommend a policy which	Suggested changes: Remove part 3 of the Self Build Policy (allocations of more than 100 dwellings should provide a 2% proportion of plots for self-build projects, which would expire after 12 months of no interest).	Officer comments: The policy approach accords with national Self-Build and Custom Housebuilding PPG which was published after the examination of Mansfield and Bolsover Plans (on 8/2/2021). Paragraph: 025 Reference ID: 57-025-20210508. It is considered

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>promotes self-building in larger developments, and also the role of custom and self-build homes as examples of limited forms of development that would be suitable in the countryside, as opposed to a percentage which may inhibit housing from coming forward. Without this amendment the Policy is not: Positively prepared, Justified, Effective</p>		<p>that a proposed suggested change to Policy ST2 a new criterion c) would address the point relating to development suitable in the countryside: self and custom-build housing in accordance with Part 2 above.</p>
<p>Representation Reference: NRF-REF014.18</p> <p>Name: East Markham Parish Council</p>	<p>Refers to: POLICY ST30: Housing Mix</p>	<p>Legal compliance and soundness: Not specified</p>	<p>Comments: Endorse this policy. Should be noted that recent developments have failed to reflect the character of the village and have not provide adequate starter homes or homes for elder residents. Refers to Neighbourhood Plan policy NP2. It is our view that this policy has been ignored in recent planning submissions by BDC.</p>	<p>Suggested changes: None</p>	<p>Officer comments: Policy ST30 supports the Neighbourhood Plan Policy approach and provides further justification for delivering an appropriate housing mix to meet evidenced local needs.</p>

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name: Representation Reference: 1945105.4 Name: Inovo Consulting on behalf of Hallam Land Management	Refers to: POLICY ST31: Specialist Housing	Legal compliance and soundness: Plan is legally compliant. Plan is unsound. Plan complies with Duty to Co-operate.	Comments: The requirements of policy ST 31:3 in appears to duplicate the provisions of Part M of the building regulations.	Suggested changes: Suggest this provision is omitted as it is unnecessary.	Officer comments: Policy ST31: 3 accords with national planning guidance: Housing: optional technical standards (Paragraph: 007 Reference ID: 56-007-20150327).
Representation Reference: REF035.6 Name: Home Builders Federation	Refers to: POLICY ST31: Specialist Housing	Legal compliance and soundness: Plan is legally compliant and complies with the Duty to cooperate. Plan is unsound.	Comments: Policy ST31 3: If the Council wishes to adopt the optional standards for accessible & adaptable dwellings, then this should be done in accordance with the 2021 NPPF (para 130f & Footnote 49) and the latest NPPG. Under the NPPF, all policies should be underpinned by relevant and up to date evidence which should be adequate, proportionate and focussed on justifying the policies concerned (para 31). M4 (2) dwellings must be justified by credible and robust evidence. The NPPG sets out the evidence necessary to justify a policy requirement for optional standards. The Council's evidence in the HEDNA November 2020 does not justify the proposed policy requirements for M4(2). It does not identify any local	Suggested changes: Policy ST31 3 is unsound, is not positively prepared, justified, effective and consistent with national policy. Before the Bassetlaw Local Plan is submitted for examination, Policy ST31 3 should be deleted or modified as outlined.	Officer comments: It is considered that the HEDNA 2020 accords with national planning guidance: Housing: optional technical standards (Paragraph: 007 Reference ID: 56-007-20150327). It is incorrect to say that the Bassetlaw HEDNA only considers evidence on an aging population, it takes into consideration a range of datasets in line with the Housing for Older and Disabled Persons PPG (Paragraph: 004 Reference ID: 63-004-20190626, date: 26 June 2019). Paras. 7.19.1-7.19.3 of the Local Plan provides local context. The

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>circumstances, which demonstrate that the needs of Bassetlaw differ substantially to those across the East Midlands or England. If the Government had intended that evidence of an ageing population justified adoption of optional standards, then such standards would have been incorporated as mandatory in the Building Regulations. All new homes are built to M4(1) “visitable dwelling” standards. These are not usually available in the older existing housing stock and benefit less able-bodied occupants and are likely to be suitable for most residents. Not all health issues affect housing needs. Many older people live in the District and are unlikely to move home. No evidence suggests that households already housed would be prepared to move into new dwellings constructed to M4(2) standards and those who do move may not live in a new dwelling. Savills “Delivering New Homes Resiliently” October 2020 shows that over 60’s “are less inclined to buy a new home than a second-hand one, with only 7% doing so”. The District’s existing housing stock is significantly larger than its new build, adaption of</p>		<p>Government have not yet included the accessibility standards in Part M of the Building Regulations. Consequently, the Policy is necessary, justified and it will effectively address older and disabled persons need for specialist housing, thereby meeting the tests of soundness of the NPPF. The Whole Plan Viability Assessment allows for an £11/m² as a 1% extra over cost allowance (in section 2.5) and is the additional cost in meeting Category 2 standards for typical houses, rather than equating fixed costs to specific house types. The Viability Assessment that supports the May 2022 Second Addendum confirms that the policy requirement can be achieved as part of a financially viable scheme.</p>

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>existing stock will form an important part of the solution. The NPPF confirms that Local Plans should avoid unnecessary duplication; the proposed policy will be unnecessary if the Government implements changes to Part M of the Building Regulations as set out in the "Raising Accessibility Standards for New Homes" consultation, 1 December 2020. The Council's Viability Assessment underestimates the extra over costs of Policy ST31 Bullet Point 3. Further viability sensitivity testing work should be undertaken.</p>		
<p>Representation Reference: REF044.2</p> <p>Name: Churchills Retirement Living</p>	<p>Refers to: POLICY ST31: Specialist Housing</p>	<p>Legal compliance and soundness: Plan is legally compliant and complies with the Duty to cooperate.</p> <p>Plan is unsound.</p>	<p>Comments: McCarthy Stone and Churchill Retirement Living are independent and competing housebuilders specialising in sheltered housing for older people. Refers to Paragraph 1 of the PPG Housing for Older and Disabled people. The supporting text to Policy ST31 advises that that the population aged 65 and over is projected to increase by 9,663 people between 2020 and 2037, a 40% increase. 75 and over is the demographic with the largest projected increase, 75.6% - an increase of 5,905 persons. Table 60 of</p>	<p>Suggested changes: The lack of consideration given to older persons' housing typologies in Policy ST29: Affordable Housing and the Bassetlaw District Council Whole Plan & Community Infrastructure Levy Viability Assessment is disappointing.</p>	<p>Officer comments: It is worth noting that it is not the responsibility of the Local Plan or the planning system to facilitate the delivery of the specialist housing need identified in the HEDNA 2020. Instead the Local Plan should make a fair and reasonable contribution to meeting that need through new development. The Housing: optional technical standards PPG Paragraph: 008 Reference ID: 56-008-20160519 states</p>

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>the <i>Housing and Economic Development Needs Assessment</i> (2020) advises that there is a significant requirement for 2,018 units of housing with support and 911 units of housing with extra care. The biggest requirement is for open market units. The delivery of 3,000 units of specialist older persons' housing (and 603 care home spaces) is a substantial undertaking over the Plan period. The consequences of failing to provide sufficient housing to meet older peoples' needs is clear - 44% of those on the Council's housing waiting list (at January 2020) are older people requiring specialist accommodation in the short term. The Council spends c£1m per annum on adaptations to ensure that tenants can remain in their home. Commend the way the housing needs of older people are addressed in Policy ST31. Supporting text is comprehensive and the inclusion of dedicated policy for older persons' housing to be positive as it acknowledges the need and stipulates the circumstance in which the Local Authority will support its delivery. Further consideration should be given to older persons' housing typologies in</p>		<p>that Local Plan policies should take into account site specific factors such as vulnerability to flooding which may make a specific site less suitable for M4(2) compliant dwellings. It is considered that a proposed suggested change to Policy ST31 part 3 will clarify the Local Plan's position on this point: 'Proposals for residential market housing in Class C3, in Flood Zone 1 should be designed to meet the requirements for accessible and adaptable dwellings under Part M4(2) of the Building Regulations.' The Whole Plan Viability Assessment that supports the May 2022 Second Addendum confirms that the policy requirement can be achieved as part of a financially viable scheme. The May 2022 Second Addendum amends Policy ST29. It is considered that this addresses relevant matters identified.</p>

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			Policy ST29: Affordable Housing and the Whole Plan Viability Assessment. Struggled to bring forward older persons' housing in Bassetlaw as have been unable to make development viable.		

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Representation Reference: REF006.2 Name: Hayton Parish Council	Refers to: POLICY ST32: GT001: Land at Hayton	Legal compliance and soundness: Legal compliance of plan - not specified. Plan is unsound. Compliance with Duty to Co-operate - not specified	Comments: The plan states that these developments should support the establishment or re- establishment on vacant plots and/or the extension of the existing authorised Gypsy & Traveller sites. Within Hayton Parish there is only one existing site. The Parish Council consider that the current site is in breach of the conditions set when planning was approved. Raised with BDC; the site is authorised for 3 pitches, although the extent of the size of is not known, there is strong evidence to suggest that the site is now extensive and it is also being operated for commercial gain. The site is not large enough to support an additional 17 pitches and to the best of our knowledge there is no surrounding land suitable for development. Believe that the site fails under section –b, d, e, f, g, i & j (ST32 point 2). d) The proposal is not small scale, the site is currently authorised for 3 pitches the proposal of an additional 17 pitches is a 567% increase. Not a sustainable nor logical increase to such a small site. It was in 2019 when BDC last visited the site so their assumption that there is room for additional pitches is flawed e) The	Suggested changes: The proposed scale of increase to the size of the site is too large. Would like to see the increase to be lowered to a level at which is more appropriate to the size of the site.	Officer comments: This site has planning permission for one gypsy and traveller pitch for one family (three caravans). An application (18/01609/VOC) to vary condition 2 of planning permission 17/00102/VOC for one gypsy and traveller pitch for one family (3 Caravans) and to allow the siting of 3 mobile homes and 24 caravans was refused by Planning Committee in summer 2019. Since then officers have visited the site on 5 occasions, most recently on 23 November 2021. There is now only the site owner and their family and one other living on the site. The site comprises 3 static caravans, several touring caravans, timber utility building, and associated utility blocks, a bar and seating area and solar panels. Condition 2 of 17/00102/VOC states ‘No

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>current site is not in safe walking/cycling distance of education/healthcare/shops f) The scale of the development is not appropriate to local character. Hayton is a small rural village. i) The site is not of sufficient size to support 17 additional pitches, this would equate to up to 34 additional caravans. 17 additional pitches would place up to 20 families living in close proximity, this would not satisfy basic human living conditions. It would also exacerbate the risk of sewage overflow into the adjoining water course. 17 additional pitches added to the original 3 would potentially be a fire hazard due to their close proximity j) the site does not appear to be able to cope with such a large increase in pitches.</p>		<p>more than 3 mobile homes and 3 caravans shall be located on the site at any time'. It is unclear if this relates to all structures on the site but the block plan does show an amenity block that isn't referenced in the permission. Officers are of the opinion that many of the structures on the site are not development and are not restricted by the planning permission. From site visits on several occasions it is considered that the harm arising from the breaches is limited, the site has permission to be a residential site for travellers and, is tidy and well managed. The 2022 Addendum reduces the site capacity at Hayton to 10 additional pitches. This is considered an appropriate extension to this site, the site is capable of accommodating the number of pitches</p>

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
					associated with the proposed use and is capable of meeting all relevant safety standards. Site allocations, such as Hayton, are assessed in the LAA (and not by the criteria in Policy ST32), although the LAA reflects the criteria in Policy ST32.
Representation Reference: REF006.3 Name: Hayton Parish Council	Refers to: Paragraph 7.20.6	Legal compliance and soundness: Legal compliance of plan - not specified. Plan is unsound. Compliance with Duty to Co-operate - not specified	Comments: The site is located on a tight bend on a narrow lane. The road already supports HGV's as a route to avoid the railway bridge in Welham. An increase in traffic on this scale would not be acceptable.	Suggested changes: The proposed scale of increase to the size of the site is too large. Would like to see the increase to be lowered to a level at which is more appropriate to the size of the site.	Officer comments: The 2022 Addendum reduces the site capacity at Hayton to 10 additional pitches. This is considered consistent with the Local Highways Authority advice relating to accommodating additional pitches on site with commensurate access improvements.
Representation Reference: REF006.5 Name: Hayton Parish Council	Refers to: Paragraph 7.20.09	Legal compliance and soundness: Legal compliance of plan - not specified. Plan is unsound.	Comments: Would emergency stopover provision be in addition to the 17 proposed pitches? If so, how many additional pitches would be required, where would they be located?	Suggested changes: The proposed scale of increase to the size of the site is too large. Would like to see the increase to be lowered to a level at which is more appropriate to the size of the site.	Officer comments: Emergency stopover provision is to meet the needs of the gypsy and traveller community travelling through the district. This is considered separately to permanent pitches. This is considered

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
		Compliance with Duty to Co-operate - not specified			to be a housing need and is being considered separately to the Local Plan process by the Council's Housing Services.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Summary of comments:	Suggested changes by consultee:	Officer Comments
<p>Representation Reference: REF047.4</p> <p>Name: Welbeck Estate</p>	<p>Refers to: POLICY 34: Agricultural and Forestry Workers Dwellings</p>	<p>Legal compliance and soundness: Plan is legally compliant and complies with Duty to Cooperate.</p> <p>Plan is Unsound.</p>	<p>Comments: This policy is restrictive. Suggest changing the name of the policy to “Development in the Countryside”. Previously stated that Policy ST11 and Policy 34 should be merged to enable moderate growth in the rural economy and to complement Policy ST12 in relation to tourism and underused heritage buildings. The Council stated that Policy ST2, ST11, ST12 and Policy 31 comprehensively address all rural area matters identified by national policy. Welbeck Estate disagrees. The proposed approach would create a comprehensive, concise, and methodical policy relating to all development in the countryside, including those in the smallest settlements in the hierarchy, would promote modest growth within the rural economy, allow limited housing and improve the tourist offer, as desired by other policies in the plan. Recommend Bolsover Local Plan’s approach.</p>	<p>Suggested changes: Suggest changing the name of the policy to “Development in the Countryside”</p> <p>Policy ST11 “Rural Economic Growth and Economic Growth Outside Employment Areas” and Policy 34 “Agricultural and Forestry Workers Dwelling” should be merged to enable moderate growth in the rural economy.</p>	<p>Officer comments: The criteria proposed is covered by the NPPF (paragraph 80) and will be taken into consideration on a case by case basis. There is no requirement to repeat NPPF policies in the Local Plan.</p> <p>The Council considers that Policy ST2 Residential Growth in Rural Bassetlaw addresses rural housing, which together with Policy ST11: Rural Economic Growth and Economic Growth outside Employment Areas, Policy 34 Agricultural and Forestry Workers Dwellings and Policy ST12 Visitor Economy are expected to appropriately manage development in the rural area.</p>

Local Character and Distinctiveness

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name:					
Representation Reference: REF021.5 Name: Sport England	Refers to: POLICY ST35: Design Quality	Legal compliance and soundness: Plan is legally compliant, sound and complies with the Duty to Cooperate.	Comments: The policy is supported.	Suggested changes: None.	Officer comments: Noted.
Representation Reference: REF035.7 Name: Home Builders Federation	Refers to: POLICY ST35: Design Quality	Legal compliance and soundness: Plan is legally compliant and complies with the Duty to cooperate. Plan is unsound.	Comments: Under Policy ST35, Bullet Point (q) states “... <i>that accords with the most up-to-date Nottinghamshire Parking Standards</i> ”. Should not be interpreted by the Council’s Development Management Officers as conveying the weight of a Development Plan Document, which has not been subject to examination and does not form part of the Local Plan. The Regulations require development management policies, which will guide planning applications to be set out in Local Plan policies. To be effective, should be clear and unambiguous. The requirements should be in sufficient detail to determine a planning application without relying on separate guidance.	Suggested changes: Policy ST31 Bullet Point (q) is unsound, is not positively prepared, justified, effective and consistent with national policy. Before the Bassetlaw Local Plan is submitted for examination, it should be modified.	Officer comments: Nottinghamshire County Council (NCC) is the Local Highways Authority. The Nottinghamshire Parking Standards have been adopted by NCC and are considered to be the most appropriate document to refer developers to for guidance relating to parking standards in relation to the development in Bassetlaw. It is considered that a proposed suggested change to Policy ST35 1q) will ensure flexibility in the design process: ensures an appropriate level of well-integrated, convenient and visually attractive areas for motor vehicle and cycle parking that accords with the most up-to-date

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
					Nottinghamshire Parking Standards ⁵ unless it can be demonstrated that it is not viable or feasible to do so; and, provides for external storage including waste disposal;
Representation Reference: NRF-REF014.10 Name: East Markham Parish Council	Refers to: POLICY ST35: Design Quality	Legal compliance and soundness: Not indicated	Comments: Have no faith in the District Council oversee high class design throughout the district. There were instances in East Markham where the existing Successful Places Supplementary Policy Document (2013) has not be enforced during planning decisions.	Suggested changes: None.	Officer comments: Policy ST35 sets out the key design objectives that are critical in delivering high quality places and spaces, which must be considered at the outset and throughout the design process. Once the plan is adopted, Policy ST35 will require all planning applications to adhere to Policy ST35, as well as considering design codes/ special features identified in relevant Neighbourhood Plans.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Representation Reference: REF014.10 Name: National Trust	Refers to: POLICY ST37: Landscape Character	Legal compliance and soundness: Legal compliance of plan - not specified. Plan is sound. Compliance with Duty to Co-operate - not specified.	Comments: None	Suggested changes: None	Officer comments: None

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Representation Reference: REF014.11 Name: National Trust	Refers to: POLICY ST38: Green Gaps	Legal compliance and soundness: Legal compliance of plan - not specified. Plan is unsound. Compliance with Duty to Co-operate - not specified	Comments: Support the use of Green Gaps, but believes that there should be an additional area designated as a Green Gap to the East of Worksop to help prevent urban sprawl.	Suggested changes: Green Gaps ought to be revisited and that land to the east of Worksop should be given due consideration to prevent urban sprawl.	Officer comments: The Green Gaps have been defined based on the emerging policy context, recognising existing commitments and emerging allocations around settlements. Gaps have been identified where there is a strong landscape character. Part of the area to the East of Worksop is developed as employment. The rest is heavily wooded forming part of the northern extent to Sherwood Forest and Clumber Park which is protected through existing environmental designations. There is no need to designate a green gap within this area. A review of the comments on the Green Gaps submitted in response to the Local Plan consultations did not identify boundary changes to the proposed Green Gaps.

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name:					
Representation Reference: REF015.1 Name: Resident	Refers to: POLICY ST38: Green Gaps	Legal compliance and soundness: Plan is legally compliant. Plan is sound. Plan complies with Duty to Co-operate.	Comments: Supports the use of Green Gaps; a larger part of North Retford should be included within the designated Green Gaps, and sights a recent appeal decision where an application was partly dismissed for landscape reasons.	Suggested changes: Based on the conclusions of the Planning Inspectorate, at least part of the land to the north east of Retford and west of the Chesterfield Canal should be included within a Green Gap.	Officer comments: The identification of this green gap has been supported by an independent report on local landscape quality and the historic environment towards the north of Retford. There are significant landscape and heritage assets or existing designations that would limit and further manage development in this location. As such there is no need to expand the Green Gap to the north of Retford.
Representation Reference: REF040.9 Name: McLoughlin Planning on behalf of land owner	Refers to: POLICY ST38: Green Gaps	Legal compliance and soundness: Legal compliance and compliance with Duty to Cooperate - not specified. Plan is unsound	Comments: Object to the principle of Green Gaps and believes their designation to be unsound. A particular reference to Green Gap 4 to the West of Worksop.	Suggested changes: The following amendments are required to ensure a sound Local Plan can proceed to examination: • bring forward site LAA206 (preferred option) on the edge of Worksop as an allocation to reduce the risk of future under delivery as part of Local Plan policy HS15. This development site is deliverable and has a reliable housing developer	Officer comments: The identification of this green gap has been supported by an independent report on local landscape quality and the historic environment towards the West of Worksop. There are significant landscape and heritage assets or existing designations that would limit and further manage development in this location. The identification of Green Gaps will not prevent the overall development

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
				<p>ready to bring the site forward.</p> <ul style="list-style-type: none"> • amend the proposed planning policy map to address the issues associated with emerging Local Plan policies GG4 and ST38. 	<p>requirement from being met. Policy ST38 is not about allocating sites, therefore, there is no need to consider whether an area of land has the “least environmental or amenity value.” Policy ST38 is explicit that if development reflects local landscape and character it may be acceptable within or adjoining a Green Gap.</p>
<p>Representation Reference: NRF-REF006.3</p> <p>Name: Barton Wilmore on behalf of Howard (Retford) Ltd</p>	<p>Refers to: POLICY ST38: Green Gaps</p>	<p>Legal compliance and soundness: Not specified</p>	<p>Comments: Object to the principle of the designation of Green Gaps within the Local Plan, in particular land covering Green Gap 8 to the South of Retford.</p>	<p>Suggested changes: Remove the Green Gap land designation and policy from the Local Plan.</p>	<p>Officer comments: The Green Gaps have been defined based on the emerging policy context, recognising existing commitments and emerging allocations around settlements. The landscape to the South of Retford is distinctive comprising north-south running ridge or plateau, with extensive views in all directions and the slopes and bottom of the River Idle valley. It provides a countryside setting, with access opportunities, for the Retford housing areas of;</p>

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
					<p>Ordsall, South Retford, Thrumpton & White Houses and it is a rural setting for the village of Eaton. Whilst it may be justifiable to examine the details of the Green Gap where it adjoins the built up area and/or to consider if well planned and landscaped residential development may be appropriate, Policy ST38 is explicit that if development reflects local landscape and character it may be acceptable within or adjoining a Green Gap. As such there is no justification for the removal of Green Gap 8 in its entirety.</p>

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name: Representation Reference: REF001.4 Name: Canal and River Trust	Refers to: POLICY ST39: Green and Blue Infrastructure	Legal compliance and soundness: Plan is legally compliant. Plan complies with the Duty to Cooperate. Plan is sound.	Comments: Specific reference given to 'Blue Infrastructure' would make it clearer to decision makers that this section refers to watercourses and canals as well as other areas of green space. Policy ST39, should help to ensure that future development takes account of the unique biodiversity and function of waterway corridors in the district, which would make the Local Plan effective in meeting the requirements of section 15 of the NPPF	Suggested changes: None.	Officer comments: Noted.
Representation Reference: REF014.12 Name: National Trust	Refers to: POLICY ST39: Green and Blue Infrastructure	Legal compliance and soundness: Legal compliance - not specified. Plan is sound. Compliance with Duty to Co-operate - not specified.	Comments: N/A	Suggested changes: None.	Officer comments: Noted.
Representation Reference: REF021.6 Name: Sport England	Refers to: POLICY ST39: Green and Blue Infrastructure	Legal compliance and soundness: The plan is legally compliant, sound and complies with the Duty to Cooperate.	Comments: The policy is supported.	Suggested changes: None.	Officer comments: Noted.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
<p>Representation Reference: REF046.3</p> <p>Name: J G Pears</p>	<p>Refers to: POLICY ST39: Green and Blue Infrastructure</p>	<p>Legal compliance and soundness: Plan is legally compliant and complies with Duty to Cooperate.</p> <p>Plan is unsound.</p>	<p>Comments: Object to the reference in Criterion 2 (c) to a 'buffer zone' specifically to development within the specified zones of minimum distance.</p>	<p>Suggested changes: Criterion 2 (c) should be reworded: <i>'All proposals wholly or partly within the minimum buffer zone of a main green corridor (30m width) or a minor green corridor (15m width), should be supported by an Ecological Impact Assessment and a Landscape and Visual Impact Assessment. The Assessment should demonstrate how the proposals have minimised the environmental affect of development upon the identified green corridors'.</i></p>	<p>Officer comments: Policy ST39 identifies the minimum buffer zone considered appropriate for habitats to function, a landscape to be recognised and/or to provide functional space for access and recreation. The buffer zones are also seen as a design tool to ensure that the development positively responds to local context, the features of the green corridor and the nature of the proposal. The assessments identified by Policy ST39 have two purposes: to confirm the extent of the buffer zone, thereby demonstrating that the development positively responds to biodiversity/landscape and/or recreational value at that point in the corridor; and, to ensure that the impacts of proposal on the corridor is minimised.</p>

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name: Representation Reference: 1935133.2 Name: Sheffield City Council	Refers to: POLICY ST40: Biodiversity and Geodiversity	Legal compliance and soundness: Legal compliance - not specified. Plan is unsound. Plan does not comply with Duty to Co-operate.	Comments: N/A	Suggested changes: The policy should include the need to protect biodiversity against the threats and risks from pests, diseases and invasive non-native species.	Officer comments: Protection of biodiversity from the threats and risks from pests, diseases and invasive non-native species is not a requirement in the NPPF or the PPG.
Representation Reference: REF001.5 Name: Canal and River Trust	Refers to: POLICY ST40: Biodiversity and Geodiversity	Legal compliance and soundness: Plan complies with the Duty to Cooperate. Plan is legally compliant. Plan is sound.	Comments: The Chesterfield Canal is an SSSI within the District. Consideration given towards the protection of SSSI habitats within policy ST40 should help ensure that consideration is given towards the protection of such habitats.	Suggested changes: Opportunities exist for new development to provide for net improvements to biodiversity in line with the NPPF, reference to this in Policy ST40 could assist in ensuring these aims are met.	Officer comments: Policy ST40 3 and 4 appropriately refer to biodiversity net gain.
Representation Reference: REF014.13 Name: National Trust	Refers to: POLICY ST40: Biodiversity and Geodiversity	Legal compliance and soundness: Legal compliance of plan - not specified. Plan is unsound. Compliance with Duty to Co-	Comments: Welcome proposed biodiversity net gain requirements by Parts 3 and 4. Policy ST40 ought to be more flexible to take account of emerging government legislation and policy e.g. the policy states that 'all new development should make provision' and that this ought to include 'a commuted sum equivalent to 30 years maintenance'. Does this align with the	Suggested changes: Review emerging legislation and policy relating to biodiversity net gain to clarify requirements, and/or introduce flexibility to make allowances for any uncertainty around the detailed requirements of national legislation/policy.	Officer comments: It is considered that Policy ST40 is in accordance with the relevant requirements of the Environment Act 2021. This includes the requirement that habitats should be secured for a minimum of 30 years via planning obligations.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
		operate - not specified	government's intentions around different types of planning applications and different scales of development?		
Representation Reference: REF029.3 Name: IDP Planning on behalf of land owner (Lidl GB Ltd)	Refers to: Policy ST40: Biodiversity & Geodiversity – page 150. Points 3. And 4.	Legal compliance and soundness: Plan is legally compliant and complies with the Duty to Cooperate. Plan is unsound.	Comments: Object to criterion (3) & (4). 10% Biodiversity net gain on all new development would reduce developable area and add costs affecting viability, particularly if the site was previously developed. The requirement has not been factored into Viability Assessment. The approach is arbitrary and offers little flexibility for consideration of site characteristics or viability. Reference to a 10% net biodiversity requirement should be removed, and Policy ST40 amended to reflect the NPPF (2021) in order to provide flexibility. The requirement for a commuted sum equivalent to 30 years maintenance is not justified, would add cost to a development and may duplicate on-site maintenance carried out by developer. Maintenance of landscaping would be carried out by the future occupier / owner of the site; it is an on-going maintenance cost which they should incur. The cost	Suggested changes: The following wording should replace Criteria (3) and (4) of Policy ST40: "All new development should seek to promote opportunities for securing net biodiversity gains preferably on site, or where it can be demonstrated that for design reasons this is not practicable, off site through a financial contribution".	Officer comments: It is considered that Policy ST40 is in accordance with the relevant requirements of the Environment Act 2021. This includes the requirement that habitats should be secured for a minimum of 30 years via planning obligations. It is expected that the requirement will come into force in November 2023. So that the Local Plan does not become out of date Policy ST40 includes the requirement. It is considered that the assumptions used in the Whole Plan Viability Assessment 2022 relating to biodiversity net gain are appropriate, and demonstrate that net gain can be achieved as part of a financially viable scheme, on greenfield and brownfield

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			of management of a site used to achieve biodiversity enhancement should fall on the public purse in the same way as public open space provision on housing developments that may be adopted by a Council.		land. Maintenance arrangements of landscaping and open space provided by development are considered at planning application stage. The Council does not adopt new space. It would be for the developer to agree the parameters of future management agreements.
Representation Reference: REF035.8 Name: Home Builders Federation	Refers to: POLICY ST40: Biodiversity & Geodiversity	Legal compliance and soundness: Plan is legally compliant and complies with the Duty to cooperate. Plan is unsound	Comments, Bullet Point 3: should not deviate from the Government's 10% net gain for biodiversity. It provides certainty in achieving environmental outcomes, deliverability of development and costs for developers. The prefix "at least" should be deleted from Policy ST40 Bullet Point 3. Should not require "all development" to deliver biodiversity net gain. Proportionality should be applied so that sites without reasonable opportunities to achieve biodiversity net gain do not face delay through rigid or prescriptive requirements. The Environment Bill, introduces a transition period of two years. Transitional arrangements should be incorporated into Policy ST40 Bullet Point 3. The Viability	Suggested changes: The prefix "at least" should be deleted from Policy ST40 Bullet Point 3. Should not require "all development" to deliver biodiversity net gain. Transitional arrangements should be incorporated into Policy ST40 Bullet Point 3. Before submission, further viability sensitivity testing work should be undertaken.	Officer comments: Policy ST40 does not specify a requirement above 10% for net gain; consistent with the Environment Act it requires a minimum 10%. Consistent with the Environment Act biodiversity net gain will apply to all development for which planning permission is deemed to be granted under the Town and Country Planning Act (TCPA) 1990. Part 6 of the Environment Act 2021 is expected to come into force in November 2023. So that the Local Plan does not become out of date Policy ST40 includes the requirement. It

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			Assessment includes a cost £500 per dwelling for Policy ST40. Before submission, further viability sensitivity testing work should be undertaken.		is considered that the assumptions used in the Whole Plan Viability Assessment 2022 relating to biodiversity net gain are appropriate, and demonstrate that net gain can be achieved as part of a financially viable scheme.
Representation Reference: REF039.3 Name: Natural England	Refers to: POLICY ST40: Biodiversity and Geodiversity	Legal compliance and soundness: Plan is Legally Compliant and complies with the Duty to Cooperate. Soundness - not specified.	Comments: Support this policy as it provides a comprehensive policy framework for the protection and enhancement of biodiversity and geodiversity in Bassetlaw District and it has incorporated recent policy initiatives from the government's 25-year Environment Plan, such as the Nature Recovery Network. Welcome the explanation regarding Biodiversity Net Gain set out in the policy and accompanying text. Welcome bullet point (c) regarding appropriate mitigation measures to protect Clumber Park SSSI from additional recreational disturbance. Require commitment that the recommended mitigation in the draft Recreational Impact Assessment will be implemented.	Suggested changes: None	Officer comments: The May 2022 Second Addendum withdraws the Garden Village; this was considered by Natural England to be the driver for the recreational impact assessment and the recommended mitigation. Consequently, the May 2022 Second Addendum amended Policy ST40 (and deleted Policy ST40A introduced to address this matter in the January 2022 Addendum), in accordance with Natural England's advice. The content of the recreational impact assessment has been agreed through discussions with partners including Natural England and forms

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
					part of the Local Plan evidence base. This is evidenced by a statement of common ground.

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name: Representation Reference: 1945119.1 Name: The Woodland Trust	Refers to: POLICY 41: Trees, woodlands and hedgerows	Legal compliance and soundness: Legal compliance of plan - not specified. Plan is unsound. Compliance with Duty to Co-operate - not specified.	Comments: Welcome the strong protection given to ancient woodland and ancient/veteran trees in the Trees and Woodland policy (41). This is in line with national policy and specifically para 175c of the NPPF, which says that any damage to ancient woodland or ancient trees due to development must be wholly exceptional.	Suggested changes: None	Officer comments: Noted
Representation Reference: REF014.14 Name: National Trust	Refers to: POLICY 41: Trees, woodlands and hedgerows	Legal compliance and soundness: Legal compliance of plan - not specified. Plan is sound. Compliance with Duty to Co-operate - not specified.	Comments: None	Suggested changes: None	Officer comments: Noted
Representation Reference: REF044.3 Name: Churchill Retirement Living	Refers to: POLICY 41: Trees, woodlands and hedgerows	Legal compliance and soundness: Plan is legally compliant and sound Compliance with Duty to Co-	Comments: Note that there is a requirement in e) for contributions to the national tree planting target to contribute to net zero emissions in accordance with Policy ST50. This contribution to tree planting is open-ended and there are no details on how it	Suggested changes: Policy ST41: A) Clarify how the tree planting contribution in sub-clause e) will be applied	Officer comments: Clarification on the application of tree planting contributions is provided in paragraph 10.1.14 of the Plan. Financial contribution to

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
		operate - not specified.	is to be applied. The aim of tree planting standards is a long-term increase in tree cover, which could be an impediment to building at higher densities on previously developed sites in urban areas. It reduces greenfield land-take.	B) Balance the sustainability benefits of efficiently redeveloping previously developed land against those of increasing tree cover in urban area.	deliver tree planting will based on 5 trees per new dwelling or per 1000sqm of non-residential floorspace for the first 5 years of the Plan, as identified by the Infrastructure Delivery Plan. This equates to approximately 38,552 trees or 192,760 carbon tonnes absorbed a year once complete. In terms of tree planting being an impediment to building at higher densities on previously developed land in urban areas the requirements will depend on site characteristics, constraints and design- to be considered on a case by case basis during planning application process.

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name: Representation Reference: REF001.6 Name: Canal and River Trust	Refers to: POLICY ST42 The Historic Environment and paragraph 8.8.2	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: Due to its age, the presence of historic structures, and its relationship with past industrial development in Worksop and Retford, the Chesterfield Canal does constitute a heritage asset, which contributes toward the character and setting of the district. The inclusion of the canal and its associated structures within paragraph 8.8.2 should make it clear to decision makers that the canal should be considered as a heritage asset. Policy ST37 should help make the Local Plan effective in meeting the aspirations set out in section 16 of the NPPF.	Suggested changes: N/A	Officer Comments: Noted.
Representation Reference: REF014.15 Name: National Trust	Refers to: POLICY ST42: The Historic Environment	Legal compliance and soundness: Legal compliance: not specified. Plan is sound. Compliance with Duty to Co-operate: not specified.	Comments: N/A	Suggested changes: N/A	Officer comments: Noted.
Representation Reference: REF049.1 Name: Historic England	Refers to: POLICY ST42: The Historic Environment	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: Further to Historic England's previous concerns in relation to the approach of the Plan to the historic environment we welcome the updated Site Assessment (historic environment) methodology of July 2021 (CD-	Suggested changes: N/A	Officer comments: Noted.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
		Plan complies with Duty to Co-operate.	010) which addresses concerns previously raised.		

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Representation Reference: REF014.16 Name: National Trust	Refers to: POLICY 43: Designated and Non-Designated Heritage Assets	Legal compliance and soundness: Legal compliance: not specified. Plan is sound. Compliance with Duty to Co-operate: not specified.	Comments: None	Suggested changes: None	Officer comments: Noted.

Healthy Communities

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Representation Reference: REF001.7 Name: Canal and River Trust	Refers to: POLICY ST44: Promoting Healthy, Active Lifestyles	Legal compliance and soundness: Plan complies with the Duty to Cooperate. Plan is legally compliant. Plan is sound.	Comments: Policy seeks to increase opportunities for access to leisure facilities and for walking and cycling. Our network can play an important part in ensuring that future (and existing) residents can benefit from access to such facilities, which could assist in promoting healthy lifestyles. Inclusion of towpaths within part 1 e) makes it explicit that our network forms part of the wider network of spaces for active leisure, including walking and cycling. The Trust would encourage such use of our network.	Suggested changes: None.	Officer comments: Noted.
Representation Reference: REF021.7 Name: Sport England	Refers to: POLICY ST44: Promoting Healthy, Active Lifestyles	Legal compliance and soundness: Plan complies with the Duty to Cooperate. Plan is legally compliant. Plan is sound.	Comments: The policy is supported.	Suggested changes: None.	Officer comments: Noted.
Representation Reference: REF044.4 Name: Churchills	Refers to: POLICY ST44: Promoting Healthy, Active Lifestyles	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: Welcome the commitment to the health and wellbeing of its residents. The demographic profile of the District is ageing with a requirement for 3,000 units of specialist older persons' accommodation over the Plan period. An ageing population	Suggested changes: As a suggestion we would recommend an additional sub-clause to the policy which reads as follows:	Officer comments: Policy ST44 aims to create an environment which supports healthy, active, inclusive and safe communities for all within Bassetlaw, regardless of

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Retirement Living			inevitably results in an increase in frail individuals and persons with long-term health issues and commensurate pressure on care and health services with many local authorities spending over a third of their budgets on adult social care currently. The aspirations to improve the health and wellbeing of its residents is commendable and are strongly of the view that increasing the delivery of specialist older persons' housing is aligned with this objective.	i Ensure that the needs of the District's ageing population are addressed, and that older people have increased access to support, care, companionship, and appropriate accommodation.	age, sex, gender, race or socio economic background. All proposals should be considered against all relevant Local Plan policies so it is not considered necessary to include the proposed change in Policy ST44.
Representation Reference: NRF-REF014.11 Name: East Markham Parish Council	Refers to: Cycle Paths	Legal compliance and soundness: Not specified	Comments: The use of cycling as a mode of transport is frequently identified. The local cycle network is inadequate: It is neither joined up, extensive or maintained. In Retford, most of the cycle lanes are taken by residential parking endangering cyclists overtaking parked cars. A strong and maintained cycle network, connecting the residential areas of Blyth, Carlton in Lindrick, Langold, Misterton, and Tuxford, to the main towns of Retford, Worksop and Harworth should be a priority for a progressive and green strategic plan. Disused railways lines and canal paths could be enhanced/repurposed as commuting and leisure routes, improving healthy lifestyles of local people and tourism. National Cycle Network Routes	Suggested changes: A strong and maintained network of cycle paths, connecting the key residential areas of Blyth, Carlton in Lindrick, Langold, Mister ton and Tuxford, to the main three towns of Retford, Worksop and Harworth should be a major priority for any progressive and green strategic plan.	Officer comments: The Local Plan can only address the impacts from growth expected to be delivered over the plan period. Policy ST44 promotes opportunities to increase movement through a well-connected network of sustainable travel routes, rights of way and towpaths, and Policy ST55 provides the framework for securing well-designed, safe and convenient cycle access from major development.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			such as NCN 647 and NCN 6 should be looked at for improvements.		

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Representation Reference: REF021.8 Name: Sport England	Refers to: POLICY ST45: Protection and Enhancement of Community Facilities	Legal compliance and soundness: The plan is considered legally compliant, sound and complies with the Duty to Cooperate.	Comments: The policy is supported.	Suggested changes: None	Officer comments: Noted.

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name:					
Representation Reference: REF021.9 Name: Sport England	Refers to: POLICY ST46: Delivering Quality, Accessible Open Space	Legal compliance and soundness: Plan is legally compliant, sound and complies with the Duty to Cooperate.	Comments: The policy is supported.	Suggested changes: N/A	Officer comments: Noted.
Representation Reference: REF048.19 Name: Nottinghamshire County Council	Refers to: POLICY ST46: Delivering Quality, Accessible Open Space	Legal compliance and soundness: Not specified	Comments: Should include adequate provision for car and cycle parking where the facilities are likely to attract visitors from beyond the development or immediate local area.	Suggested changes: Add to policy: "Proposals should provide adequate provision for car and cycle parking where the facilities are likely to attract visitors from beyond the development"	Officer comments: All proposals should be considered against all relevant Local Plan policies so it is not considered necessary to include the proposed change in Policy ST46 as provision of appropriate levels of car and cycle parking is addressed by Policy ST35.
Representation Reference: NRF-REF014.12 Name: East Markham Parish Council	Refers to: Policy ST46: Delivering Quality, Accessible Open Space	Legal compliance and soundness: Not specified	Comments: Where developments are planned, adequate off street parking must be provisioned, far too much parking on pavements discourages walking and endangers local residents who are often forced to walk in the roads.	Suggested changes: Require off-street parking to be appropriate for the needs of households	Officer comments: All proposals should be considered against all relevant Local Plan policies so it is not considered necessary to include the proposed change in Policy ST46 as provision of appropriate levels of car and cycle parking is addressed by Policy ST35.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Representation Reference: REF021.10 Name: Sport England	Refers to: POLICY ST47: Promoting Sport and Recreation	Legal compliance and soundness: Plan is legally compliant, sound and complies with the Duty to Cooperate.	Comments: The policy is supported.	Suggested changes: None	Officer comments: Noted.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Representation Reference: REF001.8 Name: Canal and River Trust	Refers to: POLICY 49: Contaminated and Unstable Land	Legal compliance and soundness: Plan complies with the Duty to Cooperate. Plan is legally compliant. Plan is sound.	Comments: Development upon contaminated or unstable land in proximity to our waterways could subject them to contamination or structural damage, which could threaten the ability of our network to provide a resource for the local community. Account for these hazards in the Local Policy, as proposed, would help protect our network, and help make the Local Plan more effective in meeting the aims of paragraph 183 from the NPPF.	Suggested changes: None.	Officer comments: Noted.
Representation Reference: REF010.11 Name: Severn Trent	Refers to: POLICY 49: Contaminated and Unstable Land	Legal compliance and soundness: Legal compliance of plan - not specified. Soundness of plan - not specified. Compliance of plan with Duty to Co-operate - not specified.	Comments: Supportive of the principles outlined within Policy 49, but note that bullet point a) reference waterways which would usually only apply to canals and navigable rivers, it is also important that all watercourses and sources of groundwater are protected from contamination.	Suggested changes: Recommend that point (a) references waterways, watercourses groundwater and the environment, to ensure that these key resources are protected.	Officer comments: It is acknowledged that a proposed suggested change to Policy 49 a) would add clarity as: ensure that all works, including investigation of the nature of any contamination or land instability, and removal of materials can be undertaken without causing unacceptable risk to health, waterways, other watercourses and sources of

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
					groundwater, or to the environment

Greening Bassetlaw

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name: Representation Reference: 1935142.1 Name: Sheffield City Council	Refers to: 10.0 Greening Bassetlaw	Legal compliance and soundness: Legal compliance - not specified. Plan is sound. Plan complies with Duty to Co-operate.	Comments: Further mention of Climate Change through the document	Suggested changes: None	Officer comments: Climate change is a wide ranging area and is considered throughout the Plan, including: the vision, objectives and by a number of policies including in section 10 relating to climate change, renewable energy generation, flood risk and water quality.
Representation Reference: REF010.9 Name: Severn Trent	Refers to: Paragraph 10.1.8	Legal compliance and soundness: Legal compliance of plan - not specified. Soundness of plan - not specified. Compliance of plan with Duty to Co-operate - not specified.	Comments: Support the implementation of BREEAM for employment allocations, such that they incorporate sustainable construction methods and implement water efficiency and water re-use.	Suggested changes: None	Officer comments: Noted.
Representation Reference: REF010.12	Refers to: POLICY ST50: Reducing Carbon Emissions,	Legal compliance and soundness: Legal compliance of plan - not specified.	Comments: Support the principles within Policy 50, in particular the approach to require development to meet BREEAM very-good excellent standards and the use of the	Suggested changes: None	Officer comments: Noted.

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name: Name: Severn Trent	Climate Change Mitigation and Adaptation	Soundness of plan - not specified. Compliance of plan with Duty to Co-operate - not specified.	tighter optional water efficiency requirement within residential developments and promotion of rainwater harvesting for non-potable water supply.		
Representation Reference: REF014.17 Name: National Trust	Refers to: POLICY ST50: Reducing Carbon Emissions, Climate Change Mitigation and Adaptation	Legal compliance and soundness: Legal compliance of plan - not specified. Plan is sound. Compliance with Duty to Co-operate - not specified.	Comments: None	Suggested changes: None	Officer comments: Noted
Representation Reference: REF025.3 Name: Resident	Refers to: POLICY ST50: Reducing Carbon Emissions, Climate Change Mitigation and Adaptation	Legal compliance and soundness: Plan is legally compliant. Plan is sound. Plan complies with Duty to Co-operate.	Comments: The proposal to build a road across Peaks Hill to connect Blyth Road and Carlton Road will increase the pollution from noise and fumes in this area. Councils are supposed to be implementing measures to reduce the impact on Climate change and pollution and this is not in accordance with that approach.	Suggested changes: None	Officer comments: The new road link through the site is to provide access and improve the flow of traffic within the wider area. Improving the flow of traffic will help to reduce traffic congestion in the area overall,

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name:					therefore reducing air pollution.
Representation Reference: REF026.3 Name: Resident	Refers to: POLICY ST50: Reducing Carbon Emissions, Climate Change Mitigation and Adaptation	Legal compliance and soundness: Plan is legally compliant. Plan is sound. Plan complies with Duty to Co-operate.	Comments: The proposal to build a road across Peaks Hill to connect Blyth Road and Carlton Road will increase the pollution from noise and fumes in this area. Councils are supposed to be implementing measures to reduce the impact on Climate change and pollution and this is not in accordance with that approach.	Suggested changes: None	Officer comments: The new road link through the site is to provide access and improve the flow of traffic within the wider area. Improving the flow of traffic will help to reduce traffic congestion in the area overall, therefore reducing air pollution.
Representation Reference: REF027.3 Name: Resident	Refers to: POLICY ST50: Reducing Carbon Emissions, Climate Change Mitigation and Adaptation	Legal compliance and soundness: Plan is legally compliant. Plan is sound. Plan complies with Duty to Co-operate.	Comments: The proposal to build a road across Peaks Hill to connect Blyth Road and Carlton Road will increase the pollution from noise and fumes in this area. Councils are supposed to be implementing measures to reduce the impact on Climate change and pollution and this is not in accordance with that approach.	Suggested changes: None	Officer comments: The new road link through the site is to provide access and improve the flow of traffic within the wider area. Improving the flow of traffic will help to reduce traffic congestion in the area overall, therefore reducing air pollution.
Representation Reference: REF029.4	Refers to: POLICY ST50: Reducing Carbon Emissions,	Legal compliance and soundness: Plan is legally compliant and complies with the	Comments: Still has concerns with criterion (d) within part (1) of Policy ST50. The policy seeks as follows: 1.“(d) requiring compliance with relevant national building standards such as	Suggested changes: Greater flexibility incorporated into Policy ST50 to allow for consideration of other	Officer comments: It is considered that a proposed suggested change to Policy ST50 will ensure flexibility in

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name: IDP Planning on behalf of land owner (Lidll GB Ltd)	Climate Change, Mitigation and Adaptation Point 1. Section d)	Duty to Cooperate. Plan is unsound.	meeting BREEAM very good-excellent standards,” Criterion (1)(d) continues to provide limited flexibility in the application of BREEAM and the potential to adopt other measures demonstrating that sustainable development can be achieved. Does not provide sufficient flexibility in criterion (1)(d) for scenarios where delivery of BREEAM or other sustainable design standards are not viable. The policy does not go far enough to ensure that development is ‘deliverable’ under its application. It is not ‘positively’ prepared and as is stands, the Plan is not “sound”.	alternative sustainable design measures to ensure that the plan is successful in allowing development to be deliverable as below: “Requiring compliance with relevant national building standards such as meeting BREEAM very good-excellent standards or equivalent”. Would ensure consistency with the NPPF (2021) paragraph 16 and paragraph 35.	achieving sustainable design standards as follows: All new non residential development of 1000 sqm floorspace or more will be required to meet the must-be designed to comply with relevant national sustainability building standards such as meeting BREEAM very good-excellent standards or equivalent for relevant residential or non-residential development.
Representation Reference: REF035.9 Name: Home Builders Federation	POLICY ST50: Reducing Carbon Emissions Climate Change Mitigation & Adaptation	Plan is legally compliant and complies with the Duty to cooperate. Plan is unsound	Comments: Bullet Point 1(d) is ambiguous. The Council should clarify that “ <i>relevant national building standards</i> ” means the Building Regulations. Bullet Points 1(g) is ambiguous and its inter-relationship with Bullet Point 1(d) , 2021 Part L Interim Uplift and the Future Homes Standards is unclear. Financial contributions to a carbon offsetting fund should not be necessary. Policy ST50 Bullet Point 1(f) , all proposals should seek to reduce carbon and energy impacts by providing for electric vehicle charging capability and charging infrastructure in new	Suggested changes: Policy ST50 Bullet Points 1(d), 1(f), 1(g) & 2(d) are unsound and fail the tests of soundness. Policy ST50 Bullet Points 1(d), 1(f), 1(g) & 2(d) are not positively prepared, justified, effective and consistent with national policy. Policy ST50 Bullet Points 1(d), 1(f), 1(g) & 2(d) should be	Officer comments: It is considered that the following proposed suggested changes to Policy ST50 clarify the approach: 1d) All new non residential development of 1000 sqm floorspace or more will be required to meet the must-be designed to comply with relevant national sustainability building

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>development. There is an inconsistency between Policy ST50 Bullet Point 1(f) and the Nottinghamshire Parking Standards 2020 (Document EX-010) Table T4.1.4 requirement for 1 fast charge socket per dwelling for houses / apartments with allocated parking. Policy ST50 Bullet Point 1(f) should be clearer in specifying a passive cable & duct approach and not the installation of active EVCPs. Policy ST50 Bullet Point 2(d) promotes water efficiency by requiring residential development to meet the tighter Building Regulations optional requirement of 110 litres per person per day.</p>	<p>deleted or modified as outlined above.</p>	<p>standards such as meeting BREEAM very good-excellent standards or equivalent for relevant residential or non-residential development. 1g) Whilst the Government have introduced the interim Part L change, no definitive date has been given for introducing the Future Homes standard. It is considered that 1(g) remains necessary to help reduce the impacts of climate change from new development. 1f) Where new development requires the need for parking space(s), provision should include a passive cable & duct suitable for charging providing for electric vehicles, including buses where appropriate charging capability and charging infrastructure in new development, and/or providing infrastructure</p>

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
					that supports car-free living, particularly in town centres; 2d) The optional requirement relating to water efficiency at 2d is a requirement of statutory consultees Anglian Water and Severn Trent and is justified by 10.1.20-10.1.24.
Representation Reference: REF47.9 Name: Welbeck Estates	Refers to: POLICY ST50: Reducing Carbon Emissions, Climate Change Mitigation and Adaptation	Legal compliance and soundness: Plan is legally compliant and complies with Duty to Cooperate. Plan is Unsound.	Comments: Consideration must be given in the policy to the specific conditions and limitations presented within rural Bassetlaw to deliver the policy requirements via conventional means. Heritage and landscape constraints are just two potential reasons. Must be written subject to the proof that they can be viably and practically delivered in the specific context of the proposals concerned. There must be an ability in the policy wording for the applicant to demonstrate if such conditions are unsuitable to deliver the policy aspirations (in part or full).	Suggested changes: Should include the specific conditions and limitations presented within rural Bassetlaw to deliver the means of the policy requirements. The policy wording must allow for the applicant to demonstrate if such conditions are unsuitable to deliver the policy aspirations.	Officer comments: Policy ST50 brings together the principles of legislation and national guidance and interprets them at a Bassetlaw scale whilst also identifying more localised policy requirements. It is considered that the assumptions used in the Whole Plan Viability Assessment 2022 relating to Policy ST50 is appropriate. However, it is considered that a proposed suggested change to Policy ST50 1) will ensure flexibility in achieving climate change

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
					mitigation and adaptation as follows: 1) All new development should be designed to improve resilience to the anticipated effects of climate change taking into account the design principles in the Bassetlaw Design Quality SPD and the Bassetlaw Design Code. Proposals should incorporate, where appropriate, the following measures that address issues of mitigation and adaptation to climate change through:
Representation Reference: REF048.20 Name: Nottinghamshire County Council	Refers to: POLICY ST50: Reducing Carbon Emissions, Climate Change Mitigation and Adaptation	Legal compliance and soundness – not specified. Compliance with Duty to Co-operate – not specified.	Comments: The policy should include the need for the provision of the infrastructure for the charging of electric buses.	Suggested changes: Add to policy: “j) providing for electric vehicle charging capability and charging infrastructure for buses where appropriate;”	Officer comments: Agree to the proposed suggested change, which is proposed as Where new development requires the need for parking space(s), provision should include a passive cable & duct suitable for charging providing for electric vehicles, including buses where appropriate charging capability and

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
					charging infrastructure in new development , and/or providing infrastructure that supports car-free living, particularly in town centres;
Representation Reference: NRF-REF014.15 Name: East Markham Parish Council	Refers to: POLICY ST50: Reducing Carbon Emissions, Climate Change Mitigation and Adaptation	Legal compliance and soundness: Legal compliance and soundness – not specified. Compliance with Duty to Co-operate – not specified.	Comments: Concern over recent developments within the village and the lack of renewable or low carbon technology within those developments.	Suggested changes: None	Officer comments: Noted.

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name: Representation Reference: REF014.18 Name: National Trust	Refers to: POLICY ST51: Renewable and Low Carbon Energy Generation	Legal compliance and soundness: Legal compliance - not specified. Plan is sound. Compliance with Duty to Co-operate - not specified.	Comments: N/A	Suggested changes: N/A	Officer comments: Noted.
Representation Reference: REF046.4 Name: J G Pears	Refers to: POLICY ST51: Renewable and Low Carbon Energy Generation	Legal compliance and soundness: Plan is legally compliant and complies with Duty to Cooperate. Plan is unsound.	Comments: An OBJECTION is submitted to Policy ST51 for wording that supports renewable and low carbon energy generation 'is subject to' i.e., it is a material consideration in determining the merits of an application for the Applicant to provide 'details of expected power generation based on yield or local self-consumption of electricity'. This is inconsistent with national planning policy para 158: 'When determining planning applications for renewable and low carbon development, local planning authorities should: a) not require applicants to demonstrate the overall need for renewable or low carbon energy, and recognise that even small-scale projects provide a valuable	Suggested changes: Omit the words: <i>'subject to the provision of details of expected power generation based upon yield or local self-consumption of electricity'.</i> Replace: <i>'by demonstrating satisfactory resolution of all wider impacts (including cumulative impacts)'</i> with: <i>'by ensuring no unacceptable impacts (including cumulative impacts)'.</i>	Officer comments: The January 2022 Addendum amended Policy ST51. It is considered that this addresses the matters raised. Provision of the expected power regeneration is required only to enable effective monitoring of the district's contribution to net zero carbon targets.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p><i>contribution to cutting greenhouse gas emissions'</i>. This introduces an inappropriate test for applicants to justify investment in renewable and low carbon energy generation. The 'subject to' introduces substantial uncertainty to a developer as to whether the principle of development is supported which will frustrate new investment. It is acknowledged that not all renewable and low carbon energy generation will be acceptable. A planning balance has to be formed between the benefits and the effects of the development on other planning interests. Replace 'by demonstrating satisfactory resolution of all wider impacts (including cumulative impacts) with by ensuring no unacceptable impacts (including cumulative impacts)'. The benefits may not be confirmed to power generation, and may include new technologies that are highly innovative – where say the technical performance has not been proven at a commercial scale. High Marnham would provide a suitable location for these new technologies to become established subject to wider impacts being acceptable. As with all developments there may be some residual adverse impacts which are</p>		

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>outweighed by the overall benefits of the individual proposal. Paragraph 10.23 should not imply that the provision of renewable energy at High Marnham is confined to technologies that require a connection into the high voltage grid. High Marnham has the potential for a range of renewable energy technologies to be developed in generation, sharing transmission and storage. These forms of technology could be electrical, thermal or gaseous.</p>		
<p>Representation Reference: REF47.10</p> <p>Name: Welbeck Estates</p>	<p>Refers to: POLICY ST51: Renewable and Low Carbon Energy Generation</p>	<p>Legal compliance and soundness: Plan is legally compliant and complies with Duty to Cooperate.</p> <p>Plan is Unsound.</p>	<p>Comments: Consideration must be given in the policy to the specific conditions and limitations within rural Bassetlaw to deliver the policy requirements via conventional means. Heritage and landscape constraints are two potential reasons. Must be written subject to the proof that they can be viably and practically delivered in the specific context of the proposals concerned. There must be an ability for the applicant to demonstrate if such conditions are unsuitable to deliver the policy aspirations (in part or full). This would ensure the policy is: Positively prepared, Justified, Effective</p>	<p>Suggested changes: The Policies should include the specific conditions and limitations presented within rural Bassetlaw to deliver the means of the policy requirements.</p> <p>There must be an ability in the policy wording for the applicant to demonstrate if such conditions are unsuitable to deliver the policy aspirations.</p>	<p>Officer comments: The January 2022 Addendum amended Policy ST51. It is considered that this addresses the matters raised. Provision of the expected power regeneration is required only to enable effective monitoring of the district's contribution to net zero carbon targets.</p>

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Representation Reference: NRF-REF015.1 Name: Lanpro	Refers to: POLICY ST51: Renewable and Low Carbon Energy Generation	Legal compliance and soundness: Not specified	Comments: Policy ST51 accords with paragraph 155 of the National Planning Policy Framework and the principle is supported. The proposed policy ST51 on renewable and low carbon energy generation and its accompanying text are supportive and weighted positively towards the development of commercial scale renewable energy schemes (including ground mounted solar).	Suggested changes: None	Officer comments: Noted.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Representation Reference: REF001.10 Name: Canal and River Trust	Refers to: POLICY ST52: Flood Risk and Drainage	Legal compliance and soundness: Plan complies with the Duty to Cooperate. Plan is legally compliant. Plan is sound.	Comments: The Local Plan makes reference to the proposed River Ryton Flood Storage Area (e.g. Figure 31). The north east side of the Flood Storage area lies in proximity to the Chesterfield Canal. Stored water can impact land stability associated with existing retaining structures that support the canal in place. Advise that the relevant authority contacts the Trust before the development of proposals for the flood storage area so that the associated risks and any required mitigation works can be identified and designed into the scheme as appropriate.	Suggested changes: None	Officer comments: Noted.
Representation Reference: REF010.13 Name: Severn Trent	Refers to: POLICY ST52: Flood Risk and Drainage	Legal compliance and soundness: Legal compliance of plan - not specified. Soundness of plan - not specified. Compliance of plan with Duty to Co-operate - not specified.	Comments: Support the need to incorporate water management systems into all of the large developments mentioned in paragraph 10.3.9 and these developments incorporate SuDS, it is however also vital that these development consider the drainage Hierarchy so that controlled surface water flows are discharged to the most sustainable outfall	Suggested changes: None	Officer comments: Paragraph 10.3.8 states that SuDS should be developed in accordance with national standards. All proposals should be considered against all relevant Local Plan policies so it is not considered necessary to include reference to the drainage hierarchy as it is addressed more appropriately by Policy ST53. However, for clarity, modify the

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name:					supporting text to include a reference to Policy ST53.
Representation Reference: REF010.14 Name: Severn Trent	Refers to: POLICY ST52: Flood Risk and Drainage	Legal compliance and soundness: Legal compliance of plan - not specified. Soundness of plan - not specified. Compliance of plan with Duty to Co-operate - not specified.	Comments: Support the principles within policy ST52, and the need for SuDS as detailed in section 4, also note that point e highlights the need to prevent surface water discharge to the sewerage system and point g highlights the need to utilise sustainable outfalls. Point f details need to incorporate the SuDS with biodiversity and Amenity space, are supportive of this, and recommend that developers are directed the current industry best practice guidance The SuDS Manual (C753) to ensure that SuDS design meet the good quality standards of design.	Suggested changes: Recommend that the drainage hierarchy is mentioned for clarity on what is meant by a sustainable outfall.	Officer comments: All proposals should be considered against all relevant Local Plan policies so it is not considered necessary to include reference to the drainage hierarchy as it is explicitly addressed by Policy ST53. For clarity, reference to the SUDS Manual will be added to paragraph 10.3.8
Representation Reference: REF014.19 Name: National Trust	Refers to: POLICY ST52: Flood Risk and Drainage	Legal compliance and soundness: Legal compliance of plan - not specified. Plan is sound. Compliance with Duty to Co-operate - not specified.	Comments: None	Suggested changes: None	Officer comments: None

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name: Representation Reference: NRF-REF014.13 Name: East Markham Parish Council	Refers to: POLICY ST52: Flood Risk and Drainage	Legal compliance and soundness: Not specified	Comments: All new developments should refer to local town/parish councils for consultation relating to local concerns and historic flooding or drainage problems. In areas where existing drainage systems are old or inadequate, especially where sewage and rainwater share the same pipework, that new developments are only sanctioned where additional or enlarged drainage systems are provided by the developer and/or waste-water company. E.g. Severn Trent.	Suggested changes: Require planning consultations for new development to consult town and parish councils. Development proposals should only be approved where there is adequate sewage infrastructure in place.	Officer comments: Relevant town and parish councils are consultees for planning proposals within their area. The Local Planning Authority also seeks the opinion of the relevant water/drainage authorities where there is a likely impact to flooding, water management or drainage.
Representation Reference: NRF-REF029.1 Name: Resident	Refers to: POLICY ST52: Flood Risk and Drainage	Legal compliance and soundness: Not specified	Comments: Lived in Misterton my whole life on Albion Terrace. The Terrace leads onto Marsh Lane near to the railway bridge. When we have heavy or prolonged rain water pours out of the sewage manhole under the bridge and subsequently flood the road. Larger vehicles continue to come through which "pushes" the flood water down the lane to the rear of our properties consequently flooding them. Unable to use toilets which is unacceptable. Contact Seven Trent but it takes days for someone to come, in which time the water has subsided so there is nothing to see. The problem seems to be the pumping station on Marsh Lane which is unable to cope when there is a large volume of rain. Most of the	Suggested changes: None	Officer comments: The Local Plan is not proposing growth in Misterton.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>“Village” sewage comes to this pumping station so to build more new houses will only exacerbate the situation. Not against new builds, but the ongoing problem needs to be addressed first.</p>		

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name:					
Representation Reference: REF010.15 Name: Severn Trent	Refers to: Paragraph 10.4.1	Legal compliance and soundness: Legal compliance: not specified. Soundness: not specified. Compliance of plan with Duty to Co-operate: not specified.	Comments: Supportive of Paragraph 10.4.1 highlighting the need to protect Groundwater and surface water resources both of which are utilised to provide water to the Bassetlaw Area.	Suggested changes: None	Officer comments: Noted.
Representation Reference: REF010.16 Name: Severn Trent	Refers to: POLICY ST53: Protecting Water Quality and Management	Legal compliance and soundness: Legal compliance: not specified. Soundness: not specified. Compliance of plan with Duty to Co-operate: not specified.	Comments: Supportive of the need to meet the objectives of the Water Framework Directive and have an agreed programme of works with the Environment Agency across their region to ensure deliver fair share of water quality improvements. Supportive of Policy ST53 section 3 in relation to sewerage capacity and the need to connect foul flows to the public sewers where possible.	Suggested changes: None	Officer comments: Noted.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Representation Reference: REF014.20 Name: National Trust	Refers to: POLICY ST53: Protecting Water Quality and Management	Legal compliance and soundness: Legal compliance: not specified. Plan is sound. Compliance with Duty to Co-operate: not specified.	Comments: Supports this policy, however for the purposes of interpretation it appears that a drafting error needs to be corrected in Part 2.	Suggested changes: '2. Proposals within a Source Protection Zone will need to demonstrate that any risk to the Sherwood Sandstone Principle Aquifer and its groundwater resources and groundwater quality will be protected throughout the construction and operational phase of development.' Suggest that, the 'risk' needs to be 'mitigated', while the aquifer itself needs to be 'protected'.	Officer comments: It is considered that a proposed suggested change will clarify the approach in Policy ST53 2) as follows: Proposals within a Source Protection Zone will need to demonstrate that any risk to the Sherwood Sandstone Principle Aquifer and its groundwater resources and groundwater quality will be protected throughout the construction and operational phase of development, by demonstrating the satisfactory resolution of all relevant identified impacts.

Transport and Connectivity

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name: Representation Reference: 1935133.3 Name: Sheffield City Council	Refers to: POLICY ST54: Transport Infrastructure and Improvement Schemes	Legal compliance and soundness: Legal compliance not specified. Plan is sound. Plan complies with Duty to Co-operate.	Comments: In ST54 d), note the potential impact on the A57, which links into Sheffield, from increased development along the route, and the Improvement Plan for the A57 outlined in paragraph 11.1.7. Be keen to understand the scope of the Improvement Plan and the implications for the wider network where it feeds into Sheffield, as the A57 corridor is one of the routes in Sheffield which experiences regular congestion.	Suggested changes: None	Officer comments: Noted.
Representation Reference: REF014.21 Name: National Trust	Refers to: POLICY ST54: Transport Infrastructure and Improvement Schemes	Legal compliance and soundness: Legal compliance of plan not specified. Plan is unsound. Compliance with Duty to Co-operate not specified.	Comments: Do not consider that Policy ST54 is justified or effective. The Local Plan proposals as a whole will also render several highway links and junctions over capacity, necessitating mitigation measures whose cost, feasibility and environmental impacts have not been fully established. Have significant concerns about the scope and scale of interventions on the A57 corridor that would be necessitated by current Local Plan proposals.	Suggested changes: Suggest sensitivity analysis is carried out to understand the potential performance of the highway network when individual sites such as Apleyhead employment site and the Garden Village are excluded. As per response to Policy ST1 (See REF014.1), the Local Plan employment and housing targets should be revisited and revised down to a reasonable	Officer comments: The Bassetlaw Transport Study 2022, accepted by the Local Highways Authority has identified the traffic impact of relevant Local Plan site allocations and proportionate contribution towards mitigation including to address impacts upon the A57. The A57 Improvement Plan is a longer-term plan that will look at wider improvements to the link between the M1 and A1 in consultation with other relevant partners. The work programme and

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
				level. The sensitivity testing would then form part of the evidence base to inform which sites should be removed from the plan due to their poor performance against measures of sustainability.	timetable has been agreed with NCC and partners. The May 2022 Second Addendum withdraws the Garden Village from the Local Plan.
Representation Reference: REF 048.21 Name: Nottinghamshire County Council	Refers to: SECTION 11.0 Transport Infrastructure and Improvement Schemes	Legal compliance and soundness: Not specified	Comments: Paragraph 11.1.6 The Highway Authority would not normally require all development to be supported by a Travel Plan. For instance, the threshold for residential development is 80 dwellings. Paragraph 11.1.7 should now refer to National Highways rather than Highways England.	Suggested changes: Paragraph 11.1.7 should now refer to National Highways rather than Highways England.	Officer comments: The January 2022 Addendum amends Policy ST54 and the supporting text. It is considered that this addresses the matters raised.
Representation Reference: NRF-REF014.14 Name: East Markham Parish Council	Refers to: Policy ST54 points 2 & 3	Legal compliance and soundness: Not specified	Comments: These points are to be applauded but should be prioritized ahead of 'motor transport' forms of infrastructure plans, if Bassetlaw intend to really prioritise the green agenda and healthy and active lifestyles as well as improvement of air quality. Points a, b, c, e & f are primarily focused on cycle lane facilities within town centres rather than encouraging cycle and walking access to towns. East Markham Parish Council recognises the need for better transport infrastructure	Suggested changes: Include cycle infrastructure projects in the Plan.	Officer comments: Policy ST55 supports the provision and improvement of cycle infrastructure. Improvements to the cycling network required as a consequence of site allocations are identified with relevant site specific policies.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			but would question BDC’s ability to deliver. At the time of the plan, East Markham has plans for 59 houses in and around the Mark Lane / Beckland hill area with little evidence of any thought as to how to provide safe routes in and out of the village for residents.		
Representation Reference: NRF-REF017.3 Name: Doncaster Metropolitan Borough Council	Refers to: POLICY ST54 Transport Infrastructure and Bassetlaw Transport Assessment -- Transport and infrastructure – Harworth/Bircotes and Tickhill and Bawtry	Legal compliance and soundness: Not specified	Comments: Welcome the acknowledgement in the Duty to Cooperate Compliance Statement (updated August 2021) that discussions with Doncaster Council are still “ongoing with regard to wider impacts of future development on Bawtry and joint transport work and highway impacts”. However: 1. There is still no acknowledgment on the effect of development on Doncaster’s surrounding villages i.e. Bawtry, Tickhill within the Local Plan. Although the joint Transport Study has been included in the Local Plan evidence base, it has not been expanded upon in explanatory text. 2. Policy ST54 does not include the proposed improvement to the junction at Stripe Road/Tickhill Spital. This scheme should be listed in the policy.	Suggested changes: 1. Include an explanation of the effect of development in Bassetlaw on Bawtry and Tickhill in the supporting text. 2. Include the proposed improvement to the junction at Stripe Road/Tickhill Spital in Policy ST54 Transport Infrastructure	Officer comments: The Bassetlaw Transport Study 2022, accepted by the Local Highways Authority, identifies the associated impacts to the road network from the proposed Local Plan development. As such it is not considered point 2 is necessary. This states that there is no impact from Local Plan site allocations outside the district including Doncaster. The January 2022 Addendum amends Policy ST54 and the supporting text, including paragraph 11.1.5. It is considered that this addresses point 1 raised, by clarifying that the transport work includes the impact of consented

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
					growth in Harworth & Bircotes upon the Doncaster Council area. Required transport mitigation has been identified through relevant planning consents.
Representation Reference: NRF-REF021.4 Name: Derbyshire County Council	Refers to: POLICY ST54: Transport Infrastructure and Improvement Schemes supporting text Paragraph 11.1.7	Legal compliance and soundness: Not specified	Comments: It is noted from para 11.1.7 that, as a strategic transport corridor, the A57 between the A1 and the M1 accommodates a significant level of regional and sub-regional traffic. The Bassetlaw Transport Study 2021 has identified that by 2037, parts of this route will likely be at or over capacity and that more substantial mitigation may be required. Derbyshire County Council, as an adjoining Highway Authority, would welcome the opportunity to work with the District Council, Nottinghamshire County Council Highways Authority and the neighbouring authorities to develop the A57 Improvement Plan.	Suggested changes: No suggested changes to policy.	Officer comments: Noted.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Representation Reference: REF021.11 Name: Sport England	Refers to: POLICY ST55: Promoting Sustainable Transport and Active Travel	Legal compliance and soundness: The plan is considered legally compliant, sound and complies with the Duty to Cooperate.	Comments: The policy is supported.	Suggested changes: None	Officer comments: Noted
Representation Reference: REF048.22 Name: Nottinghamshire County Council	Refers to: POLICY ST55: Promoting Sustainable Transport and Active Travel	Legal compliance and soundness: Legal compliance: not specified. Soundness – not specified. Compliance with Duty to Cooperate: not specified.	Comments: Part 2.c) should include the securing of a Travel Plan Coordinator, the payment of monitoring fees, and to pay for the delivery of additional sustainable travel measures/initiatives if modal share targets are not achieved.	Suggested changes: Part 2.c) include securing a Travel Plan Coordinator, the payment of monitoring fees, and payment of delivery of additional sustainable travel measures/initiatives if modal share targets are not achieved	Officer comments: It is considered that a proposed suggest change to part 2c) will address this matter as: minimise additional travel demand by car through measures identified in a Travel Plan and associated Action Plans, where the securing of a Travel Plan Coordinator may be necessary to facilitate the payment of monitoring fees and to pay for the delivery of additional sustainable travel measures/initiatives if modal share targets are not achieved through demand management

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
					measures, where appropriate;

Infrastructure and Delivery

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name: Representation Reference: 1935142.2 Name: Sheffield City Council	Refers to: POLICY ST56: Safeguarded Land	Legal compliance and soundness: Legal compliance: not specified. Plan is sound. Plan complies with Duty to Co-operate.	Comments: Support the proposal for a new rail station (Policies ST56 & ST4) at the Bassetlaw Garden Village which will enable enhanced rail connections to Sheffield in the longer term, providing opportunity for longer distance trips to be made by more sustainable modes in future. Request that Sheffield City Council and South Yorkshire City Region are kept updated in relation to the station, with regards to any impact on Sheffield to Lincoln rail services/ stations, and any interactions with the potential development of the Barrow Hill Line.	Suggested changes: None	Officer comments: The May 2022 Second Addendum withdraws the Garden Village from the Local Plan and made consequential amends to Policy ST56.
Representation Reference: REF048.23 Name: Nottinghamshire County Council	Refers to: POLICY ST56: Safeguarded Land	Legal compliance and soundness: Not specified	Comments: There is likely to be other land that requires safeguarding such as the double bends on the B6420 Mansfield Road at the junctions with Green Lane and Old London Road to facilitate a road realignment to create safe and suitable access to the Garden Village, and the B6420 Mansfield Road/A620 junction to facilitate capacity improvements.	Suggested changes: Identify and safeguard land for necessary highways improvements associated with site allocations	Officer comments: The Local Plan transport evidence base has not identified any land necessary to safeguard for transport infrastructure. The May 2022 Second Addendum withdraws the Garden Village from the Local Plan and made consequential amends to Policy ST56.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Summary of comments:	Suggested changes by consultee:	Officer Comments
Representation Reference: REF035.10 Name: Home Builders Federation	Refers to: POLICY ST57 – Digital Infrastructure	Legal compliance and soundness: Plan is legally compliant and complies with the Duty to cooperate. Plan is unsound	Comments: Should not impose new electronic communications requirements beyond the provision of infrastructure as set out in statutory Building Regulations (Part R). The Budget (11 th March 2020), confirmed future legislation to ensure that new build homes are built with gigabit-capable broadband. The plan should recognise that full fibre broadband connection is reliant on a third-party contractor over which a developer is unlikely to have any control and therefore cannot confirm availability at first occupation. The Policy is not included in the Whole Plan Viability Assessment. It should be viability tested before being put forward to be examined.	Suggested changes: Policy ST57 (Bullet Points 1 – 3) are unsound and fail the four tests of soundness defined by the 2021 NPPF (para 35). Policy ST57 (Bullet Points 1 – 3) are not positively prepared, justified, effective and consistent with national policy. Before the Bassetlaw Local Plan is submitted for examination, Policy ST57 (Bullet Points 1 – 3) should be deleted.	Officer comments: Policy ST57 accords with paragraph 114 of the NPPF, Part R of the Building Regulations and provides sufficient caveats to enable viability to be taken into account appropriately.
Representation Reference: REF47.11 Name: Welbeck Estates	Refers to: POLICY ST57 – Digital Infrastructure	Legal compliance and soundness: Plan is legally compliant and complies with	Comments: Consideration must be given to the specific conditions and limitations within rural Bassetlaw to deliver digital infrastructure, such as	Suggested changes: The Policies should include the specific conditions and limitations presented within rural Bassetlaw to deliver the	Officer comments: Policy ST57 and the supporting text accords with paragraph 114 of the NPPF, Part R of the Building Regulations and provides flexibility to ensure

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Summary of comments:	Suggested changes by consultee:	Officer Comments
		Duty to Cooperate. Plan is Unsound.	heritage and landscape constraints. The policy must be written subject to the proof that it can be viably and practically delivered in the context of the proposals concerned. There must be an ability in the policy wording for the applicant to demonstrate if such conditions are unsuitable to deliver the policy aspirations.	means of the policy requirements. There must be an ability in the policy wording for the applicant to demonstrate if such conditions are unsuitable to deliver the policy aspirations.	the specific conditions in the rural area can be appropriately addressed. All proposals should be considered against all relevant Local Plan policies so it is not considered necessary to reference landscape and heritage matters in Policy ST57.
Representation Reference: NRF-REF014.19 Name: East Markham Parish Council	Refers to: POLICY ST57 – Digital Infrastructure	Legal compliance and soundness: Not specified	Comments: The council supports this policy.	Suggested changes: None	Officer comments: Noted.

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name:					
Representation Reference: REF001.9 Name: Canal and River Trust	Refers to: POLICY ST58: Provision and Delivery of Infrastructure	Legal compliance and soundness: Plan complies with the Duty to Cooperate. Plan is legally compliant. Plan is sound.	Comments: Significant new developments in the vicinity of the canal network place extra liabilities and burdens upon the waterway infrastructure, essential that appropriate contributions are secured from developers, where necessary, in order to mitigate the impact of new development. The requirement that developer contributions will be used to meet the infrastructure needs of new development should help account for the potential demands on the walking and cycling network in proximity to new development.	Suggested changes: None.	Officer comments: None
Representation Reference: REF047.6 Name: Welbeck Estates	Refers to: POLICY ST58: Provision and Delivery of Infrastructure	Legal compliance and soundness: Plan is legally compliant and complies with Duty to Cooperate. Plan is Unsound.	Comments: Remain concerned with the wording of Part F, which states that the local authority will be able to review the section 106 contributions associated and agreed with development. It should only be right that the developer can review the contributions required. In the Planning Officer's comments, it appeared they agreed. Policy ST58 should make provision for the review mechanism to be mutually operative to both the applicant and the local authority.	Suggested changes: Make provision for the review mechanism to be mutually operative to both the applicant and the local authority.	Officer comments: The January 2022 Addendum amended Policy ST58. It is considered that this addresses the matters raised.
Representation Reference: REF048.6 Name: Nottinghamshir	Refers to: POLICY ST58: Provision and Delivery of Infrastructure	Legal compliance and soundness: Legal compliance - not specified. Plan is unsound.	Comments: Notes that it is BDC's intention to apply a zero CIL charge to Local Plan allocations of 50 dwellings and above owing to matters of viability on larger sites. This will have a serious impact on the level of CIL which can be	Suggested changes: NCC offers to work with the Council to develop an agreed mechanism (similar to that for the A52 corridor in Rushcliffe) under which	Officer comments: It should be noted that the IDP accompanying the May 2022 Second Addendum provides an up to date position with regard to the

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
e County Council		Compliance with Duty to Cooperate – not specified	<p>accrued over the plan period. The estimated funding gap is £89 million. Paragraph 4.1 of the Draft Charging Schedule confirms that 3639 units will be delivered through Local Plan allocations to 2037 (consistent with figure 8 of the Local Plan) and 4.2 then calculates some £18 million of CIL funding to be accrued over the Plan Period from the LP housing trajectory. This calculation does not appear to have deducted the effect of zero Levy on the largest sites which the charging schedule proposes. The largest sites involving developments of 50 or more (Table 24 Bassetlaw Transport Study) will deliver 2996 units. This will only leave 643 allocated dwellings eligible for CIL resulting in only £1.1m to be generated by CIL from Local Plan sites (based on BDC's assumptions about average floorspace per dwelling). Windfalls will add, but this does not deduct affordable dwellings or that passed to local communities. Concerned since the Bassetlaw Transport Study (para 1.5.6) recommends that CIL are sought from future development within the District towards the strategic improvements identified (Table 28) eg on and around the A57 corridor needed during the Plan period. Supportive of this corridor as a project for highway and transport improvements over the Plan period (and identified in the emerging Nottinghamshire Strategic Infrastructure Plan)</p>	<p>larger sites make a proportionate and justified contribution towards the A57 Corridor improvements in the BTS. These would be pooled, potentially through S106 mechanisms and both parties would jointly seek to secure other sources of funding during the Plan period to enable the delivery of these improvements. This will fulfil the recommendations of the BTS if a zero CIL rate is agreed.</p>	<p>funding gap, anticipated developer contributions and CIL contributions from Local Plan growth. The Whole Plan Viability Assessment 2022 confirms the position relating to CIL eligible sites. The Bassetlaw Transport Study 2022, accepted by the Local Highways Authority states the appropriate mechanisms that can be used to secure funding from development for strategic transport infrastructure; including developer contributions and CIL. The Council welcome NCC's offer to work jointly to progress the improvement plan; the Council facilitate the A57 Improvement Plan Project Group in partnership with NCC, National Highways and relevant authorities. The Bassetlaw Transport Study has identified the traffic impact of relevant Local Plan site allocations and proportionate contributions towards mitigation including</p>

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			there no sources of funding to contribute to the improvements necessary to help mitigate the impact of Local Plan allocations.		to address impacts upon the A57. The A57 Improvement Plan is a longer-term plan that will look at wider improvements to the link between the M1 and A1 in consultation with other relevant partners. The work programme and timetable has been agreed with NCC and partners, as evidenced by statement of common ground.
Representation Reference: REF048.24 Name: Nottinghamshire County Council	Refers to: SECTION 12.3 Provision of Infrastructure	Legal compliance and soundness - not specified. Compliance with Duty to Cooperate – not specified	Comments: Paragraph 12.3.3 and 12.3.15 should refer to National Highways rather than Highways England. Paragraph 12.3.14 The preferred method of securing highway infrastructure is by planning conditions under Section 38 and 278 legal agreements Highways Act 1980. Only support the use of S106 agreements to secure funding for bus service and public transport infrastructure contributions, and potentially traffic management and traffic calming measures. S106 funding can be used to obtain justified and proportionate contributions to strategic transport improvements at the A57 and the proposed railway station serving the proposed Garden Village.	Suggested changes: Paragraph 12.3.3 and 12.3.15 should now refer to National Highways rather than Highways England. Work with NCC to review mechanisms for delivering transport infrastructure.	Officer comments: The January 2022 Addendum amended Policy ST58 and the supporting text and Policy ST54 Transport Infrastructure. It is considered these address the matters raised. The May 2022 Second Addendum withdraws the Garden Village from the Local Plan.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Representation Reference: NRF-REF027.1 Name: Bassetlaw CCG	Refers to: POLICY ST58: Provision and Delivery of Infrastructure	Legal compliance and soundness: Legal compliance and soundness - not specified. Compliance with Duty to Cooperate – not specified	Comments: Welcome working in partnership with the Council to maintain and where practicable improve access to the full range of health services for Bassetlaw residents. Delighted to read the high aspirations for Bassetlaw towns and rural settlements, our communities and their futures and match your intention to develop prosperous and healthy communities in the future. As previously stated the extent of developments will impact on primary, community and secondary care services. For secondary care, in particular on the Bassetlaw Hospital site where we are seeing increases in urgent and emergency care attendance. Also an increasing pressure on delivery of primary care services. To this end, all housing site allocations (Worksop and Retford) have a requirement for an appropriate financial contribution towards enabling primary and acute healthcare services to address patient growth associated with development.	Suggested changes: None	Officer comments: Noted

Evidence Base

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name: Representation Reference: REF049.2 Name: Historic England	Refers to: Bassetlaw Garden Village Desk Based Archaeological Assessment 2021	Legal compliance and soundness: Plan is legally compliant. Plan is sound. Plan complies with Duty to Co-operate.	Comments: Further to Historic England’s previous concerns in relation to the approach of the Plan to the historic environment we welcome the Bassetlaw Garden Village Archaeological Assessment of June 2021 (CD-009) which addresses concerns previously raised.	Suggested changes: None	Officer comments: Noted. The May 2022 Second Addendum withdraws the Garden Village from the Local Plan.
Representation Reference: REF035.11 Name: Home Builders Federation	Refers to: Viability and Deliverability – Viability Assessment 2021 August	Legal compliance and soundness: Plan is legally compliant and complies with the Duty to cooperate. Plan is unsound.	Comments: Viability assessment is highly sensitive to changes in its inputs; an adjustment in one assumption can have a significant impact. It excludes any abnormal costs; this suppresses the impact of policy compliant requirements, which are based on a percentage increase of build costs. The exclusion implies that all abnormal costs should be fully deducted from the assumed Benchmark Land Value (BLV). The reduction of BLV to account for site-specific abnormal costs is only valid where that reduction maintains a sufficient incentive for the landowner to sell as required by the NPPG (ID 10-013-20190509), which states that the BLV should reflect the minimum return at which it is considered a reasonable landowner would be willing to sell their land. The NPPG confirms that the premium above the Existing Use Value (EUV) should provide a reasonable incentive for the landowner to sell. Whilst the NPPG (ID 10-014-20190509) requires the BLV to	Suggested changes: Before the Bassetlaw Local Plan is submitted for examination, further viability sensitivity testing work should be undertaken.	Officer comments: It is considered that if a piece of land has inherent flaws that require abnormal expenditure to bring the land up to a developable state, then it is reasonable that these costs are deducted from the land value. In the event these flaws are so great that they exceed the value of the land in alternative use then, such land is unlikely to come forward for residential development.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			reflect the implication of abnormal costs and site-specific infrastructure costs, this reflection is not equitable to full deduction because this may result in insufficient incentive for a landowner to sell, which will stagnate land supply as landowners will not bring land forward for development. The BLV should reflect the implications of abnormal costs as per NPPG; there is a tipping point beyond which the land value cannot fall as the landowner will not be sufficiently incentivised to release their site for development.		
Representation Reference: REF035.11 Name: Home Builders Federation	Refers to: Viability and Deliverability – Viability Assessment 2021 August	Legal compliance and soundness: Plan is legally compliant and complies with the Duty to cooperate. Plan is unsound.	Comments: The full impacts of First Homes in Policy ST29 on viability have not been considered. There will be an increased cost to developers selling First Homes in terms of marketing and an increased risk; will not be able to sell First Homes in bulk to a Registered Provider thus obtaining a more reliable up front revenue stream. Increased risk is not reflected in the 6% contractor’s margin assumed for affordable housing because there is not a guaranteed, known end value. First Homes may impact on the ability of developers to sell similarly sized open market units as some will use the discounted First Homes route. This may result in slow sales of similar open market units, increased sales risk and additional planning costs (if sites have to be re-planned with an alternative housing mix).	Suggested changes: Before the Bassetlaw Local Plan is submitted for examination, further viability sensitivity testing work should be undertaken.	Officer comments: It is considered that the assumptions used to in the Whole Plan Viability Assessment 2022, that inform amended Policy ST29 in the May 2022 Second Addendum are reasonable and in line with statutory guidance. It is unclear why First Homes, which is a specific Government initiative to make housing more attractive and available to first time buyers, would significantly increase developer’s risk.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Representation Reference: REF035.11 Name: Home Builders Federation	Refers to: Viability and Deliverability – Viability Assessment 2021 August	Legal compliance and soundness: Plan is legally compliant and complies with the Duty to cooperate. Plan is unsound.	Comments: The impacts of the provision of 2% serviced plots for self & custom build on sites of more than 100 dwellings in Policy ST30 have not been viability tested. This will impact on the development economics of these schemes. It is unlikely that up front site promotion costs, fixed site externals, site overheads and enabling infrastructure costs will be recouped because the plot price a self & custom builder is able to pay may be constrained by higher build costs. There are impacts of not recouping profit otherwise obtainable if the dwelling was sold on the open market, disruption caused by building unsold plots out of sequence from the build programme of the wider site and unsold plots remaining undeveloped.	Suggested changes: Before the Bassetlaw Local Plan is submitted for examination, further viability sensitivity testing work should be undertaken.	Officer comments: It is considered that the assumptions used to in the Whole Plan Viability Assessment 2022 accompanying the May 2022 Second Addendum are reasonable and in line with statutory guidance. There is no evidence to show that serviced self build plots will not fetch a premium price. It is considered that individual plots are very attractive to buyers seeking to build their own property and command prices well in excess of the benchmark land values set out in the assessment that will enable the ancillary costs identified to be recouped.

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Representation Reference: REF035.11 Name: Home Builders Federation	Refers to: Viability and Deliverability – Viability Assessment 2021 August	Legal compliance and soundness: Plan is legally compliant and complies with the Duty to cooperate. Plan is unsound.	Comments: The extra over cost of £11 per sqm for M4(2) standard is unexplained. DCLG Housing Standards Review, Final Implementation Impact Assessment, March 2015 Table 45 identified a cost of £521 per unit for 3 bed semi-detached house, £907 - £940 per unit for apartments (based on 2015 costs which are out of date). The Government’s consultation Raising Accessibility Standards for New Homes 2020 estimates the additional cost per new dwelling, which would not already meet M4(2), is approximately £1,400. M4(2) compliant dwellings are larger than NDSS therefore larger sizes should be used when calculating additional build costs and any other input based on square meters except sales values, which are unlikely to generate additional value for enlarged sizes. The Viability Assessment tests £3 per sqm assuming only 30% of dwellings are required to meet M4(2) standard but the policy requires all dwellings to meet M4(2) standards.	Suggested changes: Before the Bassetlaw Local Plan is submitted for examination, further viability sensitivity testing work should be undertaken.	Officer comments: It is considered that the assumptions used to in the Whole Plan Viability Assessment 2022, accompanying the May 2022 Second Addendum are reasonable and in line with statutory guidance. The £11/m ² is a 1% extra over cost allowance (in section 2.5) and is the additional cost in meeting Category 2 standards for typical houses, rather than equating fixed costs to specific house types. The Viability Assessment confirms that 100% Category 2 provision can be achieved as part of a financially viable scheme.
Representation Reference: REF035.11 Name: Home Builders Federation	Refers to: Viability and Deliverability – Viability Assessment 2021 August	Legal compliance and soundness: Plan is legally compliant and complies with the Duty to cooperate. Plan is unsound.	Comments: The costs of providing 10% biodiversity net gain identified by Policy ST40 are significant. Government has confirmed that work needs to be undertaken to address viability concerns in order that biodiversity net gain does not prevent, delay or reduce housing delivery. The assumption of £500 per dwelling is less than £1,011 per unit for greenfield development cost set out as the	Suggested changes: Before the Bassetlaw Local Plan is submitted for examination, further viability sensitivity testing work should be undertaken.	Officer comments: It is considered that the assumptions used to in the Whole Plan Viability Assessment 2022, that inform amended Policy ST40 in the May 2022 Second Addendum are reasonable and in line with

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>East Midlands regional cost (2017 cost estimate) in Tables 16 & 17 in the DEFRA Biodiversity Net Gain & Local Nature Recovery Strategies Impact Assessment 15/10/2019. Costs increase significantly for off-site delivery under Scenario C to £3,545 per dwelling for greenfield. The under-estimation for greenfield sites is concerning given that 76% of housing is greenfield. Bullet Point 3 states “at least” so more than 10% may be sought, which would increase costs. May be an impact on the ratio of gross to net site acreage.</p>		<p>statutory guidance. In accordance with the mitigation hierarchy, it is considered that most net gain would fall within scenarios A and B of the DEFRA Biodiversity Net Gain & Local Nature Recovery Strategies Impact Assessment, therefore £500 per dwelling is considered appropriate. Policy ST40 does not require net gain to exceed 10%. 10% is the minimum figure, should a developer wish to deliver in excess of that the policy is supportive, and the developer would need to demonstrate that this can be secured as part of a financially viable scheme.</p>
<p>Representation Reference: REF035.11</p> <p>Name: Home Builders Federation</p>	<p>Refers to: Viability and Deliverability – Viability Assessment 2021 August</p>	<p>Legal compliance and soundness: Plan is legally compliant and complies with the Duty to cooperate.</p>	<p>Comments: Policy ST50 Bullet Points 1(d) & 1(g) of the Gleeds construction costs are based on current Building Regulations. The costs for the 2021 Part L Interim Uplift and Future Homes Standard are excluded. The Government’s Future Homes Standard: 2019 Consultation on changes to Part L and Part F of the Building Regulations for new dwellings</p>	<p>Suggested changes: Before the Bassetlaw Local Plan is submitted for examination, further viability sensitivity testing work should be undertaken.</p>	<p>Officer comments: It is considered that the Whole Plan Viability Assessment 2022 supporting the May 2022 Second Addendum addresses the costs associated with the Part L</p>

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
		Plan is unsound.	estimated the cost of the Interim Uplift as £4,615 per unit. The Future Homes Standard 2025 will add further extra-over costs. There are no costs for electric vehicle charging points. The Department for Transport - Electric Vehicle Charging in Residential & Non-Residential Buildings consultation estimated a cost of £976 per EVCP plus an automatic levy for upgrading networks capped at £3,600. Cost for the optional water efficiency standard is excluded despite the requirement under Policy ST50. The DCLG Housing Standards Review Cost Impact, September 2014 estimated an extra-over allowance of £10 per unit. This is dated and should be increased to reflect 2021 prices. All should be included in viability testing.		uplift. Policy ST50 does not require an electric vehicle charging point to be provided. It requires the infrastructure to be provided to enable a charging point to be added in the future. This is explained by the supporting text. The Viability Assessment includes an appropriate cost to cover the optional water efficiency standard.
Representation Reference: REF035.11 Name: Home Builders Federation	Refers to: Viability and Deliverability – Viability Assessment 2021 August	Legal compliance and soundness: Plan is legally compliant and complies with the Duty to cooperate. Plan is unsound.	Comments: Provision above Part R of the Building Regulations for digital infrastructure should include an extra-over cost allowance.	Suggested changes: Before the Bassetlaw Local Plan is submitted for examination, further viability sensitivity testing work should be undertaken.	Officer comments: Policy ST57 makes no reference to providing above Part R of the Building Regulations.
Representation Reference: NRF-REF017.1 Name: Doncaster	Refers to: Duty to Cooperate Statement	Legal compliance and soundness: Legal compliance – not specified. Plan is unsound.	Comments: In 20th January 2021, raised concerns about the lack of SoCG between Bassetlaw and Doncaster Council. Bassetlaw consulted Doncaster Council on a SoCG (response 27 April 2021). The Publication version uses the Doncaster Local Plan	Suggested changes: Remove Doncaster Council Local Plan Statement of Common Ground from Bassetlaw District Council’s website.	Officer comments: National policy asks that SOCGs be maintained and updated. Although the Doncaster SOCG was agreed as part of

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Metropolitan Borough Council		Compliance with Duty to Cooperate – not specified	SoCG. It is agreed that the content regarding and referring to Bassetlaw is still appropriate, but the majority refers to Doncaster's other neighbouring authorities and prescribed bodies and should not be included as part of the Bassetlaw Local Plan evidence base. A separate SoCG is with us (12 October 2021) this should be used.	Replace it with the draft Statement of Common Ground regarding Bassetlaw Local Plan.	Doncaster's Local Plan process it still remains a relevant part of the Bassetlaw Local Plan evidence base in terms of various strategic policy matters agreed at that time. Relevant aspects will be updated and transferred to a SoCG relating to Bassetlaw Local Plan to inform submission.
Representation Reference: 1945966.1 Name: Resident	Refers to: Equality Impact Assessment	Legal compliance and soundness: Plan is not legally compliant. Plan is unsound. Compliance with Duty to Co-operate not specified	Comments: The Equality Impact Assessment (EIA) misrepresents the nine protected characteristics of the Equalities Act (2010) by replacing 'Sex' with 'Gender'. This misreading of the EIA undermines the accuracy of the EIA and therefore casts doubt on the soundness of the EIA.	Suggested changes: The EIA contained within the Draft Local Plan should be withdrawn, and then redrafted with the corrected list of the protected characteristics exactly as listed in the EA of 2010.	Officer comments: It is considered that the EIA that informs the 2022 January Addendum appropriately addresses this matter.
Representation Reference: REF020.8 Name: Town Planning.co.uk on behalf of consultee	Refers to: Bassetlaw Heritage Methodology November 2020 in relation to HS14	Legal compliance and soundness: Plan is legally compliant and complies with the Duty To Cooperate.	Comments: The Bassetlaw Heritage Methodology (November 2020) undertook site assessments for the historic environment but failed to assess site HS14 or other reasonable alternatives in Tuxford. This is a serious omission, given that this is the only settlement proposed for site allocations which has not been assessed in heritage terms. This is	Suggested changes: Delete the proposed site HS14 and allow the review of the Tuxford Neighbourhood Plan to consider other reasonable alternatives as part of a	Officer comments: Since 2018, the Neighbourhood Plan team has met with Tuxford Parish Council and the Neighbourhood Plan group on several occasions regarding a review of the

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
		Plan is unsound.	<p>surprising given that site HS14 lies on the opposite side of the road to the Tuxford Conservation Area, a designated heritage asset. The Site Assessments (Historic Environment) Methodology Update (July 2021) has retrofitted a heritage assessment to site HS14 and reasonable alternatives in Tuxford but doesn't assess site LAA090 (NP10) to the south of Lincoln Road. This confirms that the majority of the reasonable alternative sites in Tuxford are suitable in heritage terms. This latest methodology concludes that there would be a negligible effect although uncertain on heritage assets. This conflicts with the Sustainability Appraisal (SA) which identifies a major negative impact, as such the proposed allocation would conflict with Policy 35. It would also conflict with Policy 42 and Policy 43 which look to protect the historic environment and heritage assets respectively.</p>	<p>comprehensive analysis and consideration of all other potential sites around Tuxford including Brownfield and Greenfield sites. Within Tuxford there are a number of previously developed sites or sites where existing uses no longer represent the most beneficial use. These may more appropriately be used for residential development with their existing use relocated to modern premises on an industrial estate e.g. land to the rear of 10 Newcastle Street; Former Goods Yard on Lincoln Road; the Platts Harris site; and Land around Eastfield Farm. Other potential sites around Tuxford would have a better relationship to existing built form such as LAA087 (NP11), which if properly assessed as part of an</p>	<p>Tuxford Neighbourhood Plan. Very little progress has been made so far. The Council needs to take a positive and proactive approach to the allocation of land for housing in Tuxford, defined as a Large Rural Settlement. Site HS14 is included in the Bassetlaw Heritage Methodology as NP04. This is the LAA reference for the Neighbourhood Plan consultation of sites undertaken in September 2020. It comprises the heritage assessment undertaken for the LAA process and SA process. It is not retrofitted. It is separated into one document to address heritage matters. It is considered that the Land Availability Assessment, Sustainability Appraisal and Site Selection Methodology provide an appropriate basis to consider known available sites and their</p>

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
				overall strategy for the town could allow the opportunity for a new primary school to be created as part of an extended education campus next to Tuxford Academy as part of a new mixed-use allocation including new housing.	suitability to address the district's housing need.
Representation Reference: REF032.1 Name: Town Planning.co.uk	Refers to: Bassetlaw Economic Needs Assessment identifies in Table 15 and Table 17- EDNA	Legal compliance and soundness: Plan is legally compliant and complies with the Duty to Cooperate. Plan is unsound.	Comments: Object to the allocation of Site EM008: High Marnham Energy Hub. Consider that it fails all of the tests of soundness. The Bassetlaw Economic Needs Assessment Table 15 identifies the future need for employment land as 63.0 ha with higher need under scenarios subject to strong performance in transport and distribution. Whilst the Local Plan might want to pursue a growth strategy, policies ST7, ST8 and Policy 9 collectively allocate some 201.4 ha of employment land on general sites alongside 118.7 ha of employment land on a strategic site 5.1 times larger than the evidential requirement. The plan suggests that 87.9 ha of this land is available during the plan period which is 4.6 times larger than the evidential requirement. No evidence to demonstrate that there is a need to allocate land that exceeds the need put forward in the Bassetlaw Economic Needs Assessment. In the absence of substantive evidence underpinning	Suggested changes: Delete the proposed site EM008: High Marnham Energy Hub for employment. If wanted it could be retained for the siting and production of renewable energy, such as a solar farm without any employment provision.	Officer comments: The January 2022 Addendum amends Policy ST7 and deletes reference to the Former High Marnham Power Station site for employment use. Consequently Policy ST8 has also therefore be deleted.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>the Local Plan for the period 2018 to 2037; this does not justify the allocation of inappropriate or unsuitable sites. As such there is no unmet strategic employment need requirement to justify the allocation of site EM008. Even ignoring the strategic site in Policy ST7; the policy allocates land which far exceeds the identified future requirement of 63.0 ha. Removal of the 38.4 ha site at High Marnham would leave 130.8 ha on general sites which meets the future need identified; with the 118.7 ha of land in Policy 9 as additional buffer for strategic inward investment. Table 17 identifies that the High Marnham site is “Not in a commercially attractive location.” The evidence underpinning the Plan does not support the allocation in terms of quantum or location concluding: “Not included in supply.” Despite this the Local Plan allocates the site. Paragraph 6.1.16 of the Local Plan states: “In addition, Policy ST7 makes a positive policy intervention to secure the regeneration of the former power station site at High Marnham for the green energy sector. This is regarded as essential to support local rural communities as well as the wider economic aspirations for the District, in this plan period and the next. A Local Development Order will facilitate delivery in accordance with Policy ST8.” This is misleading, High Marnham power station was decommissioned in 2003 18 years ago and the main demolition took place in 2004 and 2006. According to BBC News the power station only</p>		

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			employed 109 people prior to closure and it has provided no employment now for 18 years.		
Representation Reference: REF033.9 Name: Stone Planning Services Limited on behalf of Charterpoint (NG22) Limited	Refers to: G L Hearn’s Economic Development Need Assessments Parts 1-3, January 2019	Legal compliance and soundness: Plan is legally compliant and complies with Duty to Cooperate. Plan is unsound	Comments: Considers spatial options and their ranking. Option 3 would include Markham Moor and is ranked in third place behind ‘parallel strategies’ (Option 8) and ‘hybrid of options’ (Option 6) in first place Option 6 includes Option 3: “Focus New Development on A1 Corridor”. Allocating some land for economic development and associated housing development along the A1 corridor would allow the Plan to address Bassetlaw’s strength in the distribution sector and good access to the strategic road network, without being detrimental to the character of settlements along this corridor.” The highest ranking option would include Markham South on the basis that assessment sees the allocation of sites for employment uses along the A1 corridor, as it runs through Bassetlaw. There is a range of Brownfield and Greenfield sites across the south of the district including Gamston Airport South and around Markham Moor, the latter amounting to in excess of 40 ha of Greenfield (para 2.36) Part 3 assessment indicates that the delivery of a workforce in this area is likely to facilitate strong employment growth. The level of employment demand is likely to be linked in part to the level of	Suggested changes: Update the Economic Development Need Assessments Parts 1-3, January 2019.	Officer comments: The May 2022 Second Addendum withdraws the Garden Village from the Local Plan. The Local plan allocates employment sites along the A1 corridor. It is considered the Sustainability Appraisal, Land Availability Assessment and Site Selection Methodology are consistent with national policy and provide a robust basis by which to determine the most sustainable sites to be allocated to meet the identified employment need in the Plan.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>housing but is estimated as 10-20ha from a lower level of settlement in the region of 1,000 homes, subject to location (para 2.37) This can be contrasted with para 3.4 of G L Hearn’s economic assessment: “It is considered unlikely that a garden village will act as a catalyst for a major inward investment attracting higher value sectors not typically represented in the FEMA. However, there should be potential to create an entrepreneurially orientated settlement that can stimulate local business growth and productivity, particularly if public or other investment can support this.” Provide further evidence of the attractiveness of the A1 corridor and questions the ability of the Bassetlaw Garden Village to attract inward investment and deliver the Plan’s strategy.</p>		
<p>Representation Reference: REF033.10</p> <p>Name: Stone Planning Services Limited on behalf of Charterpoint (NG22) Limited</p>	<p>Refers to: Nathaniel Lichfield and Partners Employment Land Capacity Study 2010</p>	<p>Legal compliance and soundness: Plan is legally compliant and complies with Duty to Cooperate.</p> <p>Plan is unsound</p>	<p>Comments: Commissioned by the Council; whilst over 10 years old many of the conclusions are still highly relevant and picked up in the more recent GL Hearn Employment Needs Study. The NLP report highlights the high employment asset value of the M1 and A1. With regard to the A1 corridor it concluded that there was strong demand for employment uses particularly distribution within the potential for 5-10 hectares of new allocations in the vicinity of Markham Moor/Gamston and/or Blyth. It assessed individual sites along the A1 corridor and two sites at the Markham Moor interchange. Land to the South of the A57/A1</p>	<p>Suggested changes: Allocate land for employment to the South of Markham Moor.</p>	<p>Officer comments: The Employment Land Capacity Study was produced in 2010, some 12 years ago. The HEDNA 2020 and the HEDNA Addendum 2022 represent an up to date position of the employment land supply in the district. It is considered this is consistent with the NPPF that requires the preparation of Plans to be</p>

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>Markham Moor (16.7 hectares) was of “good quality” with few identified constraints. Its development would complement the growth of a number of services and other employment developments that had taken place around the junction. Table 23 of the report scored the potential employment sites against a number of criteria. Markham South site scored highest with a score of 29 (Good) out of a maximum 35. Land (RA2). Only one site in the District scored higher – Gateford Common in Worksop scored 32. The Markham Moor A57/A1 site was assessed as being “good” and see no evidence why the site should not be in the current plan. The quality of the site remains as assessed in 2010. It has not become an average or poor site. The Local Plan process is concerned with consideration of reasonable alternatives. The advice the Council sought was favourable in relation to Markham South Paragraph 6.50 states: Areas in the vicinity of Markham Moor interchange and Gamston Airfield are likely to have the strongest level of demand from commercial operators. At paragraph 8.11 the report states: “It is understood that there is reasonably strong demand for distribution and general industrial uses along the A1 Corridor, although the broad location is removed from the major settlements (except for Harworth – see below). The two highest scoring sites are to the north and south of Markham Moor Interchange, MM1 and MM2.</p>		<p>underpinned by relevant and up-to-date, proportionate evidence, that focuses on supporting and justifying the policies concerned, and takes into account relevant market signals.</p>

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>Whilst both are greenfield sites with no formal designation in the Local Plan that are relatively remote from local services, they are highly accessible and attractive to hauliers. The 'land to the south of A57/A1 Markham Moor' is further advanced with developer interest for general industrial and storage with ancillary office space; both would be candidate sites should the Council decide to designate a new 5-10ha allocation along the Corridor". Fail to see how sites at Markham Moor A1 /A57 junction (Markham South) have not been taken forward in the Plan.</p>		
<p>Representation Reference: REF033.12</p> <p>Name: Stone Planning Services Limited on behalf of Charterpoint (NG22) Limited</p>	<p>Refers to: A1 Corridor Logistics Assessment prepared by Icen. August 2021 (Doc T1-014)</p>	<p>Legal compliance and soundness: Plan is legally compliant and complies with Duty to Cooperate.</p> <p>Plan is unsound</p>	<p>Comments: The assessment of the logistics market on the A1 corridor in Bassetlaw and the wider property market area focuses on the proposed allocations. Paragraph 6.3 sets out the key messages from the study. The messages are useful and develop a clear picture of the enhanced role of the A1 in the logistics market. In a period of fast rising demand responding to structural economic change, the lack of supply and policy constraints on the M1 has shifted focus onto the A1 which is able to provide levels of connectivity and labour sufficient to attract strategic occupiers. This is not to negate the role of the M18 and the benefits of forthcoming supply, but rather a manifestation of a supply demand imbalance in the wider area. It has not fully considered alternative sites along the A1 Corridor. Strongly supports development along this corridor, yet only the site at Apleyhead</p>	<p>Suggested changes: None suggested.</p>	<p>Officer comments: It is considered that the employment evidence base represent an up to date position of the employment land supply and the economic market in the district. This has informed the allocation of a number of sites along the A1 corridor (not just Apleyhead) for logistics. It is considered this approach is consistent with the NPPF that requires the preparation of Plans to be underpinned by relevant and up-to-date, proportionate evidence,</p>

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>Junction has been allocated. Expressed concern about delivery at Apleyhead Junction and are surprised that alternative sites such as Markham South have not been given further consideration. Failing to maximise the economic potential that the A1 corridor can generate. As has been witnessed by Brexit and COVID 19, customer attitudes can change rapidly e.g. the growth in online shopping has taken the industry by surprise such that new ways of working, particularly in logistics, are evolving rapidly. The impacts of Artificial Intelligence, will evolve over the life of the Plan and some of the safeguarded employment sites will no longer be suitable. Coupled with Policy ST11 there needs to be support for wider employment prospects ie storage and distribution on A1 corridor, sites like Markham South that are infrastructure ready. A recent Quarterly Report by Deep Insights identifies a number of key areas and trends “With people returning to workplaces, the offices subsector saw a large bounce in activity in Q2 (2021). However high-street and out-of-town retail remains in the doldrums as Covid-19 cases increase again”. “The warehousing sector has now averaged £500m per month for 6 months as Brexit and the online revolution drive changing behaviour.” Economic focus will transform over the life of the Plan, and it needs to be adaptive to change. The suitability of some of the protected sites cannot be relied upon to engage in these</p>		<p>that focuses on supporting and justifying the policies concerned, and takes into account relevant market signals.</p>

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>changes. Other more flexible sites need to be identified. The Independent (Ben Chapman, October 2021) assessed the shortage of logistics space and noted: A critical shortage of warehouse space risks causing yet further delays to Christmas stock already threatened by a growing backlog at UK container ports and a lack of lorry drivers businesses have warned. Warehouse operators reported that the industry is “creaking at the seams” and said companies were running “dangerously” low on time to be ready for the busiest period of the year. Warehouses have filled up rapidly thanks to a boom in online shopping during the pandemic, while businesses have responded to the chaos in global supply chains by building up stocks, putting further pressure on limited space. Industry leaders say that a cumbersome planning system means they cannot build new warehouse space fast enough to keep up with demand. The events of recent weeks have brought into focus just how goods are distributed across the country. Production takes up space, as does storage, movement, and storage again and movement. Goods are moved a number of times from production to final destination and facilities are needed at each stage. The production of goods, their storage and their movement is a matter of ‘logistics’: how space and travel is configured in sequence to link manufacture with demand. The need for more</p>		

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			business space, especially along transport corridors such as the A1 is now.		
Representation Reference: REF034.2 Name: Spawforths on behalf of the landowner	Refers to: Housing and Economic Development Needs Assessment November 2020	Legal compliance and soundness: Plan is not legally compliant, sound and does not comply with the Duty to Cooperate.	Comments: Concerned that the evidence base which supports the plan appears incomplete. The NPPF requires Local Plans to be based on a sound and up-to-date evidence base which identifies a development need and reflects the locational characteristics of a District. It is difficult to comment in depth where there is little supporting information. The Housing and Economic Development Needs Assessment, November 2020 utilises inaccurate and out of date base information. The locational characteristics of settlements and their appropriate boundaries have not been considered appropriately within the Spatial Strategy, which leads to sites not being assessed similarly within their locational characteristics. This is deeply flawed.	Suggested changes: <ul style="list-style-type: none"> • Increase the housing requirement to reflect the economic growth aspirations for the District and region. • Update the evidence base to reflect the current economic growth situation. • Extend the Plan period to be at least 15 years from the date of adoption, and for 30 years to reflect the Garden Village. • Include a higher buffer of 10%. • Review and provide evidence for the windfall allowance. • Review delivery rates and trajectory on allocations and commitments. • Identify further sites to increase flexibility in the Plan. 	Officer comments: The HEDNA, 2020 assessed the housing need based upon modelling of forecasted economic growth. The 2022 HEDNA Addendum maintains that approach and informs the updated position to the spatial strategy taken in the May 2022 Second Addendum. It is considered this provides a robust, up to date basis to inform the approach taken by Policy ST1.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
				<ul style="list-style-type: none"> • Allocate for housing Blyth Road, Blyth/Harworth 	
Representation Reference: REF034.5 Name: Spawforths on behalf of the landowner	Refers to: Housing Requirement – Economic Growth in HEDNA	Legal compliance and soundness: Plan is not legally compliant, sound and it does not comply with the Duty to Cooperate.	Comments: The HEDNA 2020 considers Housing Need, based on the Standard methodology, it then sets out the circumstances where housing need may be higher than the Standard methodology. The HEDNA reflects an out dated position on Covid-19 and the economic recovery considering e.g. it will take four years for jobs and unemployment to recover to pre-pandemic levels. The HEDNA does not reflect the scale of ambition and substantial employment opportunities within the area. There has been a significant change in circumstances since, and whilst the HEDNA nods to the potential to some of these changes it is clear that the implications are not fully reflected in the overall recommendations and within the Plan. It is concerning that given the political and strategic aims from a national to a local level that the HEDNA adopts a pessimistic view on the economy and economic growth, which transcends through to lower housing growth than would have occurred. The jobs growth figures for employment allocations e.g. Apleyhead appear to be below those suggested by site promoters. The HEDNA suggests jobs of 3,857 to 5,358, whilst site promoters suggest between 6,000 and 7,700 jobs. Similarly, vacancy rates are low in the area at circa 2.98% and there is only 0.34 years supply	Suggested changes: <ul style="list-style-type: none"> • Increase the housing requirement to reflect the economic growth aspirations for the District and region. • Update the evidence base to reflect the current economic growth situation. • Extend the Plan period to be at least 15 years from the date of adoption, and for 30 years to reflect the Garden Village. • Include a higher buffer of 10%. • Review and provide evidence for the windfall allowance. • Review delivery rates and trajectory on allocations and commitments. • Identify further sites to increase flexibility in the Plan. 	Officer comments: The HEDNA, 2020 assessed the housing need based upon modelling of forecasted economic growth. The 2022 HEDNA Addendum maintains that approach and informs the updated position to the spatial strategy taken in the May 2022 Second Addendum. It is considered this provides a robust, up to date basis to inform the approach taken by the Local Plan relating to employment land and economic growth which appropriately considers Covid impacts, and the consequential implications for the housing requirement. Delivery is based on up to date evidence in the LAA and Five Year Housing Land Supply Position Statement, 2021.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>of employment land. This points towards the need for further employment land and a balanced market with housing. Of concern is that higher jobs growth is considered with higher levels of housing, but this was dismissed with no consideration and only carried forward was low jobs growth at Apleyhead with a constant commuting ratio. This analysis does not follow and no explanation is provided. Further employment growth should and can occur, particularly as the site promoters suggest higher jobs growth with a constant commuting ratio suggests a housing need of 646 dwellings per annum. The Council can deliver at such levels of growth having recently delivered 693 (2019/20) and 775 (2020/21) new homes in the last couple of years. This would reflect PPG which indicates that consideration can be given to delivery rates; where previous delivery exceeds the minimum need it should be considered whether the level of delivery is indicative of greater need. There is evidence of delivery at a higher rate than the requirement of 591 dwellings, indicative of a higher need within Bassetlaw and capacity in the sector. The historic delivery rates do not reflect the changes in economic growth potential for the District. These should be considered when assessing future housing requirements, in accordance with Government guidance.</p>	<ul style="list-style-type: none"> • Allocate for housing site at Blyth Road, Blyth/Harworth 	

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Representation Reference: REF041.2 Name: DHL Real Estate Solutions on behalf of land owner	Refers to: Bassetlaw Local Plan – Housing & Employment Note, July 2020, and the Bassetlaw A1 Logistics Assessment, August 2021	Legal compliance and soundness: Plan is not legally compliant or sound. Plan complies with the Duty to Cooperate.	Comments: Bassetlaw Local Plan – Housing & Employment Note, July 2020, and the Bassetlaw A1 Logistics Assessment, August 2021 fail to recognise the extant consent (09/05/00002) at Bevercotes Colliery. The extant consent has the capability to deliver 2.7m sq ft of employment floorspace across 80 hectares. Undertaken a review of the numbers underpinning the Bassetlaw A1 Logistics Assessment, August 2021. While there are a number of potential calculations to estimate the future supply of employment land in the District, the inclusion of Bevercotes Colliery still results in an undersupply in all scenarios, and would not represent a material change to the outcome of this Assessment. Minor changes to the evidence base and Local Plan policy would allow the Plan to be found sound.	Suggested changes: Update the evidence base to reflect the reasonable prospect of Bevercotes Colliery being delivered. It should reflect the capability of the site to deliver 2.7m sq ft of employment floorspace across 80 hectares. As drafted, the evidence base and Policy ST7 cannot be considered “up-to-date”. Recommend that an addendum to the Bassetlaw A1 Logistics Assessment, August 2021 takes account of this.	Officer comments: It is considered that the HEDNA Addendum 2022 and the Bassetlaw A1 Logistics Assessment, Update 2022 and the amendment to Policy ST7 in the January 2022 Addendum address this matter.
Representation Reference: 1945371.4 Name: Bassetlaw Conservative Councillor Group	Refers to: Bassetlaw Infrastructure Delivery Plan, August 2021 PUB009	Legal compliance and soundness: Plan is not legally compliant, sound or complies with Duty to Cooperate.	Comments: Intends to approve the development of too many houses without real planning for new infrastructure. Extremely concerned, as believe residents are too, about the lack of infrastructure planning. Schools, Roads, Doctors Surgeries, and other services. Cannot build more houses without proper infrastructure planning.	Suggested changes: Proper infrastructure planning	Officer comments: It is considered the Local Plan and the Infrastructure Delivery Plan, informed by infrastructure partners views, appropriately provides for infrastructure required to support Local Plan growth. This includes for education, health facilities, transport and open space.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Representation Reference: REF008.11 Name: BDC and County Councillor	Refers to: PUB009 Bassetlaw Infrastructure Delivery Plan	Legal compliance and soundness: Not indicated as response was not submitted on Reg19 representation form	Comments: The inflated house building target of 591 buildings a year would detract from the quality of life of the existing communities. Their services are likely to be more difficult to access with the influx, and life satisfaction is likely to be reduced. None of this has been investigated, as the Bassetlaw Plan sponsors have assumed that extra services will be provided, which is not the case.	Suggested changes: N/A	Officer comments: It is considered the Local Plan and the Infrastructure Delivery Plan, informed by infrastructure partners views, appropriately plans for, and does not assume, that infrastructure required to support Local Plan growth is identified. This includes for education, health facilities, transport and open space.
Representation Reference: REF020.5 Name: Town Planning.co.uk on behalf of consultee	Refers to: Infrastructure Delivery Plan August 2021	Legal compliance and soundness: Plan is legally compliant and complies with the Duty To Cooperate. Plan is unsound.	Comments: The site will generate demand of additional pupil numbers. The Infrastructure Delivery Plan indicates that site HS14 will generate a need for 20 primary school places and 15 secondary school places. Obtaining school capacity figures is not straightforward, have used the school capacity figures published by Ofsted. It is accepted that parental choice impacts upon school planning and forecasting, would be reasonable to assume that development within Tuxford will impact on pupil numbers at Tuxford Primary Academy and Tuxford Academy. Tuxford Primary Academy has a capacity of 240 pupils, but the school is oversubscribed by having 333 pupils. The 2021-22 Nottinghamshire school admission statistics anticipates the roll to be 339 pupils. This represents an anticipated roll of 99 pupils in	Suggested changes: Delete HS14 and allow the review of the Tuxford Neighbourhood Plan to consider other reasonable alternatives as part of a comprehensive analysis of other potential sites around Tuxford. In Tuxford there are a number of potential previously developed sites or sites where existing uses no longer represent the most beneficial use. These sites	Officer comments: The education requirements in the Local Plan and the Infrastructure Delivery Plan have been provided by Nottinghamshire County Council, the Local Education Authority. NCC have not sought a new primary school in Tuxford as a result of the allocation of 75 dwellings in the Local Plan, or as a result of the cumulative impact with other committed growth.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>excess of capacity, before any additional development occurs. Site HS14 and the committed housing of 105 units will generate additional demand for a further 40 pupils (NP04 – 17; commitments - 23). This will result in an anticipated roll of 139 pupils in excess of capacity. Tuxford Academy has a capacity of 1,462 with current numbers standing at 1,554. The 2021-22 Nottinghamshire school admission statistics anticipates the roll to be 1,550 pupils. This represents an anticipated roll of 88 pupils in excess of capacity, before any additional development. Site HS14 with the committed 105 other dwellings collectively generate additional demand for a further 31 pupils (HS14 – 13; other commitments 18). This will result in an anticipated roll of 119 pupils in excess of capacity. (This would be increased by development outside Tuxford but within the catchment area e.g. East Markham, and beyond Bassetlaw into Newark & Sherwood). Although financial contributions will be sought for expansion, it is noted that the Infrastructure Delivery Plan assumes that this additional capacity can be accommodated within expansion at existing schools. The Primary Academy site measures 11,991m2 including the Sure Start Centre and Nursery. The Primary Academy operates on a constrained site with no additional land available for expansion. Nottinghamshire County Council states that a 210 pupil Primary</p>	<p>may more appropriately used for residential development with their existing use relocated to modern premises on an industrial estate e.g. land to the rear of 10 Newcastle Street; Former Goods Yard on Lincoln Road; the Platts Harris site; and Land around Eastfield Farm.</p> <p>Other potential sites around Tuxford would have a better relationship to existing built form such as LAA087 (NP11), which if assessed as part of an overall strategy for the town could allow the opportunity for a new primary school to be created as part of an extended education campus next to Tuxford Academy as part of a new mixed-use allocation including new housing.</p>	

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>School requires a gross area of 10,900m², with a 420 pupil Primary School requiring a gross area of 19,300m². With the increased pupil numbers arising, Tuxford Primary Academy will potentially have 382 pupils. It is only sufficient in size for a 210-pupil school which is less than its designed capacity. The school site will be around 8,450m² too small substantially harming primary education in Tuxford. The Local Plan should be planning for a second site or the relocation of the school to a new site and redevelopment of its existing site for housing. There would seem to be more logic in planning for a more comprehensive development centred on LAA087 (NP11) the Ashvale Road commitment and a new primary school created as part of an extended education campus next to Tuxford Academy.</p>		
<p>Representation Reference: REF033.4</p> <p>Name: Stone Planning Services Limited on behalf of Charterpoint (NG22) Limited</p>	<p>Refers to: Infrastructure Delivery Plan (August 2021) and Appendix 1 (Sept 2021) and The Bassetlaw DC Whole Plan and Community Infrastructure Levy Viability Assessment 2019</p>	<p>Legal compliance and soundness: Plan is legally compliant and complies with Duty to Cooperate. Plan is unsound.</p>	<p>Comments: The Infrastructure Delivery Plan, August 2021 is a 'live' document (para 1.1.4). This points to an iterative, review-based approach, there are substantive gaps in cost information which raise questions of how the Local Plan is to be delivered. In addressing incomplete evidence, there appears a 'loose' framework of dialogue, flexibility and prioritisation, with external funding and innovative approaches being alluded to. Local Plan para 5.1.61 states that "An Infrastructure Delivery Plan (IDP) has been prepared alongside this Plan, which identifies the key infrastructure requirements, anticipated</p>	<p>Suggested changes: Update the IDP.</p>	<p>Officer comments: The Infrastructure Delivery Plan is a living document updated as the Plan progresses to provide the most up to date position, based on evidence base work and infrastructure partners informed views. It is considered the IDP Update, April 2022 provides a robust, up to date and proportionate position to inform the</p>

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>costs and expected delivery. The Infrastructure Schedule contained within the IDP sets out an overview of the key infrastructure requirements necessary to deliver this Plan.” It appears the costs of ‘key’ infrastructure are omitted and the IDP is not complete. In relation to the Bassetlaw Garden Village, Appendix 2 is helpful in identifying cost heads and costs. It is not complete and important questions emerge as to how “essential” infrastructure is to be funded and when. The overall viability picture not robust. The local plan is not sound. The funding of affordable housing delivery on such a large site needs to be factored into the viability equation. The overall infrastructure cost total is £1,717,900 or £3,435 per dwelling. Para 4.9 makes clear that the Viability Assessment indicates that developer contributions (£3,500 maxima) justify exemption from CIL. Although it is unclear whether a level of CIL is anticipated from some commercial elements. Appendix 2 does not appear to include ‘essential’ highways and transportation costs. Essential infrastructure is not expected to be funded through developer contributions and Section 106, despite what the table says because the “cap” of £3,500 per dwelling would be exceeded. Where large sites are CIL-exempt, this indicates that a large infrastructure funding gap exists and according to para 8.2, this will be higher than £50m. Paragraph 8.5 sets out that £73.9m will be needed to deliver transport</p>		<p>deliverability of the site allocations in the Local Plan. It should be noted that the IDP accompanying the May 2022 Second Addendum provides an up to date position with regard to the funding gap, anticipated developer contributions and CIL contributions from Local Plan growth. It is also considered that the Whole Plan Viability Assessment May 2022 provides a robust and up to date position relating to financial viability of development, including for affordable housing. This confirms the approach taken to CIL and the strategic sites. By doing so, it is considered that any potential inconsistencies have been addressed. This includes the approach taken to developer contributions per dwelling for the strategic CIL exempt sites. The May 2022</p>

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>infrastructure– of those schemes which are costed, so the figure will be higher. Para 7.6 addresses priority in terms of items being ‘essential’, ‘necessary’ or ‘desirable’. “Essential” items of highways/transportation infrastructure are not costed yet are deemed “essential” and are pre-requisite, facilitate delivery, and ensure that there is no significant detrimental impact. There is, an inconsistency; essential infrastructure costs are not included and if £3,500 is a cost ceiling and such sites are CIL-exempt, then how is the funding gap addressed? Para 1.22 and 6.11 of the Whole Plan & CIL Viability Assessment (October 2019) states that the strategic site tests make it clear that the significant site specific Section 106 contributions will render the imposition of additional CIL Charges economically unviable, and it is recommended that the 10 strategic sites (including Bassetlaw Garden Village) are treated as zero rated CIL Charging Zones. The CIL Draft Charging Schedule (August 2021) refers to the IDP at paras 3.3-3.5, with the total cost of infrastructure costing in excess of £89m and justifying the retention and review of CIL across the District. Paras 4.1-4.2 outline the calculus based on £20 per sq m (residential) sufficient to raise £18m. At para 3.15, is the rationale for zero levy rates on larger sites relied upon to deliver the Local Plan spatial strategy. Based on CIL generation the infrastructure funding gap can be expressed as £71m. There are</p>		<p>Second Addendum withdraws the Garden Village from the Local Plan and the January 2022 Addendum withdraws Marnham as an employment allocation.</p>

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			no costs for a range of infrastructure at the Garden Village highlighted by Appendix 2. Where other Local Plan evidence includes consideration of junctions, highways works, a railway station, it would be reasonable to have some indicative costs drawn. A separate table in Appendix 2 deals with Apleyhead Junction and omits costs for: junctions improvements on the A57, foot/cycle links to nearby development, Wastewater and water management. The assessment of High Marnham shows contributions to a number of highway improvement schemes and utilities but no costs. High Marnham covers 118 hectares of employment land. If deliverability was to prove unviable then the employment strategy set out in the Plan would fail. In the absence of viability information its deliverability cannot be relied upon. The cost evidence to support delivery of strategic sites is inadequate.		
Representation Reference: REF043.21 Name: Gladmans	Refers to: Developer Contributions and infrastructure delivery	Legal compliance and soundness: Plan is legally compliant and complies with Duty to Cooperate. Plan is unsound.	Comments: The allocation of Bevercotes Colliery as an additional Priority Regeneration Area for employment development can provide the necessary mitigation as part of appropriate conditions or planning obligations associated with the redevelopment of the site where necessary. Offers the opportunity to deliver improved highway and junction access to the A1 network along the B6387 at the Twyford Bridge junction. This will ensure the infrastructure along the A1 and A57 corridor is able to support the key	Suggested changes: No policy changes suggested regarding developer contributions	Officer comments: The January 2022 Addendum Policy ST7 identifies Bevercotes Colliery as an employment site (EM008a). It is considered this addresses this matter.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			logistics and economic growth identified in the A1 Corridor Logistics Assessment Report and allow the district to capture the benefits such growth will deliver.		
Representation Reference: REF048.25 Name: Nottinghamshire County Council	Refers to: Infrastructure Delivery Plan	Legal compliance and soundness: Not specified	Comments: Sites HS1, HS7, HS13, GV, SEM001, EM008 are earmarked to contribute to extended bus services through S38/S278. Bus service extensions should be made as financial contributions to NCC through S106. Agreements through s278/s38 relate to physical works to the highway and are not used to secure funding. Site HS3 is earmarked to contribute to secondary education through CIL, however this site is for 120 dwellings and therefore is one of the major sites (50+ dws) that would be CIL-exempt. The funding mechanism should therefore be S106. There is some discrepancy between the Plan wide Viability Study and the IDP. The Viability Study lists £7.3m as the contribution sought towards secondary school places at Peaks Hill Farm, whereas the IDP has the correct NCC POS sourced figures. The Viability Study does not refer to the provision of a school at Ordsall South which is referenced in the IDP.	Suggested changes: <ul style="list-style-type: none"> • Contributions towards bus service extensions should be made as financial contributions to NCC through S106. • Site HS3 Radford Street: Should require s106 funding for education, not CIL monies. • The Viability Study lists £7.3m as the contribution sought towards secondary school places at Peaks Hill Farm, whereas the IDP has the correct NCC POS sourced figures. The Viability Study does not refer to the provision of a school at Ordsall South which is referenced in the IDP. 	Officer comments: It is considered that the Infrastructure Delivery Plan Update April 2022 and the Whole Plan Viability Assessment May 2022 address the matters raised.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Representation Reference: NRF-REF006.4 Name: Barton Willmore on behalf of Howard (Retford) Ltd	Refers to: Infrastructure Delivery Plan August 2021	Legal compliance and soundness: Not indicated as response was not submitted on Reg19 representation form	Comments: Chapter 12.3 provides the Council’s approach to the provision of infrastructure. Support the timely delivery of infrastructure on site that is related to the proposed development. 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. Having regard to Policy ST58 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.	Suggested changes: Update the IDP	Officer comments: It is considered that the Infrastructure Delivery Plan Update April 2022 addresses the matters raised.

Housing Trajectory

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
<p>Representation Reference: REF040.4</p> <p>Name: McLoughlin Planning on behalf of land owner</p>	<p>Refers to: Housing Trajectory Appendix 3</p>	<p>Legal compliance and soundness: Legal compliance and compliance with Duty to Cooperate not indicated.</p> <p>Plan is unsound.</p>	<p>Comments: High percentage of windfall sites proposed to meet the Council's identified need. Section 7 of the Council's Housing Land Supply Position, Housing Trajectory and Windfall Allowance Background Paper advises that there are already 874 committed sites with planning permissions on sites smaller than 1 hectare. Further smaller to medium sites are often delivered faster than larger sites. Therefore, it is considered that the emerging Local Plan is likely to burn through much of its identified housing sites within a short period of time. This raises serious doubts about the Council's housing trajectory figures for the plan period.</p>	<p>Suggested changes: The Council should allocate LAA206 on the edge of Worksop under Policy ST15. The site is deliverable and has a reliable housing developer ready to bring the site forward.</p>	<p>Officer comments: The Council has taken a prudent approach in relation to site delivery. It is based upon historic delivery rates in the district, also takes account of information on build-out rates provided by developers and site promoters.</p> <p>There is no need for the allocation of more sites. The windfall allowance of 100 dwellings pa is considered to be justified based upon the historical evidence. There are also sites with planning permission which are expected to deliver beyond 2038 such as Harworth Colliery. Some of the proposed new allocations are also expected to deliver beyond the plan period. The Council considers the delivery rates to be realistic to meet the assessed housing need. The Local Plan provides for more than the housing requirement</p>

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
					with an 18% buffer to provide flexibility. There is therefore no requirement to allocate additional sites in Worksop.

SA and HRA

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
<p>Representation Reference: REF009.5</p> <p>Name: Fisher German on behalf of land owner</p>	<p>Refers to: Sustainability Appraisal (SA) Report (August 2021)- Chapter 4, paragraph 4.18 of the 2021 SA</p>	<p>Legal compliance and soundness: Legal compliance – not specified</p> <p>Duty to cooperate – not specified.</p> <p>Plan is unsound.</p>	<p>Comments: The SA states that the change doesn't impact the findings reported it is notable that the August 2021 SA is still assessing Harworth & Bircotes as receiving 21% of the overall housing growth (see Chapter 4, paragraph 4.18 of the 2021 SA). As Harworth & Bircotes is now receiving 16% of the growth, the SA should be assessing the impact of the reduction in housing the town. Whilst the increase in numbers in Worksop may result in 'no affect' for Worksop it is considered that the decrease in housing numbers for Harworth & Bircotes will unjustifiably limit the growth of the town.</p>	<p>Suggested changes: Allocating more homes to Harworth & Bircotes will enable the Plan to encourage further growth later in the plan period. NPPF Paragraph 67 sets out that planning policies should identify a supply of specific deliverable sites for years one to five and "specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan". The current commitments may deliver homes for the town for around a 10 year period, not allocating further homes now may stifle development in years 11 – 15. To ensure the ongoing</p>	<p>Officer comments: No change to the SA considered necessary.</p>

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
				regeneration of Harworth & Bircotes can continue into the latter years of the plan period, it will be important to provide enough homes to enable this to occur.	
Representation Reference: REF014.22 Name: National Trust	Refers to: Bassetlaw Sustainability Appraisal Report, August 2021	Legal compliance and soundness: Legal compliance of plan - not specified. Plan is unsound. Compliance with Duty to Co-operate – not specified	Comments: Early iterations of the Sustainability Appraisal presented a generally negative assessment of the high growth options for the Bassetlaw Local Plan, but despite this, high growth targets have been selected and further elevated during the course of plan preparation. While a significant negative effect on cultural heritage has been noted by the Sustainability Appraisal, potential impacts on the character of the rural setting of Clumber Park Registered Historic Park and Gardens have largely been overlooked.	Suggested changes: N/A	Officer comments: The SA assessment was informed by comments from the Council's Conservation team and Archaeology adviser. The Council's Conservation team state that given the depth of the woodland belt between the A57 and the developable part of the Apleyhead, it is unlikely that typical industrial development would be visible from the south, south west or south east. The site is also no longer visible from Osberton, being screened by 19th century trees and landscaping. There is no concern with the principle of development on this site, subject to the retention of

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
					the woodland buffer alongside the A57 being retained, and the scale of buildings would need to have regard to the historic setting – buildings which are overly tall would fail to preserve the setting of Clumber Park so would not be supported. Conservation previously submitted comments relating to the Garden Village, but the May 2022 Second Addendum withdrew the site from the Plan.
Representation Reference: REF020.11 Name: Town Planning.co.uk on behalf of consultee	Refers to: Sustainability Appraisal August 2021 – Assessment of HS14	Legal compliance and soundness: Plan is legally compliant and complies with the Duty To Cooperate. Plan is unsound	Comments: As highlighted previously the Sustainability Appraisal (SA) contains contradictory information in relation to the assessment of site HS14. The same contradictions are contained in the November 2020 SA. As such the SA remains fundamentally flawed and undermines confidence in whether the site has been properly assessed. The site is assessed in Table 6.5 and in the Table A6 - 45: Land south of Ollerton Road, Tuxford (NP04). It should be noted that the references in the SA have not been amended in the SA Review in relation to the Bassetlaw Local Plan revised policies (June 2021 Regulation 18 Public Consultation). The	Suggested changes: Delete the proposed site HS14 and allow the review of the Tuxford Neighbourhood Plan to consider other reasonable alternatives as part of a comprehensive analysis and consideration of all other potential sites around Tuxford including both	Officer comments: No changes to the SA considered necessary. It is considered that the SA has been carried out in line legislation, national policy, and the methodology set out in the SA Report. It is considered that the respondent is comparing the effects of the site itself (policy off) with the effects of the policy.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>difference between the SA tables involve more than a third of the SA assessment criterion, as such this is a substantial level of difference. It fails to have taken into account the finding of harm in the 'Landscape Assessment Addendum Report' (October 2020). Table A6-45 concludes that the site is likely to have a significant negative effect on the SA objectives of 'land use and soils' and 'cultural heritage'. Agree with these conclusions which weigh heavily against the suitability of this site to be allocated. It concludes that there would be a negative effect on the SA objective of 'landscape and townscape'. This underplays the harm identified in the 'Landscape Assessment Addendum Report' (October 2020). In our judgement the SA appears to incorrectly assess other aspects of the site as follows: Whilst the site location does provide reasonable accessibility to some town centre services and facilities there is poor accessibility to some key services including the secondary school and GP surgery. Tuxford suffers from limited accessibility due to the road bridge under the A1 being the only connection between the two halves of the Town. The site is not within 800m of the GP Surgery as the SA suggests, is 910m away from the closest part of the site by the most direct route and 1.6km from the secondary school. The proposed development would result in harm to primary school capacity. Policy 28 does refer to</p>	<p>potential Brownfield and Greenfield sites.</p> <p>Within Tuxford there are a number of potential previously developed sites or sites where existing uses perhaps no longer represent the most beneficial use. These sites may more appropriately used for residential development with their existing use relocated for example to modern premises on an industrial estate. Such sites could include land to the rear of 10 Newcastle Street; Former Goods Yard on Lincoln Road; the Platts Harris site; and Land around Eastfield Farm.</p>	

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>contributions towards the improvement of the existing public right of way at Long Lane for pedestrian access into the town. Long Lane is not an adopted highway and has no clear ownership. This policy requirement cannot be delivered and this will make the social integration of this site more difficult. The proposal involves no regeneration benefits, and the issues of accessibility and integration and impact on primary school capacity means that the proposal has a 'mixture of positive and negative effects' on Regeneration and Social Inclusion. In terms of Health and Wellbeing the poor accessibility to the GP Surgery; along with the need to enter an area of poorer air quality and a noise corridor (under the A1) to get to the GP Surgery; and the distances required to access other primary healthcare facilities with harm to primary school capacity means that the proposal has a 'mixture of positive and negative effects' on this. Any allocation in Tuxford will result in vehicle movements through the A1 underbridge, this is an area of poorer air quality and as this provides the only pedestrian and cycle linkage between the two halves of the town; it must be deemed 'uncertain' what effect the site would have on the air quality. Parts of Long Lane is at high risk of surface water flooding and the Environment Agency surface water flood risk mapping indicates that the farmland proposed to be allocated is the</p>	<p>In our view other potential sites Brownfield and Greenfield around Tuxford would have a better relationship to existing built form such as LAA087 (NP11), which if properly assessed as part of an overall strategy for the town could allow the opportunity for a new primary school to be created as part of an extended education campus next to Tuxford Academy as part of a new mixed-use allocation including new housing.</p>	

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>source of this surface water. The allocation has the potential due to the topography to exacerbate this surface water flood risk, consider that it should be 'uncertain'. The site is within the shadow of an existing wind turbine, concern about the inter-relationship between this wind turbine and development with regard to noise and shadow flicker. No assessment of this aspect, there is potential that new development could result in the need to cease use of the wind turbine. Consider it 'uncertain' what effect the site would have on the climate change. Impact on landscape and townscape the comments of BDC on the Neighbourhood Plan concluded that: "The landscape is very open, with long distance views to the south west. Character: the site adjoins a residential area which is suburban in character with residential development to one side. However, the site is not contained and is very open in character." This is not currently reflected in the SA conclusions. The site has no existing boundaries to the south or west and would represent an artificial sub-division of a large area of high-quality farmland. The 'Landscape Assessment Addendum Report' (October 2020) concluded: "The site adjoins the built-up area however, it clearly extends into open countryside and occupies a prominent position in the local landscape. It is a medium-sized site which could make a reasonable contribution to</p>		

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>the overall dwelling requirement. However, the harm to open countryside and landscape interests that would result from development is likely to outweigh the benefits of new housing.” This harm is in underplayed in the SA document. The site is within the Mid-Nottinghamshire Farmlands Landscape Character Area and Landscape Policy Zone MN11 classified for conserve and reinforce. The landscape is deemed ‘good’ with a sensitivity of ‘moderate’. Introduction of a stark urban edge would harm the existing landscape character where the transition from the open fields to the town is mitigated by existing mature boundary treatments; the dipping topography; and the single storey nature of the western half of The Pastures. The site will be highly prominent from the western approach along the A6075 where the site will be unduly visible due to the approach road being over 10m in height above the site. The A6075 is at 75m AOD west of the Walkers industrial estate and is 73m AOD at the Walkers industrial estate; the site is at a height of around 60 to 62m AOD getting clear views of the edge of Tuxford; these views become more prominent as you reach the Walkers industrial estate. Given the conclusions of the ‘Landscape Assessment Addendum Report’; the landscape character sensitivity; the lack of any existing boundaries; and the prominence; the site would have a ‘significant negative’ effect.</p>		

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>The SA fails to comply with paragraph 32 of the NPPF. Harm to these SA objectives would be exacerbated by the need to create a 2m wide footway along the highway which would remove the existing hedgerow along Ollerton Road. Street lighting will also require extending accordingly as will the village gateway signing and road markings. This will significantly change the western gateway into the town and result in a harsh urban gateway rather than the semi-rural gateway that exists. It would be a stark bolt-on to the sensitive edge of Tuxford conflicting with Policy ST2 that requires: "The location and size of the proposal does not conflict with the character and built form of that part of the settlement." and Policy ST37 that requires development to: "Create a soft edge between the existing built form and the countryside." This change from semi-rural to harsh urban character would change the character and appearance of the Tuxford Conservation Area which runs along the southern side of Ollerton Road. This would harm the significance of this designated heritage asset and the provision of housing would not represent a public benefit that is sufficient to outweigh this harm, particularly when there are reasonable alternative sites available elsewhere that do not result in heritage harm and when the site is not required to meet the actual strategic housing need due</p>		

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>to the Local Plan choosing to over-allocate housing. Consequently, in our view the statutory duty in s72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 on local planning authorities to preserve and enhance conservation areas while undertaking their planning duties. The adjacent part of the Conservation Area is within the Market Place character area: "The historic layout and plan form of the character area is predominantly characterised by buildings that front onto the street, often directly onto or close to the highway. Any new development, including infill or replacement, should seek to respect this character." If this character were to be followed this would introduce substantial harm through the strong urbanisation of Ollerton Road. Modern suburban type of development that would be likely in a modern housing estate would be contradictory to this character which would also harm the character or appearance of the Conservation Area gateway. The proposal is contrary to Paragraph 200 and 127 c) of the NPPF. The open rural character of this gateway to Tuxford was considered in Appeal APP/A3010/W/18/3197118 for the site on the opposite side of the A6075. The Inspector stated: "The significance of the appeal site as part of the conservation area is derived from its openness which reflects the historic context of the rural settlement and its relationship with</p>		

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			the surrounding agricultural land. Whilst the site has not been in agricultural use for some time it has remained free from development and, in its village edge location, preserves the rural character context and setting of the built environment.” The Inspector was clear that the site made an important contribution to the ‘village’s countryside setting’. HS14 would be far greater in size; would be more prominent in landscape views than that appeal site resulting in greater levels of harm than the Inspector used to dismiss the appeal.		
Representation Reference: REF032.3 Name: Town Planning.co.uk	Refers to: Sustainability Appraisal (SA) in Table A6-58	Legal compliance and soundness: Plan is legally compliant and complies with the Duty to Cooperate. Plan is unsound.	Comments: Table A6-58 scores the High Marnham Energy Park as a poor site for employment. Despite this it is still allocated which means that the Local Plan has ignored its own SA. The SA incorrectly assesses aspects of the site: The site will offer employment but in a location the evidence says is remote from the labour supply as such the economy and skills criterion is over scored. Accessibility to public transport: the SA incorrectly says that part of the site is within 400m of a bus stop. The nearest bus stop is 1.7km from the site access and 2.5km from the centre of the site and is served by school and infrequent daytime services. Transport will have a ‘significant negative’ effect. Climate change: although the site is proposed to generate renewable energy, as an employment location the site is not accessible by public transport or	Suggested changes: Change Requested Delete the proposed site EM008: High Marnham Energy Hub for employment. If wanted it could be retained for the siting and production of renewable energy, such as a solar farm without any employment provision.	Officer comments: It is considered that the SA has been carried out in line legislation, national policy, and the methodology set out in the SA Report. It is acknowledged that there was a factual error relating to the proximity of the site to a bus stop. It is considered that the SA that accompanied the January 2022 Addendum addressed this matter.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>other sustainable means of transport. It will be wholly reliant upon use of the private car and HGVs so transport movements will contribute to harm to climate change. Consider that the proposal has a 'mixture of positive and negative effects' means that the overall position is uncertain. Landscape: the site is prominent in the Trent valley, particularly from South and North Clifton to the east; as well as from High Marnham and Fledborough. The site is highly visible from the National Cycle Route 647 and the Fledborough viaduct. The policy sets out no specific mitigation from these viewpoints so would have a 'negative' effect on the landscape.</p>		
<p>Representation Reference: REF033.2</p> <p>Name: Stone Planning Services Limited on behalf of Charterpoint (NG22) Limited</p>	<p>Refers to: Sustainability Appraisal August 2021 – Apleyhead site assessment.</p>	<p>Legal compliance and soundness: Plan is legally compliant and complies with Duty to Cooperate.</p> <p>Plan is unsound.</p>	<p>Comments: The Local Plan looks to allocate a major employment site at Apleyhead Junction, and this does not adequately consider the harm to transport infrastructure and the local environment. The Sustainability Appraisal does not demonstrate how the Plan has addressed relevant economic, social and environmental objectives, including opportunities for net gains. The WYG Junction Assessment Report [January 2020] refers to the construction of 6km of dual carriageway which is not factored into the assessment of the site at Apleyhead Junction. This is important where NPPF para 32 states that significant adverse impacts on objectives should be avoided and, wherever possible,</p>	<p>Suggested changes: The Plan has not fully considered delivery of Apleyhead Junction and the Bassetlaw Garden Village including beyond the plan period.</p>	<p>Officer comments: It is considered that the SA has been carried out in line legislation, national policy, and the methodology set out in the SA Report. The May 2022 Second Addendum withdraws the Garden Village from the Local Plan.</p>

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			alternative options which reduce or eliminate such impacts should be pursued.		
Representation Reference: REF033.8 Name: Stone Planning Services Limited on behalf of Charterpoint (NG22) Limited	Refers to: Sustainability Appraisal	Legal compliance and soundness: Plan is legally compliant and complies with Duty to Cooperate. Plan is unsound	Comments: Appendix 8 summarises the basis why Markham South was not taken forward and why Apleyhead/A57 was. Refers to an abstract and certain words have been highlighted for comparison. The SA concludes favourably for Apleyhead Junction on the basis that a future application would address adverse impacts. The assessment does not appear to factor-in cumulative impact of the proposed allocation with highways improvements on the A57 corridor referred to in the WYG junction assessment report. The potential widening to dual carriageway along 6km of road would have implications for woodland removal within/adjacent the site. No consideration of the combination of Bassetlaw Garden Village and Apleyhead Junction in determining a delivery strategy for those works. Where these costs are unknown (August 2021 IDP), it is a leap of faith to suggest that significant adverse effects are resolvable through a planning application. Yet the White Young Green Junction Assessment informs the position. Mitigation via a planning application can apply to any site. Land at Markham South can address matters of heritage and archaeology via further study with an application similar to Apleyhead. There are no access issues; it was constructed	Suggested changes: The Plan has not fully considered delivery of Apleyhead Junction and the Bassetlaw Garden Village including beyond the plan period.	Officer comments: It is considered that the SA has been carried out in line legislation, national policy, and the methodology set out in the SA Report. The May 2022 Second Addendum withdraws the Garden Village from the Local Plan.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>some years ago. Reference to the Sheffield City Region economic evidence base ignores the well-rounded assessment of Markham South in the Local Plan evidence base. It is trite to say that all of the A1 junctions in Bassetlaw are south of the A1(M). To rely on the Sheffield City Region evidence base would be to negate any economic advantage of the A1 passing through Bassetlaw and south of the A614. The reasoned justification for not taking Markham South forward for allocation includes reference to the Sheffield City Region Economic evidence base, this suggesting that sites to the south of the District and away from the A1M have not been tested in terms of their commercial attractiveness and reduces their deliverability. The Economic Development Needs Assessment considered growth scenarios and potential benefits particularly in terms of a market assessment, informing the Sustainability Appraisal. (EDNA Part 2: Growth Assessment: January 2019; paras 1.1.and 1.2). The A1 Corridor Logistics Assessment August 2021, considers the logistics property market area, a market review, and an examination of the wider market context including reference to the Sheffield City Region and the Nottingham area. The market review considered the A1 corridor from Doncaster to Newark (para 6.1), including agent feedback and market indicators (Section 4). This advice was provided in the context of</p>		

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>progressing the Plan. Para 6.4 states: “The above messages are useful and develop a clear picture of the enhanced role of the A1 in the logistics market. In a period of fast rising demand responding to structural economic change, the lack of supply and policy constraints on the M1 has shifted focus onto the A1 which is able to provide levels of connectivity and labour sufficient to attract strategic occupiers.”</p> <p>The EDNA audit of employment sites includes the Markham South site at para 1.173 as a “commercially attractive location”. Paragraph 4.2 of the Plan refers to the economy capitalising on the District’s locational advantage, in terms of proximity to the A1 and the A57 growth corridors. The SA identifies the Markham South site as within a Minerals Safeguarding Area (Sneinton Gunthorpe Clay), the Nottinghamshire Minerals Local Plan (March 2021) (para 3.84) that: (i) not every non-mineral development proposal within or close to a Minerals Safeguarding and Consultation Areas represents a risk to future minerals extraction; and (ii) development which is in accordance with adopted District/Borough Local Plan allocations which took account of minerals sterilisation and where prior extraction is not feasible or appropriate is exempt from both consultation and safeguarding. Do not consider this to be an impediment to delivery at Markham South. Apleyhead Junction, significant</p>		

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			negative effects are referred to and cumulative negative effects are not factored-in. The conclusion is skewed.		
Representation Reference: REF036.8 Name: Marrons Planning on behalf of Vistry Group	Refers to: Sustainability Appraisal August 2021	Legal compliance and soundness: Plan is legally compliant and complies with the Duty to Cooperate. Plan is unsound.	Comments: Although the Sustainability Appraisal (SA) continues to state that additional levels of growth in Retford could affect flooding, the historic environment and prevailing character, and cultural heritage and landscape and townscape, the site assessments within the Land Availability Assessment (LAA) January 2021 indicates that development could be undertaken at certain locations without causing harm in these respects. The Vistry land at Tiln Lane, Retford (LAA071) indicate that this land could be developed without harm to these features, provided a landscape-led masterplan is taken forward. The LAA states: <i>“BDC Conservation have reviewed the additional evidence / a design solution submitted by the landowner. It is considered that, with an appropriate design which incorporates open space and landscape buffers, it is likely that the site may be suitable for residential development.”</i> The technical information submitted for the Tiln Lane site address the concerns raised in the SA about flood risk and impact on designated wildlife sites. Allocating additional land at Retford would have a positive impact on SA objectives on housing, economy and skills; allocating Tiln Lane provides an	Suggested changes: Should acknowledge that Retford is able to accommodate additional development without adverse harm to features of the natural and built environment. The Vistry land at Tiln Lane is a suitable location for additional development and can be delivered without adverse impacts.	Officer comments: It is considered that the SA has been carried out in line legislation, national policy, and the methodology set out in the SA Report. Whilst the LAA assesses the site as being potentially suitable for development the site has not been selected to be taken forward as a housing allocation as it is considered that there are other more suitable sites available, particularly with regard to access to public transport. Given the size of the site, there is no certainty that the nearest bus service (approximately 700 metres from the centre of the site) would be extended. It is considered that the Sustainability Appraisal, Land Availability Assessment and Site Selection Methodology are consistent with national policy and provide a robust

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			opportunity to secure those benefits without adverse impacts. The SA was concerned that a higher level of growth could contribute towards increased traffic congestion and construction traffic leading to a minor negative effect for transport, air quality and climate change. This is not site specific, and would apply to all locations in the event a higher level of growth were sought.		basis by which to determine the most sustainable sites to be allocated to meet the identified need for housing in the Plan.
Representation Reference: REF043.3 Name: Gladmans	Refers to: Sustainability Appraisal	Legal compliance and soundness: Plan is legally compliant and complies with Duty to Cooperate. Plan is unsound.	Comments: Should ensure that the results of the SA process clearly justify its policy choices. In meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed, and others have been rejected. Undertaking a comparative and equal assessment of each reasonable alternative, the Bassetlaw Local Plan's decision-making and scoring should be robust, justified and transparent.	Suggested changes: None	Officer comments: Noted.
Representation Reference: REF048.11 Name: Gladmans	Refers to: Sustainability Appraisal	Legal compliance and soundness: Plan is legally compliant and complies with Duty to Cooperate. Plan is unsound.	Comments: The number of dwellings to be delivered through small rural settlements has increased substantially from the first Regulation 18 Plan; 1,090 dwellings. The second Regulation 18 Plan increased this figure by 37.8% to 1,502 dwellings and the requirement for this tier of settlement has now increased further to 1,733 dwellings. This has been justified as an attempt to provide a more balanced approach to the distribution of growth between the District's	Suggested changes: The Sustainability Appraisal should fully test the changes to the housing requirement in the rural area in each iteration of the Bassetlaw Local Plan (January 2020,	Officer comments: It is considered that the SA has been carried out in line legislation, national policy, and the methodology set out in the SA Report. The assessment of the spatial strategy is appropriately provided in Chapter 6 of the August 2021 SA Report.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			urban and rural areas, this does not appear to have been fully tested through the latest Sustainability Appraisal.	November 2020, September 2021)	
Representation Reference: REF043.16 Name: Gladmans	Refers to: Sustainability Appraisal	Legal compliance and soundness: Plan is legally compliant and complies with Duty to Cooperate. Plan is unsound.	Comments: Bevercotes Colliery has not been tested through the Sustainability Appraisal for employment uses. The Local Plan does not fully consider all potential employment sites for logistic uses and it is vital that the economic development and regeneration potential of Bevercotes Colliery is recognised. It would be prudent to recognise the site as an additional Priority Regeneration Area providing flexibility in the supply of employment land.	Suggested changes: Bevercotes Colliery site should be tested through the SA for employment uses.	Officer comments: Bevercotes Colliery has the benefit of planning permission for employment use. It is considered that the SA has been carried out in line legislation, national policy, and the methodology set out in the SA Report. This identifies that the SA does not assess sites with planning permission.
Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Representation Reference: REF014.23 Name: National Trust	Refers to: Bassetlaw Habitats Regulations Assessment, August 2021	Legal compliance and soundness: Legal compliance of plan not specified. Plan is unsound. Compliance with Duty to Co-operate	Comments: The Habitats Regulations Assessment paragraph 5.33 states 'Recreational disturbance is listed as the highest level of threat in the IBA factsheet and is therefore also assumed for the [Sherwood Forest] ppSPA. At least 10,047 new dwellings are proposed within the District as a whole through the Local Plan...'. The means of addressing this impact are premised on the Recreational Impact Assessment for the	Suggested changes: N/A	Officer comments: The RIAs were developed in partnership over the last 2 years with a Project Group (which included National Trust). It was acknowledged in the August 2021 Local Plan that the RIA was advanced but the pandemic had affected the latter stages of the delivery

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			Clumber Park SSSI and Birklands and Bilhaugh SAC which has not yet been published.		programme. Following discussion with Natural England, Policy ST40 incorporated an appropriate mechanism to facilitate delivery whilst Policy ST4 identified the site specific measures expected to be sought at the Garden Village. It was agreed that further work was needed to be undertaken with the Project Group following their consideration of the draft RIA works and prior to a strategic solution being put into place. The May 2022 Second Addendum withdraws the Garden Village; this was considered by Natural England to be the driver for the recreational impact assessment and the recommended mitigation. Consequently, the May 2022 Second Addendum amended Policy ST40 (and deleted Policy ST40A introduced to address this matter in the January 2022 Addendum), in accordance

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
					with Natural England’s advice. The content of the recreational impact assessment has been agreed through discussions with partners including Natural England and forms part of the Local Plan evidence base. This is evidenced by a statement of common ground.
Representation Reference: REF039.2 Name: Natural England	Refers to: Habitats Regulations Assessment	Legal compliance and soundness: Plan is Legally Compliant and complies with the Duty to Cooperate. Soundness is not indicated.	Comments: Natural England is satisfied that this document ensures that a full assessment of the proposed policies within the Bassetlaw Local Plan has been carried out and the requirements of the Habitat Regulations have been met. Note that the Appropriate Assessment concluded that Policy ST40 (Biodiversity and Geodiversity), and the draft Recreational Impact Assessment that adverse effects on the integrity of the Birklands and Bilhaugh SAC can be ruled out. Agree and support this approach, would need a commitment that the recommended mitigation can be delivered before any development takes place to ensure compliance with the Habitat Regulations. Acknowledge that the HRA also incorporates a “Shadow” HRA for the Sherwood possible potential Special Protection Area (ppSPA). Agree with the conclusion of the “shadow” Appropriate	Suggested changes: N/A	Officer comments: Noted.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			Assessment that no adverse effects on integrity of the ppSPA would occur as a result of the identified impacts.		