

Bassetlaw Local Plan 2020-2038

Publication Version

May 2022 Consultation - Summary of Representations Schedule

General Comments

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Representation Reference: SA-NRF001.1 Name: Canal and River Trust	Refers to: Bassetlaw Local Plan 2020-2038: Publication Version Second Addendum Consultation	Legal compliance and soundness: Legal compliance, Soundness and Compliance with the Duty to Cooperate not specified	Comments: Note that no changes are proposed of significant impact to our network. Do not wish to make comment on the proposed changes.	Suggested changes: None.	Officer comments: Noted.
Representation Reference: SA-NRF004.1 Name: West Stockwith Parish Council	Refers to: Bassetlaw Local Plan 2020-2038: Publication Version Second Addendum Consultation	Legal compliance and soundness: Legal compliance, Soundness and Compliance with the Duty to Cooperate not specified	Comments: Have been authorised by West Stockwith Parish council to state that they have no major comments to make on this addendum.	Suggested changes: None.	Officer comments: Noted.
Representation Reference: SA-NRF008.1 Name: Mansfield District Council	Refers to: Bassetlaw Local Plan 2020-2038: Publication Version Second Addendum Consultation.	Legal compliance and soundness: Legal compliance, Soundness and Compliance with the Duty to Cooperate not specified.	Comments: Mansfield District Council (MDC) would like to thank Bassetlaw District Council for the opportunity to submit representations on this document. Following a review of the document, confirm that MDC do not want to make any further representations with regard to the Bassetlaw Local Plan 2020-2038: Publication Version Second Addendum.	Suggested changes: None.	Officer comments: Noted.
Representation Reference: SA-REF007.1	Refers to: Bassetlaw Local Plan 2020-2038: Publication	Legal compliance and soundness:	Comments: HE has no issues to raise in terms of its historic environment remit in relation to	Suggested changes: None.	Officer comments: Noted.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name: Historic England	Version Second Addendum Consultation	Plan is legally compliant, sound and complies with the Duty to Cooperate.	the soundness and legality of the draft Plan and Duty to Cooperate.		
Representation Reference: SA-REF010.1 Name: The Coal Authority	Refers to: Bassetlaw Local Plan 2020-2038: Publication Version Second Addendum Consultation	Legal compliance and soundness: Plan is legally compliant, sound and complies with the Duty to Cooperate.	Comments: Within Bassetlaw District area there are some recorded coal mining features present at surface and shallow depth including; mine entries, fissures and reported surface hazards. These features may pose a potential risk to surface stability and public safety. Consideration will need to be given to the risks posed by these features if new development proposals come forward in areas where the recorded coal mining features are present. Any formal planning application submitted for development in these area would need to be supported by a Coal Mining Risk Assessment. Confirm that the Planning team at the Coal Authority have no specific comments to make on the changes proposed.	Suggested changes: None.	Officer comments: Noted.
Representation Reference: SA-NRF016.1 Name: Sport England	Refers to: Bassetlaw Local Plan 2020-2038: Publication Version Second	Legal compliance and soundness: Plan is legally compliant, sound and complies with	Comments: Thank you for reconsulting Sport England on the Addendum. Would not wish to raise any issues with the proposed deletions and additions and confirm that the plan is	Suggested changes: None.	Officer comments: Noted.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
	Addendum Consultation.	the Duty to Cooperate.	considered as far as Sport England is concerned Legally compliant; Sound and Complies with the duty to co-operate.		
Representation Reference: SA-NRF017.1 Name: Nottinghamshire County Council	Refers to: Bassetlaw Local Plan 2020-2038: Publication Version Second Addendum Consultation	Legal compliance and soundness: Legal compliance, compliance with the Duty to Cooperate and soundness not specified.	Comments: Confirm that the County Council has no comment to make on the proposals in the Second Addendum to the Local Plan.	Suggested changes: None.	Officer comments: Noted.
Representation Reference: SA-NRF019.1 Name: Avison Young on behalf of National Grid	Refers to: Bassetlaw Local Plan 2020-2038: Publication Version Second Addendum Consultation	Legal compliance and soundness: Legal compliance, compliance with the Duty to Cooperate and soundness not specified.	Comments: National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators, so it can reach homes and businesses. National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use. National Grid Ventures (NGV) is separate from National Grid's core regulated businesses. NGV develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean	Suggested changes: None.	Officer comments: Noted.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			energy future for consumers across the UK, Europe and the United States. To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets.		
Representation Reference: SA-NRF020.6 Name: Rotherham Metropolitan Borough Council	Refers to: Duty to Cooperate	Legal compliance and soundness: Legal compliance, compliance with the Duty to Cooperate and soundness not specified.	Comments: Duty to Co-operate meetings have taken place, and co-operation between Bassetlaw District Council and Rotherham MBC is ongoing on the Local Plan and the A57 corridor. To address concerns regarding the A57 corridor, joint work is ongoing between Bassetlaw District Council, Nottinghamshire County Council, Rotherham Metropolitan Borough Council and National Highways working towards an A57 Improvement Plan. Welcome the preparation of an A57 Corridor Statement of Common Ground and will provide comment on that document when prepared. Mindful that these two Statements of Common Ground shall not differ in their intent and reflection of local concerns. In light of the climate emergency, aim to secure agreement	Suggested changes: None	Officer comments: Noted.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			between the bodies concerned, that any impacts on Rotherham's network (especially but not only with respect to the impact of increased carbon emissions) are mitigated so the effect of the Bassetlaw Local Plan is at least neutral relative to baseline.		

Introduction

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Representation Reference: SA-REF004.1 Name: Pegasus Group on behalf of Barratt Homes	Refers to: Introduction - Paragraphs 2.2 to 2.9	Legal compliance and soundness: Plan is legally compliant and complies with the Duty to Cooperate. Plan is unsound.	Comments: Should be read alongside our previous submissions to the Publication Plan and Addendum paragraphs are 2.2 to 2.29. The proposed housing requirement is unsound as it is not justified or consistent with national policy. The 2nd Addendum identifies an increase in planned jobs from 9,735 to 9,852 over the plan period yet suggests a reduction in the housing requirement over the same period. The reduction over the plan period relates to 162 dwellings (10,638 to 10,476) or a reduction of 9 dwellings per annum (dpa) (591dpa to 582dpa). Whilst the reduction in the housing requirement is not substantial it is considered unsound.	Suggested changes: <ul style="list-style-type: none"> Based upon our assessment the reduction in the economic-led housing need figure is unjustified and should be retained at that identified in the previous plan. Argue given the increase in job creation there is an argument to increase the housing requirement. The development boundaries should be relaxed. This should include the identified commitments e.g. Langold 15/01605/OUT. Ideally to enable the delivery of windfalls they should be greater in scope. Additional allocations and/or reserve sites. Reserve sites could 	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 evidence provides a robust, up to date basis to inform the approach taken to the housing requirement. 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. There is, therefore no need to allocate additional or reserve sites.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
				<p>be held in abeyance until required either due to a failure to meet the housing requirement or other unforeseen issues. This would assist in ensuring that the Local Plan met its housing requirement. Figure 1 Parcels B and C, attached would provide an ideal location adjacent an existing commitment for allocation or reserve site.</p>	

Vision and Objectives

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Representation Reference: SA-REF002.1 Name: Natural England	Refers to: Strategic Objectives – Paragraph 4.16. Strategic Objective 11	Legal compliance and soundness: Plan is legally compliant and sound. Plan complies with the Duty to Cooperate.	Comments: Support new strategic objective 11 as it will strengthen the Plan’s approach to increasing the resilience of the impacts of climate and change and encourage the use of integrated water management.	Suggested changes: None.	Officer comments: Noted.
Representation Reference: SA-REF012.1 Name: National Trust	Refers to: Vision and Objectives - SO11	Legal compliance and soundness: Legal compliance and compliance with the Duty to Cooperate not indicated. Plan is unsound.	Comments: Concerned to note the removal of the reference to ‘making more sustainable use of land’ from Strategic Objective 11, particularly bearing in mind that this plan seeks to allocate a very large amount of greenfield land for development.	Suggested changes: None.	Officer comments: It is considered Objective 1 appropriately addresses the sustainable use of land, and the efficient use of resources identified by Objective 11 also applies to sustainable use of land.
Representation Reference: SA-REF013.1 Name: Harris Lamb on behalf of Muller Property Group	Refers to: Vision and Objectives	Legal compliance and soundness: Plan is legally compliant and complies with the Duty to Cooperate.	Comments: Originally prepared on the inclusion of a Garden Village delivering a significant proportion of the District’s employment land requirements along with new housing, in the current Plan Period and beyond. Since the Garden Village has proven to be no longer viable or deliverable, as one of the main landowners has withdrawn their land from development, the Council are correct in deleting the	Suggested changes: Recast the Vision and Objectives to relate to the current spatial strategy that the Plan now seeks to pursue.	Officer comments: It is considered that the Vision and Objectives appropriately reflect the spatial strategy being pursued. The Garden Village had a long lead-in time so was intended to

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
		Plan is unsound.	Garden Village from the Plan. The Vision and Objectives do not appear to have been updated to reflect the revised spatial strategy that the Council will now be pursuing. The only changes set out in the Vision that indicate a change are the deletion of the Garden Village and that Harworth and Bircotes will now accommodate slightly more development than they had previously been expected to accommodate. The Vision and Objectives do not relate to the intended strategy as now proposed as are the same as before with the exception that reference to a Garden Village has been deleted. If the Strategy can be so easily changed to fit current circumstances when a central tenet of it is no longer available it must be questioned whether a Garden Village was needed. The changes to the Vision and Objectives are not fully justified following the deletion of the Garden Village and consider that they are unsound as they do not relate to the revised spatial strategy for development that the Council are now seeking to pursue.		provide additional opportunities towards the end of the plan period. Thus the spatial strategy identified in the Second Addendum, with references to the Garden Village being deleted is considered accurate.
Representation Reference: SA-REF019.1 Name: Spawforths on behalf of HBD	Refers to: Visions and Objectives	Legal compliance and soundness: Plan is not legally compliant and is unsound. Compliance to the Duty to	Comments: Concerned that due to the removal of the Garden Village the Vision and Objectives are no longer being realised. Paragraph 4.3 states that: <i>“The District’s economy will be diverse and thriving. Prominent businesses in the key regional growth sectors of modern manufacturing, logistics, green energy, modern methods of construction and engineering will be capitalising on the District’s locational advantage, in terms of proximity to the A1 and the A57 growth corridors, and Sheffield Doncaster</i>	Suggested changes: <ul style="list-style-type: none"> • Build the vision upon the economic strengths of Bassetlaw (which include the important A1 Corridor) and the wider region in line with the NPPF. • Replace the focus for strategic growth at the 	Officer comments: It is considered that the Land Availability Assessment, Sustainability Appraisal and Site Selection Methodology provide an appropriate basis to assess sites and their suitability to address the district’s employment

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		Cooperate not indicated.	<i>Airport.</i> ” The removal of the Garden Village means that there is no longer a significant focus for growth in the A1 corridor. This will have damaging effects upon the local and regional economy by reducing the opportunity for growth and investment. Gamston Airfield is a suitable alternative location for significant growth and could be an important regional focus point to provide business opportunity, investment and a home for research and development along the A1 corridor. This would provide highly paid jobs within easy reach of population. Gamston Airfield should have been considered as an alternative area for growth to serve the regional economy and deliver the strategic objectives of the plan in line with local economic strategies. Gamston Airfield is already home to thriving logistics and industrial businesses and Thatcham Research (owners of the active Airfield site) who are developing automotive research and development facilities. There is an opportunity to build upon this mix of existing employment uses and to create an industrial, logistics, research and development hub to serve the needs of the regional economy creating a cluster of advanced engineering, research and associated highly paid skilled jobs in Bassetlaw. NPPF paragraph 81 states: “Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken	Garden Village with an employment led strategic focus point for growth at Gamston Airfield.	need. Gamston Airfield as identified by the representation was not known to be available wholly for employment use until the representation was received. Therefore it could not be considered as part of the Local Plan. It is not accepted that the removal of the Garden Village means that there is no longer a focus for growth on the A1 corridor. Several site allocations sit along the corridor; comprising significant economic investment and job opportunities for Bassetlaw and the region. It is considered that the Plan provides an appropriate economic strategy to meet the district’s needs as well as providing an appropriate contribution to the sub-region/regional economy.

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			<p>should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a Global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential.” The Vision and Objectives do not set out a strategy to support economic growth and productivity and the approach is not building upon the strengths of Bassetlaw and the wider region, namely the advantages of the A1 corridor which runs through the district and the potential to grow regionally significant research and development, logistics and automotive testing facilities at Gamston Airfield. NPPF paragraph 82 sets out that Planning Policies should “a) set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local industrial Strategies.” The D2N2 LEP Recovery and Growth Strategy sets out three propositions including Low Carbon Growth, Productivity and connectivity and inclusion. The vision does not address these matters directly and the removal of the Garden Village with its associated employment development means that there is less of a focal point for the type of growth which is needed to serve the regional economy. NPPF paragraph 82 point b) that Planning Policies should: “set criteria, or identify strategic sites, for local inward investment to match the strategy...” and at point d) that Planning Policies should: “be flexible enough to accommodate needs not anticipated in the plan, allow</p>		<p>This has been recognised by the D2N2 LEP. It is acknowledged that the approach taken to the A1 could be better reflected in Objective 3: To support a step change in the local economy by promoting competitive, diverse and sustainable economic growth by providing the right conditions, land and premises in the District to accommodate general employment growth in sustainable locations accessible to the Main Towns and A1/A57 growth corridors, to cater for inward investment, and also; at a sub-regional/regional scale to contribute to meeting an identified need in the large-scale logistics sector along the A1, thereby helping to reduce out-commuting, create more better paid and higher</p>

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			for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances". The current vision and objectives do not achieve this, the removal of a significant focal point for growth in the Garden Village has been removed without replacement. Gamston Airfield provides a suitable alternative for employment led development which should have been considered.		skilled jobs and education and training opportunities to meet local employment needs and aspirations

A Spatial Strategy for Bassetlaw

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Representation Reference: 2128120.1 Name: Resident	Refers to: POLICY ST1 - Bassetlaw's Spatial Strategy	Legal compliance and soundness: Plan is not legally compliant and unsound. Plan does not comply with the Duty to Cooperate.	Comments: Once again the views of the local people are being completely ignored, BDC claim they are being forced to build homes to meet the Government. There is no jobs for these people to do, which means the road congestion & the amount of pollution will rise as these people will have to travel to neighbouring counties for work.	Suggested changes: Stop building on green sites, the environmental impact will be huge.	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 jobs 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 Local Plan is proposing a strategy of greater self-containment, so more people will be able to live and work in the District, thereby reducing out-commuting.
Representation Reference: SA-NRF007.1 Name: Retford Civic Society	Refers to: POLICY ST1 - Bassetlaw's Spatial Strategy Point 1	Legal compliance and soundness: Plan is unsound. Legal compliance and compliance with the Duty to	Comments: Although there have been minor changes to housing figures as a result of the changed Plan end date and removal of the garden village, these do not significantly alter concerns that the Plan is unsound, which we wish the Inspector to consider.	Suggested changes: None.	Officer comments: Noted.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
		Cooperate not specified.			
Representation Reference: SA-NRF007.2 Name: Retford Civic Society	Refers to: POLICY ST1 - Bassetlaw's Spatial Strategy Point 1 – Reference to HS13 Ordsall South	Legal compliance and soundness: Plan is unsound. Legal compliance and compliance with the Duty to Cooperate not specified.	Comments: Object to the proposed extension to Ordsall, if the inspector does find the development acceptable, it could be improved greatly by giving it an identity rather than leaving it as a nameless extension of Ordsall housing.	Suggested changes: None.	Officer comments: Noted.
Representation Reference: SA-REF003.1 Name: TwelveTwenty One Planning on behalf of Hamlin Estates Ltd	Refers to: POLICY ST1 - Bassetlaw's Spatial Strategy – Paragraph 5.1.14	Legal compliance and soundness: Plan is not legally compliant and unsound. Plan does not comply with the Duty to Cooperate.	Comments: The Plan fails to properly account for employment needs. There is an allowance introduced for 'double jobbing'. This is wrong. This is at odds with the Government's aim of upskilling and improving the employment and working conditions of society.	Suggested changes: Remove any allowance for double jobbing and increase the provision for employment to a more appropriate level.	Officer comments: Some people in the District hold down more than one job and therefore the number of workers required will be slightly lower than the number of jobs. Recognition of this is important to ensure the approach taken by the HEDNA is robust. It is considered that the approach taken in the HEDNA Addendum 2022 is justified and consistent with national policy.
Representation Reference: SA-REF003.2 Name: TwelveTwenty One Planning	Refers to: POLICY ST1 - Bassetlaw's Spatial Strategy – Paragraph 5.1.61	Legal compliance and soundness: Plan is not legally compliant and unsound.	Comments: Plan fails to make proper provision for Custom and Self-Build (CSB) housing as required by both the NPPF and NPPG. Sustainable smaller villages are ideal locations for small scale CSB developments. The aim of not specifically allowing such	Suggested changes: To make it clear and explicit that CSB housing will generally be supported on sites adjoining built up	Officer comments: Policy ST30 of the Publication Plan deals with custom and self-build housing. The Policy was not subject to consultation the May 2022 Second Addendum.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
on behalf of Hamlin Estates Ltd		Plan does not comply with the Duty to Cooperate.	development on the edge of Built-Up Boundaries will unduly and unnecessarily restrict such development.	boundaries around named growth villages.	However, Policy ST30 requires housing allocations of 100 dwellings or more to set aside 2% of the proportion of developable plots for custom and self-build housing and encourages Neighbourhood Plans to consider local need for this form of housing.
Representation Reference: SA-REF004.3 Name: Pegasus Group on behalf of Barratt Homes	Refers to: POLICY ST1 - Bassetlaw's Spatial Strategy – supporting text paragraph 5.1.23	Legal compliance and soundness: Plan is legally compliant and complies with the Duty to Cooperate. Plan is unsound.	Comments: The council has in recent years delivered significantly more housing than the 582dpa identified within Policy ST1. Paragraph 5.1.23 acknowledges an average supply of 644dpa. This is 62dpa or nearly 11% greater than the proposed housing requirement. Setting the housing requirement below these average levels which include a pandemic are contrary to the NPPF.	Suggested changes: <ul style="list-style-type: none"> • The increase in potential job creation justifies an increase to the housing requirement. • Development boundaries should include the identified commitments e.g. Langold 15/01605/OUT. • should consider the inclusion of additional allocations and / or reserve sites. Parcels B and C would provide an ideal location adjacent an existing commitment. 	Officer comments: There is a 17% buffer in the supply in case of non-delivery. This provides sufficient flexibility. The housing commitment is allocated by the Langold Neighbourhood Plan and the development boundary reflects that defined by the neighbourhood plan. The Development Boundaries Background Paper explains the approach taken to development boundaries. It is considered the approach taken in the HEDNA Addendum 2022 is robust and appropriate to justify the approach taken to the housing requirement. 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

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					most sustainable sites to be allocated to meet the identified housing need in the Plan.
Representation Reference: SA-REF004.4 Name: Pegasus Group on behalf of Barratt Homes	Refers to: POLICY ST1 - Bassetlaw's Spatial Strategy – Figure 7	Legal compliance and soundness: Plan is legally compliant and complies with the Duty to Cooperate. Plan is unsound.	Comments: Previous representations raised the lack of a supportive framework should the permission on any of the commitments lapse. This is exacerbated by several commitments remaining outside of development boundaries. This is unjustified. A further 635 dwellings are proposed in the Worksop Central Development Plan Document. Whilst this document was the subject of consultation in June / July 2021 it is still at least two-years away from adoption and as such delivery from this source is not yet certain. It is also notable that 90 dwellings have been removed from this source of supply.	Suggested changes: <ul style="list-style-type: none"> • The reduction in the economic-led housing need figure is unjustified and should as a minimum be retained at the level identified in the previous plan. Argue that given the increase in potential job creation there is a justified argument to increase the housing requirement. • the development boundaries are relaxed to include commitments e.g. Langold 15/01605/OUT • to enable the delivery of windfalls they should be greater in scope. • inclusion of additional allocations and / or reserve sites. Reserve sites could be held in abeyance until required either due to 	Officers comments: There is a 17% buffer in the supply in case of non-delivery. This provides sufficient flexibility. It is considered the approach taken in the HEDNA Addendum 2022 is robust and appropriate to justify the approach taken to the housing requirement. The housing commitment is allocated by the Langold Neighbourhood Plan which forms part of the development plan for the district. It is considered that allocation provides a sufficient supportive framework should the permission be delayed. The Development Boundaries Background Paper explains the approach taken to development boundaries and commitments. 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

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				a failure to meet the housing requirement or other unforeseen issues. Parcels B and C, as identified on figure 1 on the accompanying report, would provide an ideal location adjacent an existing commitment for either an allocation or reserve site.	to meet the identified housing need in the Plan. Approximately 90 of the dwellings originally proposed in the Worksop Central DPD have either been delivered or gained planning permission, so are included in the supply as completions or commitments.
Representation Reference: SA-NRF011.1 Name: Resident	Refers to: POLICY ST1 - Bassetlaw's Spatial Strategy – Housing numbers	Legal compliance and soundness: Legal compliance, soundness and compliance to the Duty to Cooperate not specified.	Comments: Concerned about the number of houses being built in Worksop and the surrounding villages. In many cases the developments consist of swathes of houses usually on green fields and farmland with no infrastructure. Most of the houses are not affordable properties and in many cases do not site well among the existing properties. Worksop has had thousands of houses built over the years and it seems thousands more are planned, but there has been no infrastructure to match the growth of properties. When the people of Carlton voted to accept our Local Plan thought it contained all the development that was planned for Carlton but now it seems there are dozens of houses going to be built on the Wimpy Estate which were not mentioned in the Local Plan and properties are going to be built on the site were the James Hince Court nursing home used to be which again were not mentioned in the Local Plan. Do these Local Plans actually mean anything or does the Council just ignore them. Peppers site on Blyth	Suggested changes: None.	Officer comments: It is considered the approach taken in the HEDNA Addendum 2022 is robust and appropriate to justify the approach taken to the housing requirement. It is considered the Local plan appropriately reflects infrastructure partners views, and identifies necessary infrastructure required to support the delivery of the site allocations in the Local Plan. Discussions between the Council and Carlton in Lindrick Parish Council around the principle of Peaks Hill Farm regularly took place during the preparation of the Neighbourhood plan. The emerging Local Plan

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			Road seemed redundant as the houses were already being built and some were even being lived in.		apportioned a percentage of growth to Carlton in Lindrick which has been appropriately planned for within the Carlton in Lindrick Neighbourhood Plan. At the same time, the emerging Local Plan also assessed various locations to accommodate more significant development around the District's main settlements such as Worksop. Peaks Hill Farm was identified through the Local Plan evidence base as the most suitable location to accommodate such development. Although the site is technically within the Parish boundary of Carlton in Lindrick, this is not a consideration in strategic plan making or a reason to rule out future development. The Local Plan recognises the importance of maintaining a physical separation between existing settlements and designates a strategic Green Gap between the village of Carlton in Lindrick and the proposed allocation of land to the north of Worksop.
Representation Reference: SA-NRF011.2	Refers to: POLICY ST1 - Bassetlaw's Spatial	Legal compliance and soundness: Legal	Comments: Concern about how close the houses in Worksop are getting to Carlton. Now there are plans for hundreds of houses at Peaks Hill Farm which will come into the	Suggested changes: None.	Officer comments: Discussions between the Council and Carlton in Lindrick Parish Council around the

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name: Resident	Strategy – Worksop settlement boundary	compliance, soundness and compliance to the Duty to Cooperate not specified.	border with Carlton. Told that Carlton had been allocated a certain number of properties it had to build and suitable sites were being looked at. Many people wanted to know why we needed to build so many properties when there were already over a hundred confirmed for the Peppers site on Blyth Road which falls within the Carlton Boundary. Told that although the site is within the Carlton boundary, Carlton could not claim those houses as they would be counted among the Worksop total. This will set a precedent and Carlton's boundary will just be moved every time more houses are proposed until cease to be a separate village.		principle of Peaks Hill Farm regularly took place during the preparation of the Neighbourhood plan. The emerging Local Plan apportioned a percentage of growth to Carlton in Lindrick which has been appropriately planned for within the Carlton in Lindrick Neighbourhood Plan. At the same time, the emerging Local Plan also assessed various locations to accommodate more significant development around the District's main settlements such as Worksop. Peaks Hill Farm was identified through the Local Plan evidence base as the most suitable location to accommodate such development. Although the site is technically within the Parish boundary of Carlton in Lindrick, this is not a consideration in strategic plan making or a reason to rule out future development. The Local Plan recognises the importance of maintaining a physical separation between existing settlements and designates a strategic Green Gap between the village of Carlton in Lindrick

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
					and the proposed allocation of land to the north of Worksop.
Representation Reference: SA-REF005.1 Name: Barton Willmore (Stantec) on behalf of (Howard) Retford Limited	Refers to: POLICY ST1 - Bassetlaw's Spatial Strategy – Supporting text paragraphs 5.1.11-5.1.22	Legal compliance and soundness: Plan is legally compliant and complies with the Duty to Cooperate. Plan is unsound.	Comments: In accordance with the HEDNA, set out a housing requirement of 582 dwellings per year, the upper end of projected growth scenarios, and provide an employment need buffer of 10% to mitigate economic uncertainty and to accommodate the potential for employment windfall sites. The approach at draft Policy ST1 of a housing need requirement of 582 dwellings per year to reflect the high job growth scenario set out in the HEDNA is supported.	Suggested changes: None.	Officer comments: Noted.
Representation Reference: SA-REF006.1 Name: Grace Machin on behalf of H Machin, J.V.Machin, H.V.Machin and R.G.V.Machin N Grace	Refers to: POLICY ST1 - Bassetlaw's Spatial Strategy – supporting text Paragraph 5.1.7	Legal compliance and soundness: Plan is legally compliant and complies with the Duty to Cooperate. Plan is unsound.	Comments: In October 2021, representations set out that it was not a robust planning strategy to only seek one greenfield allocation on the edge of Worksop to 2037 (now 2038) (Peaks Hill Farm). Continue to submit representations that the site at Gateford Hall Farm is incorrectly identified as Gateford Park when it should be identified as mixed grass and arable farmland. To allocate a single complex greenfield site on the edge of Worksop is not sound planning. 'Omission sites' exist to meet the housing needs of the area. The Proposals Map does identify land for housing owned by my client but has a current planning permission on it for part EMPLOYMENT – 19,000 sq m of Offices. Cross Ref LPA Ref: 14/00213/OUT. A copy of the Committee Report accompanies these representations. These are made in the context of amendments made to: Paragraph 5.1.7 which states that, "Over the past 3 years, Worksop has experienced high levels of housing	Suggested changes: <ul style="list-style-type: none"> Identified land for housing in Worksop on the Proposals Map which is currently employment land in the context of Planning Application 14/00213/OUT. It is not sound to allocate one site on the Northern edge of Worksop (Peaks Hill Farm) when the LPA have identified land for housing on the Proposals Map but not included it within their housing 	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. It is acknowledged that the Policies Map inadvertently identifies the whole site benefitting from 14/00213/OUT as a housing commitment. It is considered that a proposed suggested change to the Policies Map that identifies a mixed use

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			growth, with areas such as Gateford Park seeing over 250 housing completions.	projections and allocations. <ul style="list-style-type: none"> Land South of Gateford Rd and North of Claylands Avenue should be allocated and identified as a Housing Site within the Local Plan as per the Proposals Map as a minima. 	commitment site will address this matter.
Representation Reference: SA-REF008.1 Name: Barton Willmore on behalf of Heyford Developments Ltd	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: 582 dwellings need figure is lower than the target in the previous Plan (10,638 dwellings) due to the Bassetlaw Garden Village now not coming forward. Raise issues with the manner in which the housing supply is distributed within the District, and consider that more growth should be directed to the Large Rural Settlements, particularly Blyth. The difference between the Plan's total minimum requirement (10,476) and the cumulative total of the sites (11,276) should be explained. Principal concern remains with the Rural Settlements and the re-distribution of dwellings following the withdrawal of the Garden Village. The recently adopted Blyth Neighbourhood Plan is reliant on one site to deliver the majority of its housing requirement, despite our view that it is of questionable deliverability / developability. Object to the arbitrary 20% growth cap for Large Rural Settlements, including Blyth. As was the case previously in the Land Availability Assessment (January 2022), the extant permissions and Neighbourhood Plan allocations appear to be as	Suggested changes: <ul style="list-style-type: none"> The difference between the Plan's total requirement (10,476) and the cumulative total of the draft allocations (11,276) should be explained. Clarification as to what level of growth will delivered for each of the Rural Settlements (and whether Neighbourhood Plan allocations have been double counted) and what the contribution is to the overall housing requirement. 	Officer comments: The housing land supply position has been updated to the 31 March 2022 base date and excludes the Garden Village. 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 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

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			follows: Blyth – 77, Carlton – 410, Costhorpe – 0, Langold/Hodstock – 465, Misterton – 163, Tuxford – 86 Total – 1,201 With the completions (198) and 75 new dwellings in Tuxford, this totals 1,474. This is 61 dwellings less than the specified 1,535 dwellings. Under Policy ST2 it requires each settlement to grow by 20%. Clarification is required as to why the draft Plan is providing considerably less than the settlement hierarchy states. Neighbourhood Plan allocations have been double counted. List of commitments should be checked and the relationship between them and the 20% Growth Requirement clarified. The spatial strategy needs to ensure that housing and employment needs are aligned, so that housing is proposed where there is demand for employment. As insufficient growth is directed to Blyth, the Plan will not deliver balanced growth spread across the more sustainable rural settlements.	<ul style="list-style-type: none"> • The growth targets for specific settlements should be updated to contain mechanism for guarding against non-delivery of housing through Neighbourhood Plans. • Further growth should be directed to the sustainable settlement of Blyth. 	additional sites in the rural area. There is a 17% buffer in the supply in case of non-delivery. 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 neighbourhood plan, but without planning permission. This makes a total provision of 121 dwellings for Blyth. This satisfies the growth requirement.
Representation Reference: SA-NRF013.2 Name: Fisher German on behalf of The Hospital of the Holy and Undivided Trinity	Refers to: POLICY ST1 - Bassetlaw's Spatial Strategy – Supporting text Paragraphs 5.1.20 and 5.1.21	Legal compliance and soundness: Legal compliance, compliance with the Duty to Cooperate and soundness not specified.	Comments: It is recognised that the Council have taken the opportunity to review its housing need following an amended 'Standard Methodology' from Government. This is also supported.	Suggested changes: None.	Officer comments: Noted.
Representation Reference: SA-NRF015.1	Refers to: POLICY ST1 - Bassetlaw's Spatial	Legal compliance and soundness: Legal	Comments: This diagram scrubs the Garden Village. The removal of the garden village is welcome but the failure to allocate additional housing to Rural Service Centres	Suggested changes: None	Officer comments: The Local Plan distributes housing growth according to the settlement hierarchy based

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name: Resident	Strategy Figure 6: Key Diagram	compliance, Soundness and Compliance with the Duty to Cooperate not specified	is not justified. Fig 6 shows the lop-sided spread of “Large Villages” – 60% are in the west of the district and “clumped”. How can Blyth, Langold and Carlton fulfil the role granted to them in the text when they are so very close together? They are not providing services to a rural hinterland because the “surrounding villages” are absent. The current spatial strategy (ST1) is lop-sided/west focussed, ignores current Rural Service Centres, is not sustainable, is not justified, fails to comply with 5.1.1/SO5.		upon ability 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’. The rural area is making a significant contribution towards meeting the overall housing need in the District.
Representation Reference: SA-NRF015.2 Name: Resident	Refers to: POLICY ST1 - Bassetlaw’s Spatial Strategy	Legal compliance and soundness: Legal compliance, Soundness and Compliance with the Duty to Cooperate not specified	Comments: The Bassetlaw Sustainability Report consistently rates the proposed settlement hierarchy highly whilst failing to recognise that without the previous cluster model or enhanced Rural Service Centre status; villages with latent demand like Everton, will remain reliant on passing trade for our pubs and school. Without meaningful housing allocations, the additional services won’t come. Everton can expand sustainably – on the south side of the A631 – with space for doctors surgery, dentist, PO and retail. Everton is the only Bassetlaw A631 settlement not to have been by-passed – because the business community at that time would not allow it	Suggested Changes: None.	Officer Comments: Section 4.2 of the 2022 SA Second Addendum report assesses 8 spatial options. It is considered that these appropriately assess the alternative spatial options available in the District, including for the rural area.
Representation Reference: SA-REF013.2 Name: Harris Lamb on behalf of	Refers to: POLICY ST1 - Bassetlaw’s Spatial Strategy	Legal compliance and soundness: Plan is legally compliant and complies with	Comments: Do not object to the principles underpinning the amount of employment land proposed and agree that the level of housing that is sought to accommodate the economic growth sought is appropriate. Some reservations about the housing requirement and housing supply and how this has	Suggested changes: <ul style="list-style-type: none"> Extend the Plan Period by a year to cover the period 2020 – 2039 Add a further 582 dwellings to the 	Officer comments: The Plan period runs until 2038; it is anticipated that the Local Plan will be adopted in 2023, so will have a life of 15 years from adoption, consistent with national policy. Assumed

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Muller Property Group		the Duty to Cooperate. Plan is unsound.	been derived. Maintain our previous objections about the choice of housing allocations, specifically in Retford. However, due to the delays in the Plan making process and the fact that the Council are currently consulting on a Second Addendum it is debatable whether the Plan Period will run for 15 years from the date of adoption. Contend that the Plan Period should be extended by a further year to run to 2039 to ensure that the Plan's strategic policies run for 15 years from the date of adoption. This would necessitate an additional 582 dwellings be added to the housing requirement. Figure 7 does not include any allowance for non-implementation of sites with planning permission. A typical non-implementation allowance that is generally applied is 10%. The windfall allowance for small sites in the trajectory states that 156 and 124 dwellings were completed in years 2020/21 and 21/22 and then 148 dwellings per year in each of the next 5 years are expected. This exceeds the historic average delivery on small sites and is in excess of the allowance that is included from 2026/27 onwards. The small sites windfalls should only run from 2022/23 – 2025/26 and be included at 100 dwellings per annum, whilst the 148 included for 2026/27 should be deleted due to duplication. This would reduce the supply by 388 dwellings. State that the inclusion of the windfall allowance will increase the size of the buffer to 17% which will help with additional housing supply through the Plan Period and provide flexibility should unforeseen circumstances delay bringing sites forward. If wish to guard against speculative development then would urge them to over allocate sites instead.	housing requirement meaning a minimum of 11,058 dwellings to be delivered <ul style="list-style-type: none"> • Reduce the supply from small sites with planning permission in the trajectory by 388 dwellings • Find alternative sites and allocations to make up for the loss of 388 dwellings in the supply, the additional 582 dwellings needed for the additional year of the Plan Period, and to propose allocations instead of the windfall allowance of 1,200 units (either in full or in part) • Consider the land at Bigsby Road, Retford, as a potential allocation to address these shortfalls/additional allocation 	delivery on small sites: as at 31 March there were 740 dwellings with outstanding planning permissions on small sites of 9 or less dwellings. Small sites normally get delivered within 5 years. It is considered reasonable that on average about 148 will be delivered each year from 2022/23 – 2026/27, and that there will be 100 additional dwellings delivered as windfalls in year 26/27. The Housing Supply, Trajectory and Windfall Allowance Background Paper May 2022 clarifies the windfall approach. There is not a requirement to include a lapsed sites discount rate. It is therefore not considered necessary to allocate additional sites.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Representation Reference: SA-REF014.1 Name: Marrons Planning on behalf of Vistry Group	Refers to: POLICY ST1 - Bassetlaw's Spatial Strategy	Legal compliance and soundness: Legal compliance and compliance with the Duty to Cooperate not specified. Plan is unsound.	Comments: Whilst the overall uplift to the LHN in support of economic growth is supported, a further uplift should be applied to reflect a significant shortfall in affordable housing and need of 214 homes per annum, consistent with national policy and guidance.	Suggested changes: Increase the housing requirement to help address identified affordable housing needs.	Officer comments: The Local Plan provides for affordable housing; 25% of homes on greenfield sites, and 15% on brownfield sites will be for affordable housing. The standard Method used to calculate housing need applies an affordability adjustment. It is considered that the higher housing requirement will appropriately contribute to meeting the identified affordable housing need.
Representation Reference: SA-REF014.2 Name: Marrons Planning on behalf of Vistry Group	Refers to: POLICY ST1 - Bassetlaw's Spatial Strategy - Windfall	Legal compliance and soundness: Legal compliance and compliance with the Duty to Cooperate not specified. Plan is unsound.	Comments: A reliance on windfalls of 100dpa is unnecessary and will constrain the ability to meet affordable housing needs. There are sustainable and deliverable sites for allocation which will be capable of delivering up to 25% on-site (e.g. Site LAA071). Against an identified need for 214 affordable homes per annum (identified in the HEDNA), the total planned requirement of 582dpa is unlikely to respond to the need for affordable homes. The issue is compounded by a reliance on windfalls and a limited number of new allocations.	Suggested changes: Remove/reduce windfall allowance and replace with deliverable and sustainable site allocations capable of addressing affordable housing needs (e.g. 25% on-site for greenfield allocations).	Officer comments: The Housing Supply, Trajectory and Windfall Allowance Background Paper May 2022 clarifies the windfall approach. Based on the historic evidence it is justified and accords with paragraph 71 of the NPPF.
Representation Reference: SA-REF014.3 Name: Marrons Planning on	Refers to: POLICY ST1 - Bassetlaw's Spatial Strategy	Legal compliance and soundness: Legal compliance and compliance with the Duty to	Comments: Directing 33% of Bassetlaw's growth to rural areas, with just 22% to the second largest settlement of Retford – a settlement at the top of the hierarchy with rail access on the East Coast Mainline - conflicts with the need to deliver sustainable patterns of development.	Suggested changes: Increase Retford's share of the housing requirement given its spatial role and ability to deliver further sustainable and deliverable allocations.	Officer comments: It is considered Retford will contribute an appropriate amount of the housing growth to meet the district need in accordance with its role and status in the settlement

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
behalf of Vistry Group		Cooperate not specified. Plan is unsound.			hierarchy. No additional sites are considered necessary.
Representation Reference: SA-REF014.5 Name: Marrons Planning on behalf of Vistry Group	Refers to: POLICY ST1 - Bassetlaw's Spatial Strategy	Legal compliance and soundness: Legal compliance and compliance with the Duty to Cooperate not specified. Plan is unsound.	Comments: The SA and Site Selection Paper are out-of-date and inconsistent with the up-to-date Land Availability Assessment (LAA, May 2022). Site LAA071 was rejected based on reasons now clearly resolved. The adverse impacts of the rural growth distribution proposed under Policy ST2 are clearly recognised as negatives in the SA given increased reliance on the car and related consequences in terms of climate change and CO2 emissions and air. The BLP Addendum does not propose to make any new allocations in response to the removal of the Garden Village proposal. Adding to the existing proposed allocations would bolster the housing land supply. The SA identifies potential issues associated with higher levels of growth at Retford. With respect to transport (SA6), flood risk (SA9), cultural heritage (SA13) and townscape (SA14) – none of these issues are overriding constraints on Site LAA071 Tiln Lane. Nevertheless, similar issues are raised for Retford sites LAA485, LAA490. The LAA conclusions regarding traffic congestion and construction traffic are applied inconsistently given that both issues are raised in the SA for growth options where allocations are proposed. With respect to impacts on townscape and heritage the SA is out-of-date given that the Council has already accepted that it should be possible to allocate additional growth at Retford without harm to landscape and townscape, subject to developing a landscape-led masterplans. The SA	Suggested changes: Allocate LAA071 for approximately 120 homes, supporting green spaces and infrastructure as a logical 'Phase 2' to the adjoining Linden Homes scheme which is already under construction	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. There is a 17% buffer in the supply as a contingency against non-delivery. No additional sites are considered necessary. There is no evidence to indicate that traffic congestion would not apply to this site or that a bus service can be secured.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			conclusions for LAA071 are incorrect where it states that the site is more than 400m from a bus stop. This is important since it appears to be one of the determining factors behind the site being discounted for allocation. The site is deliverable, available and achievable, in single ownership, forming a Phase 2 to development that is under construction.		
Representation Reference: SA-REF014.6 Name: Marrons Planning on behalf of Vistry Group	Refers to: POLICY ST1 - Bassetlaw's Spatial Strategy - Windfall	Legal compliance and soundness: Legal compliance and compliance with the Duty to Cooperate not specified. Plan is unsound.	Comments: Windfalls are smaller sites that are unlikely to sustain or support affordable housing delivery in the context of the needs identified. The allocation of specific greenfield allocations can contribute 25% affordable provision onsite. A reliance on windfalls may hinder economic objectives – e.g. a pressure to redevelop existing small-scale employment sites which could otherwise have been resisted through making sufficient deliverable site allocations.	Suggested changes: None.	Officer comments: 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, committed and proposed allocations will appropriately contribute to meeting affordable housing need. There is no evidence to suggest that the approach taken to windfalls will adversely affect economic objectives.
Representation Reference: SA-NRF021.1	Refers to: POLICY ST1: Bassetlaw's Spatial Strategy,	Legal compliance and soundness: Not specified	Comments: There is significant reliance placed on a small number of larger sites such as allocations HS1, HS7 and HS13, which account for approximately two thirds of the housing land to be allocated within the	Suggested changes: None	Officer comments: There is a 17% buffer in the housing supply, this is considered to provide sufficient flexibility. There is no evidence

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name: Gerald Eve on behalf of EDF D Page	POLICY ST3: Bassetlaw Garden Village Design and Development Principles, POLICY ST4: Bassetlaw Garden Village		draft local plan. Large sites can often experience delays in delivery for a multitude of reasons: Land ownerships; Technical constraints; Supply chain issues. The construction industry is going through an unprecedented period of cost inflation on materials and services as well as constrained supply chains and main- and sub-contractor. There is potential for a shortfall of housing completions to occur in the mid to latter part of the plan period. There appears to be scope and a need to add some additional certainty into Policy ST6 regarding the potential timing for delivery, subject to the technical and masterplanning matters first being resolved.		to indicate the technical and masterplanning issues have been resolved satisfactorily to enable timing of ST6 to be considered.
Representation Reference: SA-NRF023.2 Name: Savills on behalf of land owners S Williams	Refers to: Policy ST1: Spatial Strategy	Legal compliance and soundness: Not specified	Comments: No issue in principle to the overarching spatial strategy of Bassetlaw given it focuses on delivering sustainable development. It is important that rural settlements such as Elkesley are correctly labelled within the settlement hierarchy to allow managed growth in a positive way through allocating deliverable sites to meet their needs.	Suggested changes: None	Officer comments: The Local Plan distributes housing growth 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. The Spatial Strategy Background Paper sets out the qualifying criteria for a 'large and small rural settlement'. Elkesley is identified as a Small Rural Settlement as a result of the services and facilities available. Policy ST2 sets out the housing requirement for Elkesley; in 2020/21 four dwellings were delivered in Elkesley. There are 52 dwellings with planning

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
					permission. This is considered as being sufficient to provide for Elkesley's housing needs. There is no need to allocate additional sites.
Representation Reference: SA-REF018.1 Name: Spawforths on behalf of Albermarle Homes	Refers to: POLICY ST1 - Bassetlaw's Spatial Strategy	Legal compliance and soundness: Plan is not legally compliant, does not comply with the Duty to Cooperate and is unsound.	Comments: The evidence base which supports the plan appears incomplete and not up to date.	Suggested changes: <ul style="list-style-type: none"> • Update the evidence base to reflect national policy and guidance. • Review Spatial Strategy and assessment of sites. 	Officer comments: It is considered that the Local Plan evidence base is up to date, robust and aligns with national policy. 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: SA-REF018.2 Name: Spawforths on behalf of Albermarle Homes	Refers to: POLICY ST1 - Bassetlaw's Spatial Strategy	Legal compliance and soundness: Plan is not legally compliant, does not comply with the Duty to Cooperate and is unsound.	Comments: The provision for housing is insufficient based on the economic aspirations of the District and jobs growth. The Garden Village is removed, which includes 590 homes. Appropriate provision for new homes needs to be provided. It is concerning that a reduction in new homes is proposed within the Local Plan due to the removal of the Garden Village. Concerned that employment land has increased and no new housing has been identified for the housing/employment balance and the Garden Village has been removed. There are clear circumstances in Bassetlaw which demonstrate that housing need in Bassetlaw is higher than the figure that results from the	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 	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. The 2022 January Addendum extended the Local Plan period to 2038 in order to plan for 15 years from adoption, this is considered appropriate and in line with

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			'Standard methodology' and were explained in detail in the October 2021 representations.	potentially for 30 years to reflect the Garden Village proposals. <ul style="list-style-type: none"> • Include a higher buffer. • 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. • Allocate Blyth Road, Blyth/Harworth (LAA494) 	national policy. The 2022 May Second Addendum withdraws the Garden Village from the Local Plan. There is a 17% buffer in the housing land supply which is considered sufficient. 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 Blyth to meet the need. There is therefore no requirement to allocate additional sites.
Representation Reference: SA-REF018.3 Name: Spawforths on behalf of Albermarle Homes	Refers to: POLICY ST1 - Bassetlaw's Spatial Strategy – Economic Growth	Legal compliance and soundness: Plan is not legally compliant, does not comply with the Duty to Cooperate and is unsound.	Comments: Despite its preparation relatively recently in 2020, the HEDNA does not reflect the scale of ambition and substantial employment opportunities within the area. The HEDNA 2022 Addendum has sought to update the position but only focusses on employment supply and does not update the position on economic growth. The Local Plan evidence does not reflect fully on the impacts of Covid-19. The impact of Covid-19 and Brexit has not been restricted to logistics. The HEDNA, including the 2022 Addendum, adopts a pessimistic view on economic growth. Maintains its concern with the low jobs growth and constant commuting ratio assumptions within the Plan. The higher jobs growth	Suggested changes: Update the HEDNA	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 that the evidence is robust, takes into account the impacts of Covid and provides an up to date assessment of employment need. Recent

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			at the strategic employment site with a constant commuting ratio suggests a housing need of 646 dwellings per annum. 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. Previous delivery rates should therefore be considered when assessing future housing requirements.		housing delivery has been high due to the large number of permissions which have been granted over the past 5 years in the absence of an adopted local plan. The trajectory is based on market activity, information from developer partners and is considered to be an accurate position of delivery over the plan period.
Representation Reference: SA-REF018.4 Name: Spawforths on behalf of Albermarle Homes	Refers to: POLICY ST1 - Bassetlaw's Spatial Strategy – Housing Supply	Legal compliance and soundness: Plan is not legally compliant, does not comply with the Duty to Cooperate and is unsound.	Comments: Maintain its objections to anticipated delivery rates and whether the housing requirement is achievable in the Plan period. Has concerns with regards to the buffer, application of a lapse rate and the deliverability of some of the identified supply. The housing trajectory tables within the appendix to the Plan contain ambitious delivery rates on complex sites. Maintain its concern with the reliance of sites contained within 'made' Neighbourhood Plans, which have not been subject to the same rigour on deliverability as those within a Local Plan. These sites should be reassessed and other appropriate sites considered, such as Blyth Road. It will be policy compliant and deliver affordable housing. There are discrepancies between the figures for new allocations and the Worksop Central DPD. The windfall allowance does not fully reflect national policy. Would like to re-emphasise that the overall housing land supply should include a mix of short and long-term large, medium and small sites. Land at Blyth Road (LAA494) for circa 52 new homes is considered within that context. It is critical that an	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 potentially for 30 years to reflect the Garden Village proposals. • Include a higher buffer. • Review and provide evidence for the windfall allowance. 	Officer comments: Site delivery is based upon historic delivery rates in the district and information on build-out rates provided by developers and site promoters. There is 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. Approximately 90 of the dwellings originally proposed in the Worksop Central DPD have either been delivered or gained planning permission, so are included in the supply as completions or commitments. 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,

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			accurate assessment of availability, suitability, achievability, deliverability and viability is undertaken. It is also important that the Council's five year housing land supply is clear at the point of adoption. Concerned that the current statement still suggests an insufficient buffer in the supply of new housing.	<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 Blyth Road, Blyth/Harworth (LAA494) 	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, would ensure that sites less than 1 hectare contribute more than 10% towards meeting the housing requirement. The housing delivery test results for 2021 (January 2022) show that Bassetlaw's delivery was 248% against the target of the last 3 years, so a 5% buffer is appropriate.
Representation Reference: SA-REF018.5 Name: Spawforths on behalf of Albermarle Homes	Refers to: POLICY ST1 - Bassetlaw's Spatial Strategy – Distribution	Legal compliance and soundness: Plan is not legally compliant, does not comply with the Duty to Cooperate and is unsound.	Comments: Distribution The proportion of housing in Harworth & Bircotes continues to decrease. However, the Publication Plan Addendum shows only 16% of new housing is being located in the settlement. There are suitable sites on the edge of Harworth & Bircotes, which can sustainably accommodate further housing. Blyth Road, Blyth is on the edge of Harworth & Bircotes being opposite the new Symmetry Park (EM002) and adjacent to the large new employment site (EM007). The Council considered this site to be a remote rural location, which is inaccurate and incorrect. The Local Plan will need to substantially increase housing delivery and the choice and number of sites and potential outlets. Encourage the Council to review the existing commitments to ensure this is still deliverable. The site is supported by significant technical information which demonstrate that the	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 potentially for 30 years to reflect the Garden Village proposals. 	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 SA-REF018.4 above.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			site is available, suitable and achievable and therefore deliverable.	<ul style="list-style-type: none"> • Include a higher buffer. • 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. • Allocate Blyth Road, Blyth/Harworth (LAA494) 	
Representation Reference: SA-REF019.2 Name: Spawforths on behalf of Henry Boot Developments Ltd	Refers to: POLICY ST1: Spatial Strategy	Legal compliance and soundness: Plan is not legally compliant and is unsound. Compliance to the Duty to Cooperate not indicated.	Comments: Object that the proposed strategy does not take advantage of the importance of the A1 Corridor. Concerned about the removal of the Garden Village without a replacement. The A1 is a key corridor for growth as set out within the Bassetlaw A1 Logistics Assessment August 2021. The additional Strategic Employment site is welcomed but should be enhanced with further growth along the A1 corridor to reflect the evidence base and economic aspirations as set out within local and regional economic studies. Development along the strategic A1/A57 growth corridor can provide significant inward investment opportunities to address an identified regional or sub regional need for large scale logistics. 107.6 ha at Apleyhead is not sufficient to meet the strategic needs of the region and sub region given the importance of this part of the A1 corridor. There is significant potential for the levels	Suggested changes: <ul style="list-style-type: none"> • Increase the employment allocations to reflect the economic need and the economic growth aspirations for the District and region. • Identify further sites to increase flexibility in the Plan. • Allocate a Strategic Employment site at Gamston Airfield for logistics and distribution. 	Officer comments: It is considered that the Land Availability Assessment, Sustainability Appraisal and Site Selection Methodology provide an appropriate basis to assess sites and their suitability to address the district's employment need. No additional sites are needed. It is not accepted that the removal of the Garden Village means that there is no longer a focus for growth on the A1 corridor. Several site allocations sit along the corridor; comprising significant economic investment and job opportunities for Bassetlaw and the region. It is

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>of economic growth, to be exceeded and achieve above trend growth as a result of government investments in the region. Against this context of further investment in infrastructure and significant employment opportunities within Bassetlaw there is the evidence that strategic employment growth should be increased within the Plan. HEDNA prepared in 2020 reflects an out dated position on Covid-19 and the economic recovery considering for example it will take four years for jobs and employment to recover to pre-pandemic levels. The May 2022 HEDNA update does not consider the changes with regard to strategic need. Bassetlaw lies in a strategically important area in-between the Northern Powerhouse and the East Midlands. Vacancy rates are low at circa 2.98% and there is only 0.34 years supply of employment land. This all points towards the need for further employment land. The Local Plan will need to substantially increase employment delivery and the choice and number of sites. The strategic employment site at Gamston Airfield should be allocated within the plan and presents an opportunity to deliver regionally significant levels of good growth along the A1 corridor.</p>		<p>considered that the Plan provides an appropriate economic strategy to meet the district's needs as well as providing an appropriate contribution to the sub-region/regional economy. This has been recognised by the D2N2 LEP. It is acknowledged that the approach taken to the A1 could be better reflected in Objective 3; a proposed suggested change will address the matter: To support a step change in the local economy by promoting competitive, diverse and sustainable economic growth by providing the right conditions, land and premises in the District to accommodate general employment growth in sustainable locations accessible to the Main Towns and A1/A57 growth corridors, to cater for inward investment, and also; at a sub-regional/regional scale to contribute to meeting an identified need in the large-scale logistics sector along the A1, thereby helping to reduce out-commuting, create more better paid and higher skilled jobs and education and training opportunities to meet local</p>

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
					employment needs and aspirations
Representation Reference: SA-NRF020.1 Name: Spawforths on behalf of Network Space	Refers to: POLICY ST1: Spatial Strategy	Legal compliance and soundness: Plan is not legally compliant, is unsound and does not comply with the Duty to cooperate.	Comments Concerned that the level of employment land being provided does not reflect the evidence base. The April 2022 HEDNA Update shows the supply position at 189.4ha, which is below the HEDNA requirement of 196.7ha. The general employment land identified in the Plan is insufficient and will harm the local economy. Incorrect boundary has been identified and the entirety of Manton Wood Distribution Park should be included, which incorporates the extension land to the east. There is significant potential for the levels of economic growth, to be exceeded and achieve above trend growth. There is the evidence that employment growth should be increased within the Plan. The HEDNA prepared in 2020 reflects an out dated position on Covid-19 and the economic recovery and does not update the position on economic growth. HEDNA does not update employment analysis based on the current market for employment land. Bassetlaw lies in a strategically important area of the country in-between the Northern Powerhouse and the East Midlands, will benefit from growth in Yorkshire and the Midlands. The Sheffield Economic Plan vision aims by 2040 to create 33,000 extra people in higher level jobs and an extra £7.6bn growth in Gross Value Added in the economy. HEDNA adopts a pessimistic view on the economy. Vacancy rates are low in the area at circa 2.98% and there is only 0.34 years supply of employment land. This points towards the need for further employment land. The Local Plan will need to substantially increase employment	Suggested changes: <ul style="list-style-type: none"> • Increase the employment allocations to reflect the economic need and the economic growth aspirations for the District and region. • Identify further sites to increase flexibility in the Plan. • Allocate extension land at Manton Wood Distribution Park. 	Officer comments: It is considered that the HEDNA Addendum 2022 and the approach taken to Policy ST7, provides an updated position on Covid and economic recovery and is appropriate to meet general employment needs, with sufficient flexibility built in through a buffer, equivalent in employment terms of 10%, which is consistent with national policy. It is considered that the Land Availability Assessment, Sustainability Appraisal and Site Selection Methodology provide an appropriate basis to assess sites and their suitability to address the district's employment need. No additional sites are required. It is not considered the boundary on the Policies Map has been incorrectly drawn; the boundary for Manton Wood Distribution Park is accurate and reflects that which has planning permission.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			delivery and the choice and number of sites. Consider that extension land at Manton Wood Distribution Park be allocated in the Local Plan. The site is available, suitable and achievable and deliverable.		
Representation Reference: SA-REF017.1 Name: Heatons on behalf of William Davis Homes	Refers to: POLICY ST1 Housing Delivery and Supply	Legal compliance and soundness: Plan is not legally compliant and is unsound. Compliance with the Duty to Cooperate not specified.	Comments: The distribution of development for housing and employment needs, has evolved over time, and is detailed in the Spatial Strategy Background Paper, 2022, which is not within the scope of this consultation but is missing from the Local Plan evidence base.	Suggested changes: Include the Spatial Strategy Background Paper, 2022, in the Local Plan evidence base.	Officer comments: Noted.

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name:					
Representation Reference: 2127171.1 Name: Clarborough & Welham Parish Council	Refers to: POLICY ST2 - Rural Bassetlaw – Policy Point 1 and Paragraph 5.2.6 and	Legal compliance and soundness: Plan is legally compliant, sound and complies with the Duty to Cooperate.	Comments: Clarborough & Welham Parish Council support the continued inclusion policy of the 5% growth cap in the addendum for the 2022-2038 local plan.	Suggested changes: None.	Officer comments: Noted.
Representation Reference: SA-NRF005.1 Name: GPS Planning on behalf of Brooke Planning Consultancy Ltd	Refers to: POLICY ST2 - Rural Bassetlaw Point 1	Legal compliance and soundness: Plan is unsound. Legal compliance and compliance with Duty to Cooperate not indicated.	Comments: Consider the Local Plan to be unsound. Policy ST1 sets out that provision of housing land for a minimum of 10,476 dwellings to be made in the Local Plan with the supported delivery of 1,535 dwellings being provided in the Large Rural Settlements (LRSs) contributing towards this overall figure. Policy ST2 then goes on to say that with a 20% residential Growth Requirement as a number of dwellings this translates to the following at the LRSs: refers to Table extract from page 30. Cumulatively the Growth Requirement set out in ST2 equates to 1,297 dwellings across all the LRSs which is 238 dwellings short of the minimum number of 1,535 dwellings to be provided in the LRSs as stipulated in ST1. If the Growth Requirement was increased to say 23.5% (as demonstrated below) then the delivered number of dwellings at the LRSs would be closer to the minimum number of 1,535 dwellings to be provided	Suggested changes: <ul style="list-style-type: none"> • a greater minimum quantum of new housing is required at Misterton over and above the maximum numbers stipulated, • further land needs to be allocated for housing to meet the expected minimum housing delivery rates envisaged by the Plan at 	Officer comments: Policy ST2 sets out a housing requirement for designated neighbourhood areas which reflects the spatial strategy and settlement hierarchy. Overall the provision for the LRS has more than exceeded the required 20% growth total because of the large number of housing permissions granted. The 1,535 dwellings are committed dwellings except for the Tuxford allocation.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>as stipulated under ST1. 23.5% Growth Requirement as number of dwellings: 130; 605; 266; 227; 293; 1521 total. Why has Policy ST2 not been revised in the Second Addendum to achieve the minimum quantum of development envisaged in ST1. Has land interests at Misterton, one of the identified most sustainable Large Rural Settlements. Under Policy ST2 the suggested 20% growth requirement at Misterton equates to 194 dwellings. It is understood that the majority of these required dwellings are expected to be delivered by new allocations in the Local Plan or Neighbourhood Plans.</p>	<p>Misterton. As the development boundary has been so tightly drawn, further land on the edge of the settlement needs to be allocated.</p> <ul style="list-style-type: none"> • Land fronting Grovewood Road between the Primary school and Gravelholes Lane represents a logical parcel of land for allocation. • Question why the Growth Requirement for the LRCs has not been amended. 	

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name:					
Representation Reference: SA-REF004.5 Name: Pegasus Group on behalf of Barratt Homes	Refers to: POLICY ST2 - Rural Bassetlaw – Supporting text 5.1.53	Legal compliance and soundness: Plan is legally compliant and complies with the Duty to Cooperate. Plan is unsound.	Comments: Should be read alongside report which accompanies these submissions paragraphs 2.30 to 2.35. The Local Plan paragraph 5.1.53 identifies that the Large Rural Settlements of Blyth, Carlton in Lindrick and Costhorpe, Langold/Hodsock, Misterton and Tuxford are the most sustainable and act as service centres for the surrounding rural area. Despite the deletion of 590 dwellings at the Garden Village none of these settlements are identified to deliver further growth over and above existing commitments and the allocation at Tuxford. Figure 8, as amended, identifies that all of the additional growth required to meet the removal of the Garden Village appears to have been located in Harworth and Bircoates. Given the important role that Large Rural Settlements play within Bassetlaw this is considered unjustified. Policy ST2 (parts 2 and 3) effectively place a moratorium on development if cumulatively the 20% growth figure is met or surpassed through allocations and commitments. The only exception is where a proposal: "...has the support of the community through the preparation of a neighbourhood plan (including a review), or in the absence of a Neighbourhood Plan, through a developer-led pre-application community consultation..." The Langold Neighbourhood Plan was made on 6th May 2021. This plan identifies the current commitments within the settlement which	Suggested changes: <ul style="list-style-type: none"> Given the withdrawal of the Garden Village additional allocations should be identified in Large Rural Settlements such as Langold. Land parcels B and C, as identified in figure 1 are an opportunity for a sustainable extension Langold later in the plan period. Delivery could be combined with a new landscaped defensible boundary and an existing mature hedgerow to the west. Access could potentially be via the A60. 	Officer comments: 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 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. There is a 17% buffer in the supply in case of non-delivery. This provides sufficient flexibility. The housing commitment referred to is allocated by the Langold Neighbourhood Plan which forms part of the development plan for the district. It is considered the allocation provides a sufficient supportive framework to enable the delivery of the planning permission in line with the

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			are identified to deliver its requisite growth over the neighbourhood plan period 2020 to 2037. Whilst the Neighbourhood Plan is an important consideration it should not be used as a reason for a moratorium upon future development within the settlement. In addition, the 20% figure is an arbitrary figure which pays no regard to opportunities or constraints. Such an approach is considered contrary to the ethos of the NPPF.		communities ambitions for Langold identified through the neighbourhood plan. Langold is accommodating growth additional to their requirement through planning permissions or through NP allocations. Therefore, there is no need for additional sites in Langold.
Representation Reference: 2133450.1 Name: Residents	Refers to: POLICY ST2 - Rural Bassetlaw – Policy Point 3	Legal compliance and soundness: Plan is legally compliant and complies with the Duty to Cooperate. Plan is unsound.	Comments: Welcome the Second Addendum in particular, the changes to Paragraph 3 of Policy ST2 now ensure that, where a settlement has a Neighbourhood Plan, as Lound does, any additional residential development above the growth requirement would require the support of the community through a review of the Neighbourhood Plan. This reinforces the importance of the local community and its Neighbourhood Plan in implementing Localism and is very much in line with Lound’s wishes and comments on the original Publication. Only in the absence of a Neighbourhood Plan would a developer-led pre-application community consultation come into play. Paragraph 3 starts with a very long sentence; to make it clearer, it is suggested that this should be split into two sub-paragraphs, as below, for settlements with and without Neighbourhood Plans. It is not understood why the points from the “Statement of Community	Suggested changes: Proposed that Paragraph 3 be split into two sub-paragraphs, as below, for settlements with and without Neighbourhood Plans. comments about the Statement of Community Involvement and Rural Settlement Implementation Guide, together with the detailed bullet points, are relevant to any	Officer comments: The reference to the Statement of Community Involvement relate specifically to the requirement for developers to consult appropriately outside of the neighbourhood plan process. It is acknowledged that to enhance legibility the introduction to Policy ST2 Part 3 would benefit from a re-structure; it is considered a proposed suggested change addresses the matter: Where the growth requirement for an eligible Large or Small Rural Settlement has been achieved, additional residential development will only be supported in those eligible

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			Involvement and Rural Settlement Implementation Guide” are shown in this section on additional residential development. Should these not apply more generally to all development?	residential development, not just additional residential development above the growth requirement, and as such they may belong elsewhere. Paragraph 3 should read as: "3(i) Where the growth requirement for an eligible Large or Small Rural Settlement has been achieved, additional residential development will only be supported in those eligible settlements where it can be demonstrated that it has the support of the community through the preparation of a	settlements where it can be demonstrated that: a) it has the support of the community through the preparation of a made neighbourhood plan (including a review); or b) in the absence of a Neighbourhood Plan, or where a made Neighbourhood Plan is more than five years old (from the date it was made by the Council) through a developer-led pre-application community consultation, in accordance with the Statement of Community Involvement and Rural Settlement Implementation Guide, where it is proposing:

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
				Neighbourhood Plan (including a review). "3(ii) In the absence of a Neighbourhood Plan, a developer-led pre-application community consultation should be undertaken."	
Representation Reference: 2133459.1 Name: Lound Neighbourhood Plan Steering Group	Refers to: POLICY ST2 - Rural Bassetlaw – Policy Point 3	Legal compliance and soundness: Plan is legally compliant and complies with the Duty to Cooperate. Plan is unsound.	Comments: Welcome the Second Addendum in particular, the changes to Paragraph 3 of Policy ST2 now ensure that, where a settlement has a Neighbourhood Plan, as Lound does, any additional residential development above the growth requirement would require the support of the community through a review of the Neighbourhood Plan. This reinforces the importance of the local community and its Neighbourhood Plan in implementing Localism and is very much in line with Lound's wishes and also with our comments on the Publication Version. Only in the absence of a Neighbourhood Plan would a developer-led pre-application community consultation come into play. Paragraph 3 starts with a very long sentence; to make it clearer, it is suggested that this should be split into two sub-paragraphs, as below, for settlements with and without Neighbourhood Plans. It is not understood	Suggested changes: Proposed that Paragraph 3 be split into two sub-paragraphs, as below, for settlements with and without Neighbourhood Plans. comments about the Statement of Community Involvement and Rural Settlement Implementation Guide, together with the detailed bullet points, are	Officer comments: The reference to the Statement of Community Involvement relate specifically to the requirement for developers to consult appropriately outside of the neighbourhood plan process. It is acknowledged that to enhance legibility the introduction to Policy ST2 Part 3 would benefit from a re-structure; it is considered a proposed suggested change addresses the matter: Where the growth requirement for an eligible Large or Small Rural Settlement has been achieved, additional residential development will only be

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>why the points from the “Statement of Community Involvement and Rural Settlement Implementation Guide” are shown in this section on additional residential development. Should these not apply more generally to all development?</p>	<p>relevant to any residential development, not just additional residential development above the growth requirement, and as such they may belong elsewhere. Paragraph 3 should read as: "3(i) Where the growth requirement for an eligible Large or Small Rural Settlement has been achieved, additional residential development will only be supported in those eligible settlements where it can be demonstrated that it has the support of the community through the</p>	<p>supported in those eligible settlements where it can be demonstrated that: a) it has the support of the community through the preparation of a made neighbourhood plan (including a review); or b) in the absence of a Neighbourhood Plan, or where a made Neighbourhood Plan is more than five years old (from the date it was made by the Council) through a developer-led pre-application community consultation, in accordance with the Statement of Community Involvement and Rural Settlement Implementation Guide, where it is proposing:</p>

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
				preparation of a Neighbourhood Plan (including a review). "3(ii) In the absence of a Neighbourhood Plan, a developer-led pre-application community consultation should be undertaken."	
Representation Reference: 2134588.1 Name: Lound Parish Council	Refers to: POLICY ST2 - Rural Bassetlaw – Policy Point 3	Legal compliance and soundness: Plan is legally compliant and complies with the Duty to Cooperate. Plan is unsound.	Comments: Welcome the Second Addendum in particular, the changes to Paragraph 3 of Policy ST2 now ensure that, where a settlement has a Neighbourhood Plan, as Lound does, any additional residential development above the growth requirement would require the support of the community through a review of the Neighbourhood Plan. This reinforces the importance of the local community and its Neighbourhood Plan in implementing Localism and is very much in line with Lound's wishes and also with our comments on the Publication Version. Only in the absence of a Neighbourhood Plan would a developer-led pre-application community consultation come into play. Paragraph 3 starts with a very long sentence and, to make it clearer, it is suggested that this should be split into two sub-paragraphs, as below, for settlements with and	Suggested changes: Proposed that Paragraph 3 be split into two sub-paragraphs, as below, for settlements with and without Neighbourhood Plans. comments about the Statement of Community Involvement and Rural Settlement Implementation Guide, together with the detailed	Officer comments: The reference to the Statement of Community Involvement relate specifically to the requirement for developers to consult appropriately outside of the neighbourhood plan process. It is acknowledged that to enhance legibility the introduction to Policy ST2 Part 3 would benefit from a re-structure; it is considered a proposed suggested change addresses the matter: Where the growth requirement for an eligible Large or Small Rural Settlement has been achieved, additional residential

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			without Neighbourhood Plans. It is not understood why the points from the "Statement of Community Involvement and Rural Settlement Implementation Guide" are shown in this section on additional residential development. Should these not apply more generally to all development?	bullet points, are relevant to any residential development, not just additional residential development above the growth requirement, and as such they may belong elsewhere. Paragraph 3 should read as: "3(i) Where the growth requirement for an eligible Large or Small Rural Settlement has been achieved, additional residential development will only be supported in those eligible settlements where it can be demonstrated that it has the support of the community	development will only be supported in those eligible settlements where it can be demonstrated that: a) it has the support of the community through the preparation of a made neighbourhood plan (including a review); or b) in the absence of a Neighbourhood Plan, or where a made Neighbourhood Plan is more than five years old (from the date it was made by the Council) through a developer-led pre-application community consultation, in accordance with the Statement of Community Involvement and Rural Settlement Implementation Guide, where it is proposing:

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
				through the preparation of a Neighbourhood Plan (including a review). "3(ii) In the absence of a Neighbourhood Plan, a developer-led pre-application community consultation should be undertaken."	
Representation Reference: SA-REF008.2 Name: Barton Willmore on behalf of Heyford Developments Ltd	Refers to: POLICY ST2 - Rural Bassetlaw	Legal compliance and soundness: Plan is legally compliant and complies with the Duty to Cooperate. Plan is unsound.	Comments: Consider that comments to the previous Plan Regulation 19 are still relevant in the context of the omission of site, and comments and objection to Policy ST1. The Bassetlaw Rural Settlement Study Update (November 2020) acknowledges at page 4 that an out-of-date Plan in the past has: "contributed to the inconsistent management of rural growth across Bassetlaw. Some settlements have grown by hundreds of houses and others have had none, contributing to a growing conflict between the balance of sustainable growth and the benefits that generally accompany new development. In Bassetlaw, these conflicts are translated – most apparently - into a lack of infrastructure being delivered to support a growing population and a large oversupply of residential	Suggested changes: <ul style="list-style-type: none"> The Policy should set out what the breakdown is in terms of commitments (including reductions for lapse rates) and new housing, with a focus on clarifying whether Neighbourhood Plan allocations have been double counted 	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

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>planning permissions (or commitments) in areas – particularly those that, perhaps, do not have an adequate level of services and facilities to support such a high level of growth”. Note that the Council do not consider a blanket growth requirement for all the Rural Settlements to be appropriate, as set out in paragraph 5.2.7 in the Publication Plan. This is suggested by differentiating between Large and Small Rural Settlements. Support splitting the settlements and the methodology behind it, there is a blanket growth approach for both Large and Small Rural Settlements. Blyth is one of the Large Rural Settlements determined to be eligible to grow by 20% in the plan period, along with several others, in addition to several eligible Small Rural Settlements. There is no distinction between the level of services, facilities, and amenities between the settlements; the blanket growth requirement will perpetuate this imbalance and unsustainable growth that has been created in a policy vacuum. Instead, further growth should be directed to sustainable settlements, such as Blyth, which has a higher capacity for growth than the arbitrary 20% cap allows. The policy raises concerns over its consistency with the NPPF’s objective to significantly boost the supply of homes (paragraph 60). Growth in Rural Settlements is largely dependent on commitments, but the draft Plan is unclear as to what will be delivered. There is an inconsistency between Figure 8 (suggesting total</p>	<p>in the commitments.</p> <ul style="list-style-type: none"> • Should address the imbalance between the significantly higher quantum of development that the Small Rural Settlements are set to accommodate compared to the Large Rural Settlements. This can be rebalanced if there is a shortfall due to double counting. • Should revisit the 20% growth requirement/cap applied to Large Rural Settlements and should account for lapse rates. 	<p>upon ability 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 a 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% buffer in the supply in case of non-delivery. This provides</p>

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>growth of 1,535 dwellings in Large Rural Settlements) and the commitments in the Land Availability Assessment (suggesting 1,296 dwellings, when taking into account the proposed allocation in Tuxford). It appears that the Neighbourhood Plan allocations have been double counted. Query whether the same has been done for Small Rural Settlements. This needs to be addressed, otherwise there is a potential shortfall, which is not clear as the draft Plan is unclear as to what will be delivered. The revised housing distribution at Policy ST1 appears to suggest an increase over and above the January 2021 consultation of 94 dwellings in the Large Rural Settlements and 231 dwellings in Small Rural Settlements. It is difficult to understand why given the findings of the Bassetlaw Rural Settlement Study Update and Spatial Strategy Background Paper (Update November 2020), which clearly set out the distinction between Small and Large Rural Settlements and their comparative capacity for growth. If there is an issue with double counting Neighbourhood Plan commitments, then the shortfall should be directed towards Blyth. Part 3 of Policy ST2 sets out the principles for which additional residential development will be supported above the 20% growth requirement. The only mechanism appears to be a community-led approach via the neighbourhood plan process. Strongly object to Part 3 as it will limit growth in</p>	<p>Additional growth should be directed to more sustainable settlements such as Blyth. This should consider the relationship between employment and housing growth as in our response to Policy ST1.</p> <ul style="list-style-type: none"> • The policy should remove reference to the weight to be afforded to local community support in determining applications as this could undermine the assessment of an application on its merits. This should be 	<p>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.</p>

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>sustainable locations given the strict adherence to a cap. Whilst the opinions of the local community are important to consider, there are a wider range of material considerations that should also be appropriately assessed. It is considered that this element should be removed and replaced with a more specific set of criteria to which applications should be assessed. This is particularly important given the points raised above in relation to Policy ST1 and the potential for Neighbourhood Plans to allocate sites which may not be ultimately deliverable or developable in the Plan period. If there is no requirement or mechanism to require a review of a Neighbourhood Plan, then there is no means of approving alternative housing under Policy ST2 Part 3. To assist with this, Policy ST2 should include a reference to the need for ongoing monitoring of delivery and supply within the Rural Settlements. It should make provisions for instances where Neighbourhood Plan allocations (or permissioned sites) are not being implemented, and the 20% growth not being achieved (LAA states a historic lapse rate of 24% for such sites). The policy should state that in these circumstances a review of those allocations will be necessary and additional supply will be brought forward ahead of such reviews via a reasonable criteria-based policy, so as to ensure an ongoing supply of housing (in accordance with NPPF paragraphs 74-77) The</p>	<p>replaced with a more appropriate set of criteria.</p> <ul style="list-style-type: none"> • The policy should incorporate an ongoing monitoring of delivery and supply within the Rural Settlements, with a policy basis to support additional supply in the event Neighbourhood Plan allocations and other commitments are not being delivered. 	

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			criteria-based policy could reflect that of the current Core Strategy (2011) Policy CS1 and approach in relation to developments outside of the settlement boundaries (Authority Monitoring Report 2020/21 in relation to Indicator H5: Number of houses built and permitted outside the settlement boundaries). Policy ST2 is not justified as the evidence supporting it is not clear how the housing requirement will be delivered, meaning it is not positively prepared or effective. As insufficient growth is directed to Blyth, the Plan will not deliver balanced growth spread across the more sustainable rural settlements and so this will not be consistent with the NPPF and its aims to deliver sustainable development.		
Representation Reference: SA-NRF015.3 Name: Resident	Refers to: POLICY ST2 - Rural Bassetlaw	Legal compliance and soundness: Legal compliance, Soundness and Compliance with the Duty to Cooperate not specified	Comments: ST2 does not deliver against 5.2.1 of the BELP/SO5 or the NPPF because the proposed housing allocations to current Rural Service Centres are too small. They are practically meaningless – you need housing allocations to deliver NEW services. ST2 is unjustified, inconsistent with National Policy and cannot claim to be delivering rural VITALITY at 5.2.1. Between Bawtry and Gainsborough, the A631 flows unhindered for 12 miles bar various speed limits and a single roundabout at Beckingham. It is suggested here that 1 x set of traffic lights (of the variety to assist the equine fraternity) at the point of the current pedestrian crossing in Everton, would	Suggested Changes: None	Officer Comments: The Local Plan distributes housing growth 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. The Spatial Strategy Background Paper sets out the qualifying criteria for a ‘large and small rural settlement’. The rural area is making a significant

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>not be of detriment to traffic flow along the 12-mile stretch. Rather, it would help the awkward A631 cross roads from Mattersey and the acute A631 turning into Chapel Lane. Previous responses have not been collated by the Council. Our experience of Neighbourhood Planning (NP) was laid out in detail and it is disturbing to read that the LPA deems itself to possess a “strong tradition of Neighbourhood Planning” at 5.2.11 when less than 10% of NPs nationally were called for a public hearing – unlike in Everton. 5.1.60 states that development will be allowed within settlement boundaries yet the development boundary for Everton is entirely incorrect with FOUR planning approvals totalling over 3acres and stretching the settlement boundary in a westerly direction, ignored: a. Farm Shop and Café – IMPLEMENTED b. Farm Shed and Sui Generis diversification – IMPLEMENTED c. 20/00819/COND – IMPLEMENTED (nor shown in the housing trajectory) d. 21/00042/COND – IMPLEMENTED (nor shown in the housing trajectory). This is despite responding to all statutory NP consultations and filing a formal complaint reference the above omissions. The omissions mean that the character map for this part of Everton is incorrect in the made NP and have had TWO refusals resulting from this misrepresentation of the village grain. Have just submitted to Appeal and incurred significant cost as a result. 5.2.9 states that rural growth will be</p>		<p>contribution towards meeting the overall housing need in the District. The proposed 20% or 5% is a requirement but additional growth may be supported where appropriate through Policy ST2, national planning policy or via neighbourhood plans. Policy ST2 does not require the growth to be delivered by site allocations within neighbourhood plans. Neighbourhood plans are also not required to contain site allocations. In these circumstances, Policy ST2 with other relevant Local Plan policies will apply alongside relevant neighbourhood plan policies. Everton has a made neighbourhood plan. It is not a requirement for neighbourhood plans to go to examination. Para 5.1.60 refers to development boundaries in the emerging Local Plan. These will not have weight until the Local Plan is adopted, so are</p>

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>delivered by Neighbourhood Plan allocations – yet Everton NP does not have any allocations. The Examiner required that a windfall policy be implemented instead. ST2 Table shows that of 34 “small” settlements allowed to grow to a 5% cap, only one will have the ability to build 2 houses per annum to 2038. Most, like Everton, won’t even get to build ONE/pa – yet 5.2.10 will require site promoters to negotiate with the community in order to get more. This is not justified; it will not be effective and it is not consistent with National Policy. 5.2.12 will not work. Our 2016 application provided a large cemetery extension, a cemetery car park, affordable housing contributions, open space contributions, education contributions and a new bus stop – all via a signed s106 – and the community objected. The Examiner to the Neighbourhood Plan scrubbed the need for Community support understanding that this key NP target would not be delivered otherwise. Cannot find the 2022 Rural Implementation Guide or the 2022 Rural Settlement Study Update but they are likely to contribute to a decimation of rural vitality and sustainability and growth. This clearly demonstrates that the LPA expects villages to stagnate and expect there to be a number of primary school closures in the rural district by 2038. The BELP has gifted all surplus housing numbers to higher tier settlements following the collapse of the</p>		<p>not being used to assess planning applications currently. The Rural Settlement Study was updated in August 2021 and is available on the Council’s website. The Rural Implementation Guide will be available following the adoption of the Local Plan. There is a 17% buffer in the housing supply, this is considered to provide sufficient flexibility following the withdrawal of the Garden Village. No additional sites are required.</p>

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			Garden Village proposal. This is despite said numbers having been taken from Rural Service Centres in the first place. The BELP is disproportionately focussed on Regeneration and SO4 thus subjecting the rural hinterland to undoubted stagnation. The vanishingly small amount of development proposed in the rural area is unacceptable and breaches both National Policy and the district's Strategic Objectives. The references to "the community" and community-led planning in the rural context, is cynical which will lead to ageing rural settlements and primary school closures. Policies ST1 and ST2 need to be rewritten in a non-cynical and balanced way – both numerically and in word.		
Representation Reference: SA-NRF015.4 Name: Resident	Refers to: POLICY ST2 - Rural Bassetlaw - Supporting text paragraph 5.2.1	Legal compliance and soundness: Not specified	Comments: OBJECTION – ST2 does not deliver against 5.2.1 of the BELP/SO5 or the NPPF because the proposed housing allocations to current Rural Service Centres are too small. They are practically meaningless – you need housing allocations to deliver NEW services. ST2 is unjustified, inconsistent with National Policy and cannot claim to be delivering rural VITALITY at 5.2.1. The council weights rural opinion exponentially higher than urban opinion in this and all preceding BELPs. Is this legal?	Suggested Changes: None	Officer Comments: The Local Plan distributes housing growth 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. The Spatial Strategy Background Paper sets out the qualifying criteria for a 'large and small rural settlement'. The rural area is making a significant

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
					contribution towards meeting the overall housing need in the District. The proposed 20% or 5% is a requirement but additional growth may be supported where appropriate through Policy ST2, national planning policy or via neighbourhood plans.
Representation Reference: SA-NRF015.6 Name: Resident	Refers to: POLICY ST2 - Rural Bassetlaw - Supporting Paragraphs 5.2.2 and 5.2.3	Legal compliance and soundness: Not specified	Comments: 5.2.2 and 5.2.3 of the BELP look down the telescope the wrong way. No-one is suggesting a vast housing estate without services. Want to deliver services on an A-road frontage location. And for these new services to benefit existing residents.	Suggested Changes: None	Officer Comments: Noted.
Representation Reference: SA-NRF023.3 Name: Savills on behalf of land owners S Williams	Refers to: Policy ST2: Rural Bassetlaw	Legal compliance and soundness: Not specified.	Comments: The NPPF is unequivocal in its support for growth in rural areas and states that 'Planning policies should identify opportunities for villages to grow and thrive' (paragraph 77) and supports the wider growth aspirations of the Local Plan. Growth in villages will ensure that an appropriate level of affordable housing can be delivered. High house prices in villages, driven by a lack of supply, often results in existing residents having to leave in order to secure more affordable homes elsewhere. The distribution of growth to these areas will contribute	Suggested Changes: <ul style="list-style-type: none"> • Elkesley to be recognised as a Large Rural settlement which affords 20% growth given the facilities and shops within the village • flexibility in Policy ST2 to 	Officer comments: The Local Plan distributes housing growth 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. The Spatial Strategy Background Paper sets out the qualifying criteria for a 'large and small

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>an appropriate mix and tenure of homes to meet local housing needs. It is important that the emerging Local Plan considers the market requirement in a post-covid world. The pandemic has resulted in a shift in working practices, with more people working from home and a reduction in commuting or travelling for work. In turn, there has been an increase in demand for homes in countryside or village locations. Savills UK Housing Market Update (June 2021) has demonstrated that the pandemic has resulted in a 'race for space' with a demand for homes in more rural locations. Whilst this needs to be balanced with existing housing needs, there is the opportunity through appropriate growth to provide a mix of homes to meet the varying needs and demand at a micro and macro scale. It is clear that there is a market for housing growth within villages, particularly those villages with key services as well as strong infrastructure links e.g. Elkesley. In order to maintain rural vitality question the categorisation of Elkesley as a smaller village rather than a large rural settlement and disappointed this still results in a housing requirement of 5% compared to the 20% which was mentioned in 2020. Advise against the use of a 'cap' figure as it is inconsistent with the NPPF. It is understood that the categorising the villages centres around the LPA's considered 'sustainability' of the these settlements to accommodate growth</p>	<p>include a sequential test to the location of development both within and adjacent to the settlement.</p>	<p>rural settlement'. Elkesley is identified as a Small Rural Settlement based on the level and mix of services provided. The rural area is making a significant contribution towards meeting the overall housing need in the District. The proposed 20% or 5% is a requirement but additional growth may be supported where appropriate through Policy ST2, national planning policy or via neighbourhood plans. The Rural Settlement Study was updated in August 2021 and is available on the Council's website.</p>

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>with the Rural Settlement Study note that there is reference to the Bassetlaw Rural Settlement Study Update 2022 which are unable to find. Referring to the Bassetlaw Rural Settlement Study (2020) page 10 that a Large Rural Settlement will: "Play a role as a 'service centre' for other settlements, have individually 500 or more dwellings and have all of the following; a primary school, doctors surgery/health centre, a community centre/hall, a convenience store, a church and a public house."</p> <p>Elkesley's role is as a local rural service centre for other settlements (such as Gamston/ Markham Moor/Rockley and West Drayton); The population of Elkesley, taking onboard the committed growth, would broadly be in line with the population of Blyth at c. 1,200 residents. Add that population size is a crude estimate as it is relative to its area and should not be relied upon as the sole reason for allocating a settlement; Elkesley is sustainable and benefits from a Primary and Nursery School, coffee shop, bakery, pop up post office and a takeaway/ restaurant; Elkesley village also benefits from direct access on to the A1, improved as part of the recently completed new Elkesley Bridge Road which provides additional capacity and access to both Retford and Worksop; The village also benefits from four bus services departing from High Street, while run as a rural service, provide routes to Doncaster and Retford; The village benefits from Elkesley Park</p>		

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>Industrial Estate which consists of warehousing and distribution uses for employment opportunities; and note that one of the eligible large rural settlements listed within draft Policy ST2 is Blyth. This is very comparable to that of Elkesley. It is recommended that Elkesley is upgraded to a large rural settlement given the village has a range of key facilities and shops and the opportunity for future facilities to generally meet the criteria (similar to that of Blyth). Not restricting housing has a fundamental role to play in the sustainability of villages, such as Elkesley. In doing so it will make a contribution in meeting the overall housing targets for the area and should be recognised as a key component to the overall growth strategy within the district and in encouraging sustainable development more generally in rural areas. Paragraph 77 of the NPPF and PPG (rural housing) are clear on this. It is important that rural settlements such as Elkesley are allowed to manage growth in a positive way through allocating deliverable sites to meet the needs and help sustain the critical mass and ensure facilities and services continue to thrive and expand as it has positively done so through the Neighbourhood Plan and will seek to do so again. Flexibility should be included within policies relating to growth in villages, this includes allowing growth within and also adjacent to the settlement boundaries. This mechanism is in</p>		

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>conjunction with other local authorities such as Central Lincolnshire, Policy SP4, which includes a sequential approach with priority given to brownfield sites but which does allow sensitive development on the edge of settlements. The site, south of Coalpit Lane could help to alleviate the housing pressures and concentration of older generations and provide 'starter homes' to help affordability and home ownership within the village whilst also safeguarding the social infrastructure of the village. The landowners are keen on maximising benefits back to the village and opportunities for other onsite facilities in agreement with the residents and Parish Council such as amenity greenspace. It is clear that the village should not be restricted should they decide this is a suitable option for growth and as such the 5% 'cap' should be regarded as a minimum figure and not a maximum in accordance with paragraph 77 of the NPPF. Remove 'cap' in favour of 'minimum' percent and flexibility in Policy ST2 to include a sequential test to the location of development both within and adjacent to the settlement, in the interests of positive and compliant plan making.</p>		

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name:					
Representation Reference: REF021.1 Name: Babworth Parish Council	Refers to: Policy ST2: Rural Bassetlaw	Legal compliance and soundness: Not Specified	Comments: Bassetlaw Council have tried to reassure Babworth Parish Council that there is flexibility in the location of the allocation of housing for the future Bassetlaw Local Plan within the Parish of Babworth. Still feel that how the suggested allocation is distributed and location described is incorrect and could be open to a different interpretation, which would not benefit the Parish. Throughout the Local Plan process Babworth Parish has held a unique position. It is a very large geographical, rural parish which is sparsely populated. When the Garden Village was proposed, this was going to be situated within Babworth Parish which would have completely changed the demographic, character and makeup of the Parish. Now the Garden Village has been scrapped, Babworth Parish council think that the housing requirement (as described in the Local Plan) is unfair, disproportionate, misrepresentative and incorrect. Babworth Parish has approximately 260 dwellings, only 89 are located within Ranby Village (34% of the total for the Parish). If the next 3 largest clusters of dwellings are added together which are in close proximity to each other, this totals 79 dwellings, almost as big as Ranby Village. However, ALL of the housing requirement for the WHOLE of the Parish for the next planning period has been allocated to Ranby Village - this cannot be correct. All of the other small rural settlements within the	Suggested Changes: None	Officer Comments: The housing requirement for eligible settlements listed in Policy ST2 have been calculated using an existing baseline of the number of dwellings in each parish (as of 13th August 2018 - when the data was collected). The individual housing requirements have then been calculated as a percentage of this number. Those percentages are set at either 20% for Large Rural Settlements or 5% for Small Rural Settlements. Policy ST2 only identifies eligible settlements (within a parish area) that meet the qualifying criteria within the Spatial Strategy Background Paper for a 'large and small rural settlement'. If a settlement is not listed, then it does not meet the qualifying criteria, and the housing requirement is zero. The housing requirements are the baseline position considered

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>Local Plan have a single large village base which makes up the vast majority of their housing stock for that parish, certainly over 50% of the total of the parish and nowhere near as low as Ranby village's level of 34%. The eastern border of Babworth Parish is very close to Retford (within easy walking distance), which would provide more opportunities for work and services than within Ranby Village. Ranby Village is the settlement furthest away from Retford town centre, and also equidistant to Worksop town centre. The largest employer within Babworth parish is the Prison which is not located within Ranby village. The housing allocation for Babworth Parish must not be allocated solely to Ranby Village because it restricts opportunities across the rest of the parish which may be more sustainable and have much bigger benefits. It is depriving the other villages/settlements and the rest of the vast geographical areas of the Parish the opportunities to be developed. There are also several farming businesses within the Parish, for whom their businesses need staff to live within a very short distance/on site due to the hours they work. There would be no room for expansion. Given the number of listed buildings and monuments in Ranby village, compared to these other settlements, the approval of new housing in other areas of the Parish would also be less restricted.</p>		<p>appropriate to meet the needs of the rural communities. However, there is scope for the level or distribution of growth to be increased or justified differently – through the demonstration of community support - within a neighbourhood plan or a review of an existing neighbourhood plan. The Council considers the neighbourhood plan process the most appropriate mechanism to demonstrate community support and to justify a higher level or alternative distribution of growth within their designated area based on local circumstance.</p>

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>Babworth Parish is embarking on a neighbourhood plan which will identify these areas in more depth. Either the housing allocation calculation should be made using Ranby Village only, i.e. 5% of 89 dwellings = 4.5 dwellings required OR the description of the area needs changing to include the whole of Babworth Parish including Ranby and the other settlements. Otherwise, the rest of the houses/people in the parish have not been identified/included. It has been accepted that houses can be allocated within Babworth Parish, other than in Ranby Village as the proposed Garden Village was not within Ranby Village but was within Babworth Parish. There have also been new dwellings developed within Babworth parish, outside of Ranby village. The proposal is a misapplication of the common “rule” that is being applied to the other villages and whole parishes. 5% of 89 houses, is 4.5 houses. Adding another 13 houses onto only 89 to start with is 15% - 3 times the proportion of new houses in other villages. Additionally, given the small number of 89 houses in this hamlet/village to start with 13 more would make a massive impact to the village and change its lower density and rural character.</p>		

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name:					
Representation Reference: 2114187.1 Name: Resident	Refers to: POLICY ST3 and ST4: Bassetlaw Garden Village	Legal compliance and soundness: Legal compliance, Soundness and Compliance with the Duty to Cooperate not specified.	Comments: The construction of a new Garden Village is a vanity project. Cannot see why it is necessary to build a new linear Village on farmland where there are so many other villages with infrastructure which could be expanded. The location brings Worksop closer to Retford on pristine land that should be preserved as such. Live in an expanded village, East Markham, and see that many new houses have been built which in my mind have been done tastefully and add to the community. See other numerous villages with connectivity to the A1 that could be added to in the same way and probably keep pubs, schools and Village halls going. A new built Village is not necessary to assist housing needs.	Suggested changes: None.	Officer comments: The May 2022 Second Addendum withdraws the Garden Village from the Local Plan.
Representation Reference: SA-REF005.2 Name: Barton Willmore (Stantec) on behalf of (Howard) Retford Limited	Refers to: POLICY ST3 and ST4 - Bassetlaw Garden Village	Legal compliance and soundness: Plan is legally compliant and complies with the Duty to Cooperate. Plan is unsound.	Comments: It is understood that a landowner has withdrawn their site from the proposed Bassetlaw Garden Village. As a result, the Garden Village has been removed from the emerging Local Plan. The Garden Village was to accommodate 590 residential units by 2038 and 4,000 residential units in total, under Policy ST3. In previous representations questioned the deliverability of the Bassetlaw Garden Village. The proposed site would have been in a freestanding location without the benefit of existing infrastructure or links to existing settlements. The delivery of the Garden Village would have been uncertain without significant external funding. It was also considered that a new Garden Village is not necessary in Bassetlaw with its main settlements suitable and able to accommodate urban extensions. Directing development to the main settlements as urban extensions is a more sustainable	Suggested changes: None.	Officer comments: Noted.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			approach to meeting development need. The removal of the Bassetlaw Garden Village allocation under draft Local Plan Policy ST3 and ST4 is supported.		
Representation Reference: SA-NRF013.1 Name: Fisher German on behalf of The Hospital of the Holy and Undivided Trinity	Refers to: POLICY ST3 and ST4 - Bassetlaw Garden Village	Legal compliance and soundness: Legal compliance, compliance with the Duty to Cooperate and soundness not indicated.	Comments: The proposed amendments, which extend to the deletion of the Garden Village as an allocation and updates to the housing land supply, are supported. Sites identified for allocation in a Local Plan should be deliverable. It is clear that the land required for delivering the Bassetlaw Garden Village is no longer available and as such, not deliverable. The proposed deletion of Bassetlaw Garden Village (Policy ST3) is supported.	Suggested changes: None.	Officer comments: Noted.
Representation Reference: SA-NRF016.2 Name: Sport England	Refers to: POLICY ST3 and ST4 - Bassetlaw Garden Village	Legal compliance and soundness: Plan is legally compliant, sound and complies with the Duty to Cooperate.	Comments: It is clearly disappointing for all, that the opportunity to develop the Garden Village, as an exemplar of a development which encourages a healthy, active lifestyle through active design and active travel based on garden city principles, in a sustainable connected way is not now able to proceed. Hope that the lessons learned can be utilised in other developments to support and encourage through design, healthy and active lifestyles.	Suggested changes: None.	Officer comments: Noted.
Representation Reference: SA-NRF017.2 Name: Nottinghamshire County Council	Refers to: POLICY ST3 and ST4 - Bassetlaw Garden Village	Legal compliance and soundness: Legal compliance, compliance with the Duty to Cooperate and soundness not indicated.	Comments: Note that the Addendum deletes the Garden Village allocation from the Plan owing to one of the landowners withdrawing their interest in the proposal. The Addendum also updates the Plan with reference to time periods and consequential numerical adjustments.	Suggested changes: None.	Officer comments: Noted.

Delivering Economic Prosperity

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Representation Reference: SA-REF009.1 Name: Gentina Developments Ltd	Refers to: POLICY ST7 - Provision of Land for Employment Development – allocated employment land	Legal compliance and soundness: Plan is legally compliant and complies with the Duty to Cooperate. Plan is unsound.	Comments: Inconsistent with the NPPF and is unsound. The Plan doesn't consider the number of allocations which are under construction and to be completed within the early stages of the local plan and the impact that may have on supply, particularly towards the later years of the Plan Period. The Housing and Economic Needs Assessment (April 2022) notes the updated land employment land need is 196.7ha. The updated supply position is 189.4ha. This leaves a 7.3ha deficit of general and larger unit employment land before the Apleyhead Junction Strategic site is added. Policy ST7 lists a number of sites which have the benefit of planning permission. This notes that there is the potential residual development land of 183.2ha. Within this, the Snape Lane (42ha) and Symmetry Park (14.4ha) are under construction. 56.4ha of land could be completed/partially complete by the time the Local Plan is adopted. Additionally, the Manton Wood Extension has been pre-let to DHL on a 20year lease who have detailed permission for Phase 3 and a current application in with planning for Phase 2 removing another 10.7ha from general employment. Currently 56.4ha of consented employment use under construction at Snape Lane and Symmetry Park. When considered strategically from adoption (mid/end 2023) there will be a total of circa 65 ha of employment space	Suggested changes: <ul style="list-style-type: none"> Reconsider the districts objectively assessed needs without the reliance of the strategic employment site, given this is a regionally strategic allocation. Employment sites which can deliver a range of sized units should be encouraged. Need new allocations within Policy ST7 to allow for additional floorspace which can cover the deficit identified as well as being able to service a range of uses and users on the site. Land to the North of Serlby Road (LAA580) in the Updated Site Selection Methodology was 	Officer comments: It is considered that the HEDNA Addendum 2022 and the approach taken to Policy ST7 in the Publication Plan is appropriate to meet general employment needs, with sufficient flexibility built in through a buffer, equivalent in employment terms of 10%, which is consistent with national policy. Policy ST7 recognises that Apleyhead is identified to meet a regional logistics need so is considered as distinct to the general employment land position. No additional general employment sites are required. It is considered that the Sustainability Appraisal and Site Selection Methodology provide an appropriate basis to assess sites and their suitability to address the district's employment need.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>nearing completion/pre-let within year 1 which could impact supply further down the line. This has not been considered; given its strategic location there is more demand than supply. The significant pre-let's would suggest this. Paragraph 6.1.25 and the evidence suggests that the recent past rate of take up/delivery under represents future needs and that Bassetlaw could contribute to meeting this future economic sub regional/ regional need for Logistics, which would suggest that the area is in demand for this sector. Given the evidence suggests a completion trend, there is potential for a further deficit of employment land coming forward, towards the end of the plan period, which doesn't seem to have been addressed within the Policy. Apleyhead Junction will provide an additional 118.7ha of employment floor space, this strategic site is being put forward as a site of regional importance and will service the logistic sector (B8 use only). This should be included within its own entity as it does not conform with the General and larger Unit employment sites. The total amount of employment land proposed falls below that required through the evidence and does not comply with the NPPF Para 35(a) which requires Local Plans to be positively prepared and as a minimum to meet the areas objectively assessed needs. The reliance of complementary policy</p>	<p>assessed as having the potential for logistics and discounted as a reasonable alternative. A capacity study shows that the site is capable of delivering circa 30,000sqm of flexible employment floorspace, with details to be agreed.</p> <ul style="list-style-type: none"> • Site north of Serlby Road (LAA580) provides an opportunity to provide the required level of additional employment floorspace over the plan period. The site is available, deliverable and achievable within the local plan period. • Proposed site-specific policy wording submitted. 	

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>mechanisms for the delivery of the general business growth such as the renewal of existing employment sites (ST10) and business growth in the rural area (ST11) may not be enough to provide adequate business space across the Plan Period, particularly as the local plan does not allocate enough employment space to meet demand before the Strategic Allocation Apleyhead Junction is considered. Occupiers are constantly seeking premises which are more sustainable. Retrofitting existing stock could be undertaken, there may be an impact in terms of replacement supply etc. There is nothing in the policy to suggest that there will be a net increase of employment floorspace within this policy to meet the unmet demand. No new allocations for General and Larger Unit Employment sites have been included other than those which have extant planning permission and/or under construction. Fails to meet NPPF point b) of Para 35 as it does not provide an appropriate economic growth strategy for the plan period. No alternative sites put forward for consideration to meet the identified unmet demand (7.3ha), or has it considered the DHL lease on Manton Wood which nullifies that site as general employment site, or that there will be circa 56ha of sites coming forward at the early stages of the plan period.</p>		

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>The Local Plan also fails to meet criteria c) as without modifications it would not be effective to meet the identified demand for employment floorspace within the plan period. Refers to site submission and SA assessment for Serlby Road: It is considered that any development on the site would be required to provide a biodiversity net gain by legislation; SA Objective 1: Biodiversity and geodiversity could at least achieve 'minor positive effective likely' score as a minimum. It is likely that any development on the site would benefit from the use of at surface SUDS, which could be used as part of a wider blue network biodiversity gain on the site and link to the adjacent pond. SA Objection 8: Water could have a more positive score. Initial highways comments have been noted and would form part of any planning application; would be able to provide safe access in and out of the site. Road widening could be undertaken at the site by developing into the verge of the road. There is potential for the installation of a footway which will connect to the existing footpath for the A1 flyover footway and for a reduction of speed along Serlby Road, which would also improve highways safety. Whilst there may be an element of logistics which might come forward, the proposal would seek to provide smaller, flexible units which would likely be delivered in phases throughout the Local Plan period.</p>		

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Representation Reference: SA-REF011.1 Name: Barton Willmore now Stantec on behalf of Caddick Developments Ltd	Refers to: POLICY ST7 - Provision of Land for Employment Development – SEM001	Legal compliance and soundness: Plan is legally compliant and complies with the Duty to Cooperate. Plan is unsound.	Comments: Caddick continue to promote land at Apleyhead Junction for approximately 4.7m sqft of large scale employment uses (predominantly B8 with some B2, and ancillary offices), and are actively assessing the options for delivery of this strategic opportunity. Support the emerging plan particularly the allocation of Apleyhead (site SEM001). The allocation is sound, and the site is deliverable within the plan period. Consider plan policies (Policy 9 in particular) would benefit from revised and simplified wording to ensure delivery of the site is not unnecessarily constrained by policy requirements. Since the previous consultations have continued to progress the technical work required to submit a planning application such that we are now in a position that an Outline planning application could be submitted in the short term. The Environmental Statement and associated technical reports are in final draft form and overall assumptions within those reports is aligned with consultee feedback received during the pre-application stage. Held public consultation (November 2021) which provided generally positive feedback, with respondents particularly supportive of new jobs and investment. This public consultation sat alongside other consultee and stakeholder focussed engagement. There is active occupier	Suggested changes: None.	Officer comments: Noted.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>interest in units of up to 1.2m sqft, showing the strength of the market and the attractiveness of Apleyhead Junction as a major location. Now assessing how these occupiers could be accommodated within the site and how the resultant phases could be delivered. Prudent to review the timings for submission of an application until the detail of the interest is confirmed with the proposal then specifically geared to meet these known occupier requirements. As a result, there is potential that a Hybrid planning application could be submitted, with the detailed elements of the application tailored to meet these occupier requirements. Whilst a planning application may not be submitted immediately in Outline, a later Hybrid application could in reality result in an earlier start on site and first phase delivery as far greater detail will be provided up front. Significant progress has been, and continues to be, made towards delivering the site.</p>		

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Representation Reference: SA-REF011.2 Name: Barton Willmore now Stantec on behalf of Caddick Developments Ltd	Refers to: POLICY ST7 - Provision of Land for Employment Development – Point 3 section e)	Legal compliance and soundness: Plan is legally compliant and complies with the Duty to Cooperate. Plan is unsound.	Comments: Continue to support the overall strategic direction of ST7 in that it correctly identifies the importance of Apleyhead Junction as a strategic employment site. The ST7 revisions where they relate to Apleyhead to be unjustified. Part 3 of ST7 considers Apleyhead Junction specifically. The site-specific elements of ST7 are better placed in the site-specific Policy 9 and should be modified to be sound, irrespective of whether these items are within ST7 or Policy 9. Contains firmer requirement for proposals at the site to not adversely impact on other growth strategies and allocations in the Bassetlaw plan and/or other local plans in the area (ST7 Part 3(e)). Question the necessity of such an approach. Concerns with a requirement for alignment with other adopted local authorities' plans and strategies, as alignment with other authority plans is a matter for the local plan process and not the planning application process. Although other local authorities are seemingly supportive of the plan, ST7 part 3(e) creates unnecessary risk that an adjacent authority could unreasonably object to the application which in turn gives authorities other than Bassetlaw greater control over how the site is delivered. Furthermore, the local plan evidence base is clear on the reasons for, and benefits of, allocating the site.	Suggested changes: Part 3(e) of ST7 should be removed, and particularly where it refers to other authorities plans.	Officer comments: Policy ST7 Part 3(e) is proposed to ensure that the approach taken to Apleyhead, including the mix of uses delivered does not adversely impact the growth strategies of neighbouring authorities and adjoining functional economic market areas. It is acknowledged that authorities within the property market area are supportive of the site being made available to support an identified need for logistics and the Publication policy approach. This is evidenced through a statement of common ground.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Representation Reference: SA-REF011.3 Name: Barton Willmore now Stantec on behalf of Caddick Developments Ltd	Refers to: POLICY ST7 - Provision of Land for Employment Development – Point 4	Legal compliance and soundness: Plan is legally compliant and complies with the Duty to Cooperate. Plan is unsound.	Comments: Part 4 of ST7 (as introduced in the Second Addendum consultation) seeks to limit Apleyhead Junction to B8 and ancillary uses only. However, the policy lacks flexibility as the site could quite conceivably accommodate a large scale B2 or mixed B2/B8 Use unit that could not be accommodated elsewhere. In that eventuality, such a proposal could be contrary to ST7 as drafted which introduces unnecessary risk that major inward investment to Bassetlaw is lost due to unnecessarily constraining planning policy requirements.	Suggested changes: ST7 should be modified to include B2 in addition to B8, to ensure there is flexibility to meet market requirements.	Officer comments: Part 4 of Policy ST7 has always been in the Publication Plan. The May 2022 Second Addendum re-structures the policy criteria for ease of use. Apleyhead is proposed to meet a regional/sub-regional need so is considered distinct to the general employment need. The A1 Corridor Logistics Assessment Update 2022 has only considered the demand for logistics at a regional/sub regional level. It is therefore considered that the approach to specifying logistics use only is justified and evidence led.
Representation Reference: SA-NRF018.1 Name: Gladmans Developments J Plant	Refers to: Policy ST7: Provision of Land for Employment Development	Legal compliance and soundness: Not specified	Comments: Policy ST7 builds on the Council Plan aspirations and capitalises on the District's locational advantage by promoting employment locations with proximity to the A1/A57 strategic road network and local labour, which also provide strategic connectivity to the M1, the wider East Midlands region and South Yorkshire. The allocation of the site supports the economic aspirations of the district through providing flexible support of employment land which meet	Suggested changes: None	Officer comments: Noted.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			the increased employment and logistics demand along the A1 and A57 corridors as identified in the A1 Corridor Logistics Assessment Final Report (August 2021). Welcome the allocation of the former Bevercotes Colliery, which benefits from extant planning permission for redevelopment to B2 and B8 uses and support the updated employment land provision of 43 ha. This reflects the net developable area referred to in the extant planning permission. The redevelopment of the former colliery will remediate and reclaim a significant brownfield site which aligns with the Strategic Objectives of the Plan as well as significant benefits from economic growth and employment generation.		
Representation Reference: SA-REF012.2 Name: National Trust	Refers to: POLICY ST7 - Provision of Land for Employment Development	Legal compliance and soundness: Legal compliance and compliance with the Duty to Cooperate not specified. Plan is unsound.	Comments: Following changes to Policy ST7 including removal of employment land at the Garden Village and adjustments to supply at other sites, the overall employment land supply in the Local Plan Second Addendum has been boosted to a total of over 300 hectares. The evidence identifies that Snape Lane and Bevercotes Colliery are capable of accommodating larger employment units. The major greenfield Strategic Employment Site of over 100 hectares at Apleyhead also remains in the plan. Remain concerned by the level of greenfield development promoted, with potential ramifications for the capacity of the highway	Suggested changes: The proposed employment supply for the district should be reviewed with the aim of providing a reasonable, sustainable level of development. This should have regard to environmental and transport impacts and the capacity of existing highway infrastructure.	Officer comments: It is considered that in accordance with the NPPF, the Plan seeks to make as much use as possible of brownfield land. Authorities within the logistics property market area have agreed a statement of common ground relating to the principle and proposed use of Apleyhead for logistics to meet an identified regional/sub-regional need. The Bassetlaw Transport Study 2022,

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>network and for the local environment. Chapter 11 of the NPPF sets out the ways in which planning policies and decisions should seek to make effective use of land, making as much use as possible of previously-developed 'brownfield' land and taking account of the availability and capacity of infrastructure. Welcome the inclusion at ST7(e) of a policy proposal that development at Apleyhead should not compromise delivery of other adopted employment allocations in Bassetlaw or the wider property market area, although it is not clear how this will work in practice. Remain concerned by the uncertainty around transport impacts on the A57 corridor (the Transport Study has not been updated), the ability of the road network to cope with increased traffic levels, and the cost/feasibility and environmental impacts of any required transport improvements. Should the level of additional traffic generated require road widening at the eastern end of the A57, this is likely to have direct impacts on a local nature site and/or 'inalienable' land within Clumber Park Grade I Registered Historic Park and Gardens. The feasibility of this has not been established.</p>		<p>accepted by Nottinghamshire County Council, identifies the need for a credible mechanism to determine the approach taken to the A57 in the long term, but does not require the mechanism to be in place at this point. The objectives and work programme have been agreed with the highways authority and other partners.</p>

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Representation Reference: SA-REF015.1 Name: Derek Kitson Technologist Ltd	Refers to: POLICY ST7: Provision of Land for Employment Development	Legal compliance and soundness: Plan is legally compliant and complies with the Duty to Cooperate. Plan is unsound.	Comments: The removal of the employment aspect of the Garden Village (10 hectares) should open the door to other A1 corridor employment sites to be brought forward. The A57/A1/A638 junction at Markham Moor is perfectly located to serve the south of the district. The A1 connection with 2 main roads, one heading to Lincoln, the other back north to Retford, is a bonus, as are the existing service facilities which should be expanded to provide further enhanced HGV provisions, together with EV charging points and other eco-friendly energy provisions. There are large areas of flat land surrounding this “hub” that could easily provide for both further service provision and other major employment opportunities.	Suggested changes: A recognition of the important role employment and service provision at Markham Moor can provide should be made. The Local Plan should provide a variety of possible employment sites together with further service industry provision including large scale EV charging facilities.	Officer comments: It is considered that the Land Availability Assessment, Sustainability Appraisal and Site Selection Methodology provide an appropriate basis to assess sites and their suitability to address the district’s employment need.
Representation Reference: SA-NRF020 .1 Name: Rotherham Metropolitan Borough Council	Refers to: POLICY ST7: Provision of Land for Employment Development	Legal compliance and soundness: Not specified	Comments: Comparing the HEDNA Addendum 2022 to the HEDNA 2020, it is acknowledged that there is an overall increase in the employment floorspace and the number of jobs anticipated, due to Bevercotes Colliery and the Manton Wood extension. Given the scale of the Bevercotes Colliery site, it would be helpful to clarify why the site was not included in the previous assessments. The Local Plan could acknowledge Class E(g) in line with the latest Use Class Order (para 5.1.16 is referring as ‘B Class employment use’) if this is the intention.	Suggested changes: None	Officer comments: Bevercotes Colliery has an extant planning permission for employment use. The landowners indicate that there has been a change in status in relation to deliverability; which the HEDNA Addendum 2022 recognises. On that basis it should be included in Policy ST7. It is acknowledged that for consistency with national legislation paragraph 5.1.16

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
					would benefit from a minor modification as: At 31 March 2022, 50,005 sqft of employment floorspace had been completed ⁸ on the General and Larger Unit Employment Sites, 56.4 ha of such employment land is under construction, whilst a further 132.4ha has planning permission for E (g) and B Class employment.
Representation Reference: SA-NRF020.2 Name: Rotherham Metropolitan Borough Council	Refers to: POLICY ST7: Provision of Land for Employment Development	Legal compliance and soundness: Not specified	Comments: The Council, along with other South Yorkshire authorities, previously expressed concerns regarding the proposed provision of strategic employment land and the strategic employment site SEM01: Apleyhead Junction. It was considered the allocation of this site could pose a risk to the economic aims of Sheffield City Region and the wider D2N2 region. Note the A1 Corridor Logistics Assessment has been completed and the policy changed, limiting the use to B8. These changes go some way to alleviating concerns. However, remain concerned that the employment growth supported by the proposed aspirational housing growth, could have significant implications for communities in the South of Rotherham in terms of promoting commuting from Rotherham to	Suggested changes: None	Officer comments: The Local Plan promotes a strategy of greater self-containment, with the number of jobs promoted being balanced by the number of dwellings. This will reduce out-commuting and long-term unsustainable travel patterns. However, both Councils are working jointly through the A57 Improvement Plan Project Group to consider the potential traffic impacts from both local authorities Local Plans, as well as impacts associated with non Local Plan growth, including

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			Bassetlaw with the associated implications for increased traffic congestion and carbon emissions. Remain concerned that the traffic impact of the development on the A57 link to the M1 has not fully been considered. At least part of the traffic generated will head to the M1 northbound through South Rotherham. Given that the route is already congested and creates considerable community severance at South Anston, additional traffic would require some form of mitigation to be put in place. Logistics use would generate more than two-way daily traffic for employees and encouragement of the use of sustainable transport alone is unlikely to prove adequate.		from outside the authority boundaries. 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 to address impacts upon the A57 in the district. No impacts were identified outside the boundary. 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 Council facilitate the Improvement Plan and associated work. The work programme and timetable has been agreed with Rotherham and partners.
Representation Reference: SA-REF019.3	Refers to: POLICY ST7: Provision of Land for	Legal compliance and soundness: Plan is not	Comments: Concerned that insufficient employment land is identified, suggest that Gamston Airfield should be included as a Strategic Employment allocation. The level of new employment allocations do not	Suggested changes: <ul style="list-style-type: none"> • Meet the economic growth aspirations for the District and region. 	Officer comments: It is considered that the HEDNA Addendum 2022 and the approach taken to Policy ST7 in the Publication Plan is

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name: Spawforths on behalf of HBD	Employment Development	legally compliant and is unsound. Compliance to the Duty to Cooperate not specified.	reflect the regional and sub/regional need as set out in local industrial strategies and due to the changed circumstances brought about by the Post Covid economy and significant uplift in on-shoring, logistics, levelling up funding and UK Government intention to significantly grow the economy. It is evident that the economic growth aspirations are not being met and further employment allocations need to be identified. Their strategically important employment site at Gamston Airfield should be allocated within the plan to reflect the scale of the need on the strategically important A1 corridor. Several industry reports show that market activity has returned post lockdown and that the outlook for the industrial and logistics sector is positive. Occupational demand is being underpinned by a range of solid long term drivers, and anticipate an ongoing elevated demand. Whilst demand is remaining high, supply has dropped to some of its lowest levels. The Covid-19 pandemic, Brexit, the climate crisis and global economic conditions have all contributed to a significant change in conditions. This demonstrates that rather than a temporary shift, the rise in online shopping is a permanent change that has been accelerated by Covid-19 pandemic and Brexit which needs to be planned for appropriately, therefore the reliance upon previous trends is not appropriate. Refers to a detailed and up to date (May 2022) market	<ul style="list-style-type: none"> • Identify further employment sites. • Allocate a strategic employment site at Gamston Airfield. 	appropriate to meet the district's employment needs, appropriately reflects the impacts of Covid, and has sufficient flexibility built in through a buffer, equivalent in employment terms of 10%, which is consistent with national policy. It is considered that the Land Availability Assessment, Sustainability Appraisal and Site Selection Methodology provide an appropriate basis to assess sites and their suitability to address the district's employment need. No additional sites needed.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>overview of the National, Regional and Sub Regional industrial and logistics market. Regarding the national picture they state: “The industrial and logistics sector performed remarkably during 2021, breaking records in terms of take up as e-commerce and the rise in consumerism continue to accelerate trends which are driving the market. This shows no sign of abating during the first half of 2022, with take up at the end of Q1 2022 totalling just over 10m sq. ft., 40% ahead of the quarterly average since 2010.”“The rise in e-commerce has been the major catalyst for growth in the warehousing and logistics sector, a trend only accelerated by the Covid-19 pandemic. Online retailers reported record earnings as consumers shifted spending online during national lockdowns. Demand for warehouse space has been buoyed by this continued growth in online retail.”“National take up of warehousing space (100,000 sq. ft. plus) reached 50.7m sq. ft. in 2021, 3.4% up year on year, as occupiers continue to remodel their supply chain in order to meet with current order fulfilment requirements. ESG requirements are increasingly at the forefront of occupiers requirements when considering warehousing space, which is undoubtedly causing a “flight to prime” approach, with take up of new build speculative facilities the highest it’s been since 2011.” Regarding the North Midlands state</p>		

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>that: “has attracted large scale requirements over the last 5 years, including Amazon (1.75m sq. ft.), Alloga (249,000 sq. ft.), Eddie Stobart/iForce (268,800 sq. ft.), DHL (528,000 sq. ft) & Eurocell (268,800 sq. ft). An unnamed occupier is rumoured to be under offer upon the 250,000 sq. ft. building at Panattoni Park Central M1 at South Normanton. All of these, save for the DHL deal at Manton Wood in Worksop, are located around J28 of the M1. Further north at J29a occupiers such as Great Bear have committed to facilities of over 500,000 sq. ft. and B&Q have just committed to 430,000 sq. ft on Symmetry Park, Blyth. Whilst the majority have taken place along the M1 corridor, the market is becoming more constrained and large scale requirements are now landing along the A1 corridor including DHL and B&Q. “Supply in the East Midlands has fallen from 5.69 m sq. ft across 27 buildings to just 2m sq. ft across 8 buildings, representing a decrease of 65%. Take up in the East Midlands doubled between 2017 and 2021, with a total of 12.4m sq. ft being leased in 2021, compared to 6.2m sq. ft in 2017 which was 27% above the five year average of 9.8m sq. ft.”</p> <p>There remains a significant demand/supply imbalance within the logistics sector, with the East Midlands currently having the lowest vacancy rate in England at 2.8%. The JLL multi –let and mid box industrial market report June 2022 states that:</p>		

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			<p>“Vacancy rates have tumbled to sub 5% in many major markets and rental growth has surged with rents hitting new highs. Over 2021 prime headline rents for units between 10,000 sq. ft. and 20,000 sq. ft. increased by an average of 16% across the UK with a further uplift of 6% in Q1 2022. Industrial land values have skyrocketed over the past 12 months.”“Immediately available supply at the end of March 2022 totalled 829,000sqft. This comprised 217,000 sq. ft. smaller units and 612,000 sq. ft. in mid box buildings. There is also a further1.6 million sq. ft. in the East Midlands including schemes at Total Park, Nottingham; Genesis Park, Leicester and St Modwen Park, Derby.” Note that “Like most regions across the UK, demand in the East Midlands is outstripping supply with immediately available space only accounting for around eight months of 2021 take-up.” An industry report (May 2022) to assess the market conditions related to Gamston Airfield noted that the site is strategically located to serve markets across the region. The report states that: “Within a one hour drive time, Gamston airfield picks up a large labour catchment area...” This includes a population of 216,700 within a 10 mile radius of the site. “The A1 junction is adjacent to the subject site and provides direct access both North and southbound. It also feeds directly to A1(M) and provides rapid and easy access to the</p>		

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			<p>M18/M1, M62, A46/M1, A14, A421/M1 confirming its excellent strategic location.” The site is also served by Retford Railway Station 4 miles away providing regular services via LNER to London, Doncaster, Leeds and Lincoln. “The location is also strategically located close to several key ports, namely, the Port of Hull and the Port of Immingham which are both within 55 miles north east of Gamston Airfield. The Port of Immingham is the UK’s largest port by tonnage, handling around 55 million tonnes per year. The port can handle vessels carrying cargos of up to 130,000 tonnes and is less than 24 hours from a European market of over 170 million people.”</p> <p>Concurs with other industry insight that there is a severe shortage of industrial and logistics space across the country: “Such an acute imbalance in supply and demand caused a 5.10% quarterly increase in Q1-22. Regionally, it was the East and West Midlands which recorded the strongest rental growth in Q1 – both at 8%. In the two years since the pandemic began in Q1 2020, average prime headline rents have increased by an incredible 25%, this is more than the growth recorded in the entire five years prior to the pandemic..” Take up rates are pronounced in the East Midlands; recorded the highest level of take-up of logistics space in the first quarter of 2022, accounting for almost half (46%) of the total space</p>		

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>taken across the UK. At the end of Q1, the region had a vacancy rate lower than the UK average at 1.1%. There is a significant under provision of employment land in the wider region, the A1 corridor is of regional and sub-regional significance and the current approach is not capitalising on the opportunities to deliver good growth and jobs and will harm the regional economy. Gamston already houses operational employment occupiers including industrial & logistics, alongside Thatcham's newly formed research & development facility. Previously a preferred site for the Bassetlaw Garden Village. The Bassetlaw New Settlement Study, April 2018. concluded that: "The site at Gamston Airport was found to be relatively free from any significant constraints and the site also benefits from being classified as previously developed land due to its current use as an Airport." "The present use of the site is considered to be an inefficient use of land which could otherwise be developed for a use which is in much need, and a use which would ultimately provide a greater long term social and economic benefits to the local and wider District and economy through the creation of a sustainable settlement." This is still the case and the site would be better used as a location to satisfy the regional demand for industrial and logistics space. Gamston Airfield provides a</p>		

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			development opportunity that is available, suitable and achievable, in accordance with national planning policy and guidance and is deliverable within the plan period. Working alongside the landowner of the old airfield and surrounding Farmland at Gamston Airfield. The active Airfield buildings and runway are controlled by Thatcham who are actively developing automotive research and development facilities on site for which Gamston airfield will be a key UK strategic site; considered likely to generate demand for connected and complimentary businesses and supply chain providers. The wider development of Gamston Airfield would enable this growth to be facilitated and in turn further employment opportunities. Part of the site is home to thriving logistics and industrial businesses. Is located in a highly sustainable location for general employment and logistics. The site fronts and has direct access to the A1 and is in close proximity to the A57/M18/A46 and is suitable for large scale development. Offers significant opportunities for the improvement of services in the nearby settlements at Gamston and Elkesley. Free from any significant natural landscape features and development of the site has the potential to improve the overall landscape value of the site by "introducing planting which would add relief and interest to this otherwise		

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>uninteresting landscape.” and can be realised without causing any significant harm to the setting of heritage assets. Note that the HRA Screening Report identified a significant effect in relation to biodiversity. Contest this, suitable design and mitigation can be put in place to address but to enhance biodiversity in line with the Environment Act 2021. The response from the Civil Aviation Authority regarding the Government’s Aviation 2050 strategy is no longer relevant as the consultation on the Aviation 2050 strategy has concluded. Gamston Airfield has not been safeguarded and the site is not strategically important for General Aviation. Thatcham Research are onsite creating a testing and research facility following approval of detailed planning permission. Will build upon this unique centre for research and development in Bassetlaw creating a hub for new highly paid jobs and building upon the excellent progress which Thatcham have already made. A range of technical work is being undertaken and further survey work is ongoing. From the initial assessments there are no technical issues that would prevent development or are insurmountable. The site is previously developed and easily accessible from the A1 and A57 in a strategically important location. The proposal is therefore making an efficient and effective use of land and</p>		

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>infrastructure. The NPPF requires Local Planning Authorities to create the conditions in which businesses can invest, expand and adapt and should support economic growth aspirations. Early phases of the site are fully capable of being delivered in the short term to meet immediate gaps in the supply. The proposal responds positively towards national guidance. The site is appropriate for accommodating Strategic employment growth, being effectively an expansion of an existing employment park. It is in a suitable location for Strategic Industrial and logistics development. The site has been assessed and is available, suitable and achievable for development. The site would provide employment that would meet the needs of Bassetlaw and the wider region. The site can provide a Gateway scheme for both the Sheffield City Region and East Midlands (D2N2). As well as delivery of significant industrial and logistics development the scheme could provide opportunities for R&D, advanced manufacturing, automotive testing and research. The proposal will enable Gamston Airfield to become a strategic employment hub to drive good growth in the region. The proposal will deliver high quality employment and job opportunities. The scheme will create direct and indirect job opportunities both during and after construction.</p>		

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Representation Reference: SA-NRF020.2 Name: Spawforths on behalf of Network Space	Refers to: POLICY ST7: Provision of Land for Employment Development	Legal compliance and soundness: Plan is not legally compliant, is unsound and does not comply with the Duty to cooperate.	Comments: Insufficient employment land is identified. There is an under provision of new employment allocations when compared to the “appropriate target” of 196ha to meet the needs of Bassetlaw. It is evident that the economic growth aspirations are not being met and further employment allocations need to be identified. Extension land at Manton Wood Distribution Park be allocated to address this shortfall in employment land. This is pertinent now that the committed and largely developed Manton Wood scheme is included within the general employment allocations in Policy ST7. The extension land to the east be included to address this shortfall and provide choice and flexibility in employment land. Welcome that the potential of the site for employment has been recognised within the Site Selection Methodology (Update May 2022). Concerned that conclusions, albeit qualified dependent on scheme detail, on heritage and ecology are made without recognising the adjacent permitted and largely developed Manton Wood Distribution Park and that the woodland is a managed plantation. Recognition is made that the comments are not based on a detailed scheme; should recognise locational characteristics and surrounding developments including permitted and developed schemes. Considerable planting	Suggested changes: Meet the economic growth aspirations for the District and region. <ul style="list-style-type: none"> • Identify further employment sites. • Allocate the extension land at Manton Wood Distribution Park. 	Officer comments: It is considered that the HEDNA Addendum 2022 and the approach taken to Policy ST7 in the Publication Plan is appropriate to meet general employment needs, with sufficient flexibility built in through a buffer, equivalent in employment terms of 10%, which is consistent with national policy. It is considered that the Land Availability Assessment, Sustainability Appraisal and Site Selection Methodology provide an appropriate basis to assess sites and their suitability to address the district’s employment need. No additional sites are required.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>and trees would remain on site. The scheme will only use a portion of the managed commercial woodland and there will be a significant portion retained, which will leave a buffer to the north of the Old Coach Road and to the east towards the Lodge, which will preserve its amenity. Understand that biodiversity and ecology are important, it is recognised that any removal of trees requires suitable compensation. The site has a long and considerable frontage onto the A57 and a suitable access can be provided and there are no constraints. The site would further reinforce the provision of employment in this location and the success of the adjacent Manton Wood Distribution Park. The site is located on the A57 and is an eastward extension of the existing Manton Wood Distribution Park, occupied by DHL. To the north is Wilko and to the north east is the proposed Apleyhead regionally significant employment site. The site is circa 24.5ha and is a managed commercial woodland. The proposed scheme would retain woodland around the edge of the site and along the A57 and Old Coach Road, and replant the area of trees felled. The site could accommodate in the region of 600,000 sq. ft. of employment. It is available, suitable and achievable and is deliverable, in accordance with national policy. Own and control the extension land at Manton Wood Distribution Park. The site is</p>		

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			located in a sustainable location for general employment and logistics and is in a highly industrialised area. The site would extend the existing Manton Wood Distribution Park now occupied by DHL. The site is on the A57 close to the A1 junction. The site is in a suitable location, which states that local plans should recognise and address the specific locational requirements of different sectors. A range of technical work is being undertaken and further survey work is ongoing. An assessment on the proposed access confirms that access can be provided to the site from the A57. There are no technical issues that would prevent development or are insurmountable. The site is greenfield, the proposed scheme will utilise and enhance existing infrastructure. It is currently under-utilised and is a managed commercial woodland. The site is easily accessible and the site can be accessed from the A57. The scheme is making an efficient and effective use of land and infrastructure. The NPPF requires Local Planning Authorities to create the conditions in which businesses can invest, expand and adapt and should support economic growth aspirations. The site is deliverable in the short term and will reinforce the economic growth aspirations of the District. The site is fully capable of being delivered in the short term. The proposal responds positively towards national guidance, is		

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			appropriate for accommodating employment growth, effectively an expansion of an existing employment park; is in a suitable location for general employment and storage and distribution. The site would provide employment that would meet the needs of Bassetlaw. Plans submitted to show two scheme options. The proposal will deliver high quality employment and job opportunities and will create direct and indirect job opportunities both during and after construction.		

Living Communities

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name:					
Representation Reference: SA-NRF002.1 Name: Resident	Refers to: POLICY ST15 - Provision of Land for Housing – HS1 Peaks Hill Farm	Legal compliance and soundness: Legal compliance, Soundness and Compliance with the Duty to Cooperate - not specified.	Comments: The field behind my house was constantly flooded from the run off from new development on Blyth Road/Thievesdale Lane, so many trees chopped down so nothing to hold the water. Homes have to be built, but should be on brown sites not green.	Suggested changes: None.	Officer comments: The Plan proposes development on brownfield land, but there is insufficient suitable brownfield land available to meet the identified housing need and provide for affordable housing.
Representation Reference: SA-NRF003.1 Name: Resident	Refers to: POLICY ST15 - Provision of Land for Housing – HS13 Ordsall South	Legal compliance and soundness: Legal compliance, Soundness and Compliance with the Duty to Cooperate - not specified.	Comments: Note that the contractor will be obliged under section 106 to fund any infrastructure caused by the building of the development. Confirm that: The contractors will have to meet the full cost of these. The contractors will be required to sign legal paperwork to meet these costs That they will not be able to appeal after the development is completed against the costs involved. The paper work slightly confusing. Is the plan stating that contractors are required: To build a doctors surgery; To build a community centre, To build a local shop or is it simply to leave land available for these as is the case for the proposed school.	Suggested changes: None.	Officer comments: All infrastructure requirements set out in Policy 27 will need to be addressed by the developer. The developer will enter into a S.106 legal agreement to ensure that necessary infrastructure required to mitigate the impacts of the development is addressed. In the case of the school the developer will provide land and contributions to enable NCC to build it. The arrangements for other infrastructure will be agreed with the infrastructure provider through the planning application process.

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name:					
Representation Reference: SA-REF005.3 Name: Barton Willmore (Stantect) on behalf of (Howard) Retford Limited	Refers to: POLICY ST15 - Provision of Land for Housing – Point 1	Legal compliance and soundness: Plan is legally compliant and complies with the Duty to Cooperate. Plan is unsound.	Comments: The removal of the Bassetlaw Garden Village from the emerging Local Plan would not impact the delivery of the overall spatial strategy. The vast majority of the Garden Village was anticipated to come forward beyond the plan period of 2038. It should not be used as a reason to reduce the number of residential units it is seeking to deliver over the plan period. Draft Local Plan Policy ST1 bullet 1b states that the Council’s housing requirement is a minimum.	Suggested changes: The residual capacity of allocations should be delivered within the plan period where there is demand. Confident that all 1,250 residential units can be delivered at HS13 Ordsall South within the plan period which would further enhance the housing supply.	Officer comments: A prudent approach to assumed delivery on allocated sites has been taken. It is based upon historic delivery trends in Bassetlaw and national evidence. This is outlined in the Housing Supply, Trajectory and Windfall Background Paper, May 2022.
Representation Reference: SA-NRF015.5 Name: Resident	Refers to: POLICY ST15 - Provision of Land for Housing	Legal compliance and soundness: Not specified	Comments: Add the Stonegate Farm site to the Housing Allocations table within Policy ST15 as site H6. Site size is 4ha with capacity to deliver 65 units with the remainder of the site required for retail, leisure and employment land.	Suggested Comments: None	Officer comments: It is considered that the Land Availability Assessment, Sustainability Appraisal and Site Selection Methodology provide an appropriate basis to assess sites and their suitability to address the district’s housing need.
Representation Reference: SA-REF013.3 Name: Harris Lamb on behalf	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: Land at Bigsby Road, Retford (LAA022) in the Site Selection Paper is not identified as a draft allocation in the Plan. Assessment of Ordsall South via the Sustainability Appraisal and the Site Selection Methodology resulted in similar	Suggested changes: Alternative SUEs around the more sustainable settlements such as the land north of	Officer comments: It is considered that the Land Availability Assessment, Sustainability Appraisal and Site Selection Methodology provide an appropriate basis

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
of Muller Property Group		Plan is unsound.	findings to that of Bigsby Road site. Ordsall South is located in a Green Gap and any development within this will erode the gap between Retford and Eaton. There are other sites around Retford that are not located in a Green Gap, such as the land at Bigsby Road. Whilst Ordsall South was preferable as an allocation, contend that a number of the issues raised regarding the land at Bigsby Road are capable of being addressed through the preparation of a detailed masterplan and careful design of the scheme. An appropriately designed scheme could come forward if needed. Bigsby Road would be able to deliver the same benefits as Ordsall South in terms of housing, associated infrastructure and open space. Has the potential to deliver 450 dwellings which would help address the shortfall in the current supply and add flexibility in the future provision of dwellings. Do not consider the plan sound as it is not effective and the proposed SUE to the south west of Retford will not deliver as expected.	Bigsby Road in Retford should be considered as an alternative allocation to add to the supply and provide flexibility in the delivery of housing in an attractive housing market within the District.	to assess sites and their suitability to address the district's housing need. The identification of the green gap has been informed by an independent report on local landscape quality and the historic environment towards the south of Retford. The identification of Green Gaps are not designed to prevent the overall development requirement from being met. 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 Inspector of the Bigsby Road appeal relating to highway constraints can be addressed to the satisfaction

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name:					
					of the Local Highways Authority.
Representation Reference: SA-REF014.4 Name: Marrons Planning on behalf of Vistry Group	Refers to: POLICY ST15 - Provision of Land for Housing	Legal compliance and soundness: Legal compliance and compliance with the Duty to Cooperate not indicated. Plan is unsound.	Comments: There are further deliverable, suitable and sustainable options for allocation at Retford, including Site LAA071, which could support achievement of the BLP's wider strategic objectives (including 25% affordable housing), also minimising the need for less sustainably located allocations and those affected by flooding. The SA and Site Selection Paper are out-of-date and inconsistent with the up-to-date Land Availability Assessment (LAA, May 2022).	Suggested changes: Allocate LAA071 for approximately 120 homes, supporting green spaces and infrastructure as a logical 'Phase 2' to the adjoining Linden Homes scheme which is already under construction.	Officer comments: It is considered that the Land Availability Assessment, Sustainability Appraisal and Site Selection Methodology provide an up to date, appropriate basis to assess sites and their suitability to address the district's housing need.
Representation Reference: SA-NRF020 .3 Name: Rotherham Metropolitan Borough Council	Refers to: POLICY ST15: Provision of Land for Housing	Legal compliance and soundness: Not specified	Comments: The increase of affordable housing provision to 20% on brownfield sites is welcomed.	Suggested changes: None	Officer comments: Support noted

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name:					
Representation Reference: SA-REF018.6 Name: Spawforths on behalf of Albermarle Homes	Refers to: POLICY ST15: Provision of Land for Housing	Legal compliance and soundness: Plan is not legally compliant, does not comply with the Duty to Cooperate and is unsound.	Comments: Objects that their site at Blyth Road, Blyth/Harworth is not allocated for housing in the Local Plan Addendum. The only changes to Policy ST15 is to remove the 4,000 home Garden Village of which circa 590 dwellings from this Local Plan period. There are no suggested remedies to this reduction in new housing allocations.	Suggested changes: Allocate Albermarle Homes' site at Blyth Road, Blyth/Harworth for housing.	Officer comments: There is sufficient provision in the supply to meet the identified need. It is considered that the Land Availability Assessment, Sustainability Appraisal and Site Selection Methodology provide an up to date, appropriate basis to assess sites and their suitability to address the district's housing need. As 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 without planning permission. This makes a total provision of 121 dwellings for Blyth. This satisfies the growth requirement.

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name:					
Representation Reference: SA-REF017.2 Name: Heatons on behalf of William Davis Homes	Refers to: POLICY ST15 - Provision for the Housing of Land	Legal compliance and soundness: Plan is not legally compliant and is unsound. Compliance with the Duty to Cooperate - not specified.	Comments: Policy ST15 sets out land for approximately 3,377 new dwellings. The housing completions between 1 April 2020 and 31 March 2022 suggest that the Local Plan has already delivered 12% of the housing required for the lifetime of the Plan, with 35% of those delivered within small rural settlements, a delivery strategy which is at odds with draft Policy ST1 and adopted Core Strategy Policy CS1. It noted that the Core Strategy was adopted in December 2011 and set a yearly housing growth target of 350 houses per annum growth target for the District for the period 2010 to 2028, in order to provide at least a 15-year timeframe for the Site Allocations DPD, which has now been withdrawn. Data published within the Authority Monitoring Report 2020-2021 (August 2021) indicates that the Council first met the annual housing target six years into the adoption of the Core Strategy in 2015/16, at a point where policies within the Local Plan would be out-of-date with the NPPF (2015/16 AMR: 3.4 YHLS). There is considerable risk that the Local Plan will not contain sufficient allocations to deal with any future uplift housing requirements leading to inflated housing delivery and a lack of housing land supply. This would lead to unplanned development that is	Suggested changes: The allocation of the site at Mansfield Road, Worksop, provides an opportunity to secure the residential development of a site which meets the need to deliver 12,551 new dwellings in accordance with a sustainable development strategy.	Officer comments: As the base date for the Local Plan is 2020 completions since 1 April 2020 contribute towards meeting the identified need. 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 housing need identified in the Core Strategy 2011 is now out of date. It is considered that sufficient provision has been made to meet the housing needs of the district in sustainable

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			associated with the significant increase in planning permissions being granted over recent years, which has led to an increase in housing delivery which now makes a significant contribution to the Plan period. Much of the housing delivery over the past two-year period has been within settlements which otherwise would have been earmarked for limited rural growth in accordance with Policy CS8. It is clear that the inclusion of these numbers within the latest local plan period is a reactive response to an out-of-date housing delivery strategy.		locations through a proportionate and balanced distribution through settlement hierarchy. It is considered that the higher housing requirement, committed and proposed allocations will appropriately contribute to meeting housing need. It is considered that the Land Availability Assessment, Sustainability Appraisal and Site Selection Methodology provide an up to date, appropriate basis to assess sites and their suitability to address the district's housing need.
Representation Reference: 2135135.1 Name: District and Nottinghamshire County Councillor	Refers to: POLICY ST15: Provision of Land for Housing	Legal compliance and soundness: Plan is legally compliant, does not comply with the Duty to Cooperate and is unsound.	Comments: The Plan relating to HS13 has been deemed to be Not Sound by Nottinghamshire County Council due to lack of infrastructure provision, inadequacy of plans and lack of integration with other parts of the Local Plan. There are over 1200 homes that will have probably 2000 plus vehicles and these will travel via Ordsall Bridge or Eaton Bridge in to Retford. The suggestion that 25% of people will use public transport is unlikely, particularly as bus services reduce.	Suggested changes: Not being against development if proper infrastructure is provided, there needs to be a road with a bridge over the River Idle from the new development to London Road A638.	Officer comments: It is considered the Local Plan appropriately reflects infrastructure partners views, and identifies necessary infrastructure required to support the delivery of the site allocations in the Local Plan, including for transport, education and health. The Bassetlaw Transport Study

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>Cycle paths are suggested by NCC as inappropriate for the roads suggested. The additional traffic will cause major pinch points and the issues around the village will be exacerbated with more traffic using local facilities like the retail area that has huge problems with parking. HS13 is only allowing for 'space' for a school or health/retail facilities to be provided. Infrastructure such as schools, healthcare and retail needs proper support through developer contributions. It is proposed that zero CIL levy is applied to developers on this and other strategic sites and so any contributions are wholly reliant on S106 contributions which are often not delivered in full. Despite many objections from the community and local ward council members and across the District, these objections have been ignored. Residents have been told at public meetings/consultation events that a Primary School was agreed in writing with Nottinghamshire County Council... this is completely untrue and has been proven to be so. At public consultations, doorstep discussions and letters into households the reason for building over 10,000 homes was said to be because of government housing requirement. This is untrue as the government housing requirement was proven to be 4,896 homes.</p>	<p>Infrastructure such as schools, healthcare and retail needs proper support through developer contributions. It is proposed that zero CIL levy is applied to developers on this and other strategic sites and so any contributions are wholly reliant on S106 contributions which are often not delivered in full.</p>	<p>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 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. To inform public consultations, officers of the County</p>

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
					<p>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. 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 Infrastructure Delivery Plan states that developer contributions are expected to fund the primary school; the cost has been agreed with NCC. Developer contributions will also be sought to mitigate the impacts of development in relation to health care provision. To deliver infrastructure on site and</p>

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
					<p>within the locality through a financially viable scheme, the Whole Plan Viability Assessment consider that the site should be CIL exempt. This is considered to be consistent with national policy. All comments made at each consultation stage have been responded to and where appropriate have informed the next version of the Plan. 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.</p>

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Representation Reference: SA-REF016.1 Name: Planning Issues on behalf of Churchill Retirement	Refers to: POLICY ST29 - Affordable Housing	Legal compliance and soundness: Plan is legally compliant and complies with the Duty to Cooperate. Soundness not specified.	Comments: Churchill Retirement Living is an independent housebuilder specialising in retirement living housing for older people. The Local Plan is one of an alarmingly limited number of emerging Local Plans that have set a differential affordable housing rate, with a 20% affordable housing requirement for brownfield sites and a 25% requirement for greenfield sites. This is highly commendable and suggests a greater focus on viability at the Plan making stage. The affordable housing targets detailed in the above policy are informed by the Viability Study undertaken in April 2022. Note that no viability appraisals were undertaken for specialist older persons' housing typologies – namely Sheltered Housing and Extra Care accommodation. This is disappointing and considered to be contrary to best practice and the typology approach detailed in Paragraph: 004 (Reference ID: 10-004-20190509) of the PPG which states that. "A typology approach is a process plan makers can follow to ensure that they are creating realistic, deliverable policies based on the type of sites that are likely to come forward for development over the plan period. The Bassetlaw Housing and Economic Development Needs Assessment (2020) and Policy ST31 of the Local Plan details a requirement for 3,000 units of specialist older	Suggested changes: It would be more appropriate to set a lower, potentially nil, affordable housing target for sheltered and extra care development, particularly in urban areas. Recommend an addition to Policy ST29: Affordable Housing: 3) Contributions will not be sought from self-build, custom housebuilding developments or specialist older persons' housing including sheltered and extra care accommodation. 6. Exceptions to the requirement for on-site provision will be: b) Specialist accommodation in Class C2 where the management of the building(s) would make it difficult to provide affordable housing on-site (such as sheltered accommodation);	Officer comments: National planning practice guidance says evidence may wish to consider different policy requirements, it does not require the Plan to do so. There are many different types of specialist housing products, with different levels of care associated. It is considered criterion 9 provides sufficient flexibility should site-specific viability be a concern. However it is considered that a proposed suggested change to Policy ST29 6b) will clarify the approach to be taken to commuted sums: Exceptions to the requirement for on-site provision will be: b) Specialist accommodation in Class C2 where it can be

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>persons' housing (and a further 603 care home spaces) over the Plan period, and unless action is urgently taken the Council will struggle to address this need. It is therefore clear that viable sites bringing these forms over development forward will be required over the Plan period. Note that the viability appraisal results (pages 38 -40) for residential development show that apartment developments are unviable with the lowest requirement of affordable housing tested: a 10% affordable housing and s106 contributions of £1,750 per dwelling. Brownfield sites are less viable than greenfield sites. The viability of specialist older persons' housing is more finely balanced than that of 'conventional' apartments: -Build costs for are higher for supported housing, with the most recent BCIS build costs rebased to Bassetlaw 20% higher than estate housing and 5% higher than flats. - Communal floorspace accounts for between 25% - 35% of the Gross Internal Area compared to 15% for flats and 0% for houses. -Sales rates for older persons' housing are currently under 1 unit per month with the nearest retirement living scheme, Eliot Lodge in Ashbourne, selling at a rate of 0.7 units per month. While specialist housing can achieve an uplift on sales values</p>		<p>demonstrated that the management of the building(s) would make it difficult to provide affordable housing on-site (such as sheltered or extra care accommodation);</p>

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>compared to 'conventional' apartments, this uplift is less pronounced in lower value areas. The viability appraisal show that flatted developments, which would include retirement living and extra care apartments are unviable in the authority. This would reflect our experience who have struggled to bring forward specialist housing within Bassetlaw historically. It would be more appropriate to set a nil affordable housing target for sheltered and extra care development, at least in urban areas. This accords with the PPG which states that 'Different (affordable housing) requirements may be set for different types or location of site or types of development' (Paragraph: 001 Reference ID: 10-001-20190509). Paragraph 5.33 of Policy HP5: Provision of Affordable Housing in the emerging Fareham Borough Local Plan which advises that: ... 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. A nil affordable housing rate could facilitate a step-change in the delivery of older person's housing in the District, helping to meet the diverse housing needs of the elderly as detailed in Policy ST31: Specialist Housing. The benefits of specialist older persons' housing extend</p>		

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			beyond the delivery of planning obligations as these forms of development contribute to the regeneration of town centres and assist Council's by making savings on health and social care. Note and commend the Council for recognising the difficulties in providing mixed tenures 'in block' within specialist accommodation in sub-clause 6 b) of the supporting text to Policy: ST29. Supported and specialist accommodation can fall within either Use Class C3 or C2 due to the varying level of facilities and care provided on-site. Sheltered housing, as is referenced in the wording of the policy, can sit within Use Class C3. To avoid confusion, we would recommend the omission of 'Use Class C2' from the wording of this paragraph.		
Representation Reference: SA-NRF011.3 Name: Resident	Refers to: POLICY ST29: Affordable Housing	Legal compliance and soundness: Legal compliance, soundness and compliance to the Duty to Cooperate not specified.	Comments: There does not seem to be many bungalows being built on these new developments. This was mentioned several times during the meetings about the Carlton Local Plan. Many people there said they lived in four or five bedroom houses in which they had raised their families but now their children had grown up and moved out, that they would like to downsize to a bungalow but did not want to leave Carlton. They were assured that the developments would contain bungalows but it	Suggested changes: None.	Officer comments: Policy ST30 requires that developers provide for an appropriate housing mix on each site to reflect identified needs in the Council's Housing Needs Assessment. The detailed housing mix is agreed at planning application stage; however the Local Plan is

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			seems there will only be about a dozen or so in a development of hundreds. Have a relative who lived in a house in Kilton. Due to mobility issues she and her husband wanted to move to a bungalow still within Worksop. Every Estate Agent told her that bungalows were very much sought after and that there were not enough to meet demand. If more bungalows were built then this would free up some larger family homes so not as many would need to be built. Do the Council talk to local Estate Agents to find out what properties are in demand in which areas when making planning decisions.		supportive of level access accommodation and bungalows. Work on the Housing Needs Assessment involved discussing proposals with local estate agents and property market consultants.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Representation Reference: SA-NRF023.1 Name: Savills on behalf of land owners S Williams	Refers to: Policy ST32: Provision for Gypsy and Travellers	Legal compliance and soundness: Not specified	Comments: Welcome the amendments to draft Policy ST32, relating to Gypsy sites and further support the removal of draft allocation ref: GT00, land at Elkesley.	Suggested changes: None	Officer comments: Noted.
Representation Reference: SA-NRF020 .4 Name: Rotherham Metropolitan Borough Council	Refers to: POLICY ST32: Sites for Gypsies and Travellers	Legal compliance and soundness: Not specified	Comments: Acknowledge the site GT006: Land at Elkesley (for 9 additional pitches) is now withdrawn from the allocation. The intention that all provision would be met through existing sites and/or extension/intensification and/or formalisation of other sites, is noted.	Suggested changes: None	Officer comments: Noted.

Local Character and Distinctiveness

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Representation Reference: SA-REF001.1 Name: Axis on behalf of FCC Environment Limited	Refers to: POLICY ST40 and 40A - Biodiversity and Geodiversity – Policies Map	Legal compliance and soundness: Plan is legally compliant and complies with the Duty to Cooperate. Plan is unsound.	Comments: Previous representations have sought to remove the Local Wildlife Site (LWS) designation which was identified across the site. The latest officer comments stated that the designation could only be removed by the Nottingham Biological and Geological Records Centre. Dialogue between landowner and the Nottingham Biological and Geological Records Centre (attached) has confirmed that the records centre have removed the LWS designation from their records and mapping. On this basis the site is not designated, and the Policies Map should also be amended.	Suggested changes: Map should also be amended to reflect this.	Officer comments: The Policies Map was amended in response to the January 2022 Addendum by removing the Local Wildlife Site designation in response to the Nottingham Biological and Geological Records Centre instructions.
Representation Reference: SA-REF002.2 Name: Natural England	Refers to: POLICY ST40 and 40A - Biodiversity and Geodiversity – Paragraphs 8.6.10 to 8.6.12	Legal compliance and soundness: Plan is legally compliant and sound. Plan complies with the Duty to Cooperate.	Comments: Support the amendments in paragraphs 8.6.10 – 8.6.12 which make changes associated with the withdrawal of the Bassetlaw Garden Village and potential recreational impact. Agree that any housing development that falls within the Impact Risk Zone (IRZ) for Clumber Park SSSI should give full consideration to the potential recreational impact on the SSSI when developing proposals and include appropriate mitigation measures. Will continue to work with the Council and other interested organisations to	Suggested changes: None.	Officer comments: Noted

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			understand and monitor recreational impact of future development on designated nature conservation sites in Sherwood Forest.		
Representation Reference: SA-REF012.3 Name: National Trust	Refers to: POLICY ST40 and 40A - Biodiversity and Geodiversity – Supporting text Paragraphs 8.6.10-8.6.11	Legal compliance and soundness: Legal compliance and compliance with the Duty to Cooperate not specified. Plan is unsound.	Comments: The Plan continues to promote a very high level of new housing development, with a total supply of 12,551 dwellings. Despite the removal of the Garden Village, this represents an increase from the 12,198 dwellings referred to in the original Pre-Submission consultation. It is unclear why, at paragraph 8.6.10 the need to mitigate recreational impacts on Clumber Park would fail to justify a strategic solution following removal of the Garden Village. The Clumber Park SSSI Recreational Impact Assessment March 2022 notes that a large amount of proposed development within the Bassetlaw Local Plan and Newark and Sherwood Local Plan is within 7.5km of the Clumber Park SSSI boundary, stating that: “In the absence of mitigation, it is predicted that there will be an increase in visitor use of 55% within the SSSI compared to current use (i.e. at the time of survey) as a result of the increase in dwellings from the allocations in the Bassetlaw and Newark and Sherwood Local Plans.” 9% of this	Suggested changes: <ul style="list-style-type: none"> • Reconsider the evidence in relation to potential recreational impacts on Clumber Park SSSI and Sherwood Forest ppSPA and reinstate a strategic solution for mitigation. • Any supporting text that is intended to reflect a policy requirement needs to be translated into Policy ST40. Clarify what is meant by an ‘Impact Risk Zone’, whether any site allocations are likely to fall within one and what effect this policy might have in practice. 	Officer comments: Natural England stated that the proposed strategic solution could not be justified; this is further evidenced through the Statement of Common Ground with Natural England (May 2022) and the Recreation Impact Technical Note (July 2022). However, it is acknowledged that the approach to be taken to establishing the potential recreation impact on all SSSIs should be clarified. It is considered a proposed suggested change to Policy ST40 will address the matter as new criterion 1d): Proposals of 50 dwellings or more (which includes piecemeal planning applications for less than 50 dwellings for the site) that fall within an ‘Impact Risk Zone’ of a SSSI will be required to give appropriate consideration to the impact from the development

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>increase was attributed to the Garden Village, with 46% therefore being attributed to other sites. The study goes on to suggest a 24.7km zone of influence around Clumber Park. This brings into question the adequacy of Policy ST40. Concerned about the wholesale removal of Policy ST40A from the plan. The supporting text at 8.6.11 suggests that the policy will be replaced with a requirement that any sites falling within an 'Impact Risk Zone' of an SSSI 'give appropriate consideration to that SSSI' when developing proposals, with potential for mitigation to be required in certain circumstances although only on-site mitigation is referred to. This requirement has not been carried forward into Policy ST40, nor is it clear how it would be implemented. The Habitats Regulations Assessment treats this as a policy requirement, but then goes on to state that: "However, none of the proposed allocations lie within a relevant Impact Risk Zone (that is, where residential development is identified as a risk) for any of the SSSIs that overlap with the ppSPA".</p>		<p>upon the integrity of the SSSI, including recreational impact, in developing proposals for the site. Where relevant, appropriate mitigation measures will be sought, which may include an appropriate design and layout to protect the integrity of the SSSI. Additionally, and for consistency with new criterion 1d) a proposed suggested change is proposed to paragraph 8.6.11 as: On that basis, Policy ST40 identifies that all housing sites of 50 or more dwellings that fall within an 'Impact Risk Zone' of a SSSI will be required to give appropriate consideration, in particular relating to the potential recreational impact from the proposal upon that SSSI when developing proposals. Where relevant appropriate mitigation measures will be sought, which may include an appropriate design and layout to protect the integrity of the SSSI. Schemes that propose a lower site threshold to circumvent the</p>

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
					policy requirement will be resisted.
Representation Reference: SA-NRF020 .5 Name: Rotherham Metropolitan Borough Council	Refers to: POLICY ST40: Biodiversity and Geodiversity	Legal compliance and soundness: Not specified	Comments: Acknowledge the changes to paras 8.6.7 - 8.6.12 that clarify the omission of Policy ST40A and the actions to be taken in relation to development within an 'Impact Risk Zone' of a SSSI, Birklands and Bilhaugh SAC and Sherwood Forest ppSPA.	Suggested changes: None	Officer comments: Noted

Infrastructure and Delivery

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name:					
Representation Reference: SA-NRF010.1 Name: Environment Agency	Refers to: POLICY ST56 - Safeguarded Land – Supporting text paragraph 12.1.1	Legal compliance and soundness: Legal compliance, soundness and compliance to the Duty to Cooperate not indicated.	Comments: Note that additional wording is included here referencing the safeguarded land in respect of a future Worksop Flood Management Scheme.	Suggested changes: Ask that the wording is amended to say ‘and land to facilitate <i>for a potential emerging</i> Worksop Flood Management Scheme’ to highlight that at this early stage there is no certainty that a scheme will be undertaken, or if one is brought forward, what a scheme would look like.	Officer comments: It is considered that a proposed suggested change to Paragraph 12.1.1 would clarify the approach: This Local Plan identifies a number of areas of land that provide the opportunity for the provision of new highways infrastructure and land to facilitate the emerging Worksop Flood Management Scheme over the lifetime of the plan, and into the next plan period, enabling Bassetlaw to more easily transition into a more sustainable District in the future. An additional proposed suggested change to Policy ST56 1c) is required for consistency: land between Shireoaks and Worksop to accommodate water

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
					storage as part of the wider emerging Worksop Flood Management Scheme in accordance with Policy ST52.

Evidence Base

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Representation Reference: SA-REF001.2 Name: Axis on behalf of FCC Environment Limited	Refers to: Site Selection Methodology, May 2022	Legal compliance and soundness: Plan is legally compliant and complies with the Duty to Cooperate. Plan is unsound.	Comments: The full previous representation is enclosed for ease of reference, these relate to: although the Site Section Methodology has been updated (May 2022), its recommendations still do not appear to appear to have been given any further consideration within the emerging Local Plan. There is no justification as to why the site has been rejected or treated differently to the neighbouring land to the south. Part of the site now benefits from Reserved Matters and the relevant conditions have been discharged, which enables employment units to be constructed on part of the site. It is still contested that the entire site should be allocated for employment uses, especially as it is not a designated wildlife site and employment uses have been found acceptable.	Suggested changes: The draft Local Plan is not sound because it is not justified. Planning policy should provide support for economic development which brings forward significant, good quality inward investment opportunities to Worksop, which is the focus for development. As drafted the emerging Local Plan fails to maximise this by not allocating the site.	Officer comments: EES07 to the south is an established, operational employment site, with the site benefitting from planning permission to extend that use. Policy ST10 seeks to protect existing operational employment sites not all sites with planning permission for employment use. It is considered that the Land Availability Assessment, Sustainability Appraisal and Site Selection Methodology provide an appropriate basis to assess sites and their suitability to address the district's employment need. To clarify the approach taken by policy ST10, a minor modification is prosed to the supporting text of the policy.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Representation Reference: SA-REF004.2 Name: Pegasus Group on behalf of Barratt Homes	Refers to: HEDNA 2022	Legal compliance and soundness: Plan is legally compliant and complies with the Duty to Cooperate. Plan is unsound.	Comments: To ensure that the plan is sustainable it is important that employment and housing strategies are aligned. This will ensure that the economic potential of the area is met in a sustainable manner by optimising the potential to reduce commuting in and out of the area. The derivation of the amended housing requirement is set out within the Bassetlaw Housing & Economic Needs Assessment: Addendum. It is understood that this report provides a focused update to the 2020 HEDNA. Table 2.3 of the HEDNA 2022 identifies that additional plan period (2020 to 2038) jobs are likely to fall within the range 9,852 and 11,354 jobs. The 2022 HEDNA converts this jobs range into the housing requirement using three main assumptions, these being: double-jobbing, community ratio and claimant count. The key difference between the 2020 HEDNA and 2022 HEDNA is understood to relate to the claimant count. The 2022 HEDNA Figure 1.3 of Appendix A identifies the large spike in the claimant count which occurred in quarter 1 of 2020. This is to be expected given the economic impact of the first 'lockdown' due to the Covid-19 pandemic. This impact was not modelled in the 2020 HEDNA but it was noted that: "...unemployment will have increased in 2020	Suggested changes: <ul style="list-style-type: none"> Based upon our assessment the reduction in the economic-led housing need figure is unjustified and should as a minimum be retained at the level identified in the previous iteration of the plan. Argue that given the increase in potential job creation there is a justified argument to increase the housing requirement. recommended that the development boundaries are relaxed. As a minimum this should include the identified commitments e.g. within Langold they should include the red-line boundary of application reference 15/01605/OUT. To enable the delivery of windfalls they should be greater in scope. 	Officer comments: It is considered the HEDNA Addendum 2022 is consistent with national policy, appropriately considers the impacts of Covid and provides a robust basis by which to determine the jobs growth and housing requirement for the plan period. The Development Boundaries Background Paper explains the approach taken to development boundaries. The housing commitment is allocated by the Langold Neighbourhood Plan which forms part of the development plan for the district and the development boundary reflects that defined by the neighbourhood plan. It is considered the allocation provides a sufficient supportive framework should the permission be delayed.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			<p>due to COVID 19, with August 2020 claimant count at 5.3% albeit lower than the national average of 6.5%. The Office for Budget Responsibility's central COVID scenario indicates around 4 year to return to near pre COVID unemployment levels" (2020 HEDNA, paragraph 5.4). Despite this the 2020 HEDNA concluded in relation to unemployment that no changes to the number of people who are unemployed moving forward to 2037. In contrast the 2022 HEDNA adjusts the housing need calculation based upon the fact that: "...1,870 people not working in 2020 who might be expected to return to employment in the future (taken to be over the period to 2038 for consistency with other analysis in this report)." (paragraph 3.14). The impact of the pandemic was known at the time of the 2020 HEDNA and as can be seen in figure 1.3 of the 2022 HEDNA the recovery to date has been swift. The recovery in many of these jobs are likely to be in the trades and hospitality sectors which were hard hit during the early part of the pandemic. These types of business are now re-opening and seeking employees. It has recently been reported that UK unemployment edged down to 3.7% in quarter 1 2022. This is the lowest reading since 1974 with fewer unemployed people than job vacancies. It appears that the</p>	<ul style="list-style-type: none"> • Should consider the inclusion of additional allocations and / or reserve sites. Reserve sites could be held in abeyance until required either due to a failure to meet the housing requirement or other unforeseen issues. This would assist in ensuring that the Local Plan met its housing requirement as a minimum. Parcels B and C, as identified on figure 1 would provide an ideal location adjacent an existing commitment for either an allocation or reserve site. 	

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			2022 HEDNA is pessimistic in terms of the ability of those unemployed during the pandemic to get suitable work in those sectors within which they previously worked. Given these recent changes it is considered that the discount applied to the housing requirement on the basis of those unemployed is unjustified and effectively dampens the economic-led housing need figure. It is noted that if the commuting ratio were to be held constant to that most seen in the census then the economic led housing need would be 590dpa, approximately the same as that within the previous iteration of the submitted plan.		
Representation Reference: 2135135.2 Name: District and Nottinghamshire County Councillor	Refers to: Bassetlaw District Council Whole Plan & Community Infrastructure Levy Viability Assessment April 2022 – Paragraph 1.21	Legal compliance and soundness: Plan is legally compliant and complies with the Duty to Cooperate. Plan is unsound.	Comments: Suggest the funding gap is £52 Million with S106 contributions reducing the gap to at least £19M. This requires all the S106 contributions to be received. NCC suggest a funding gap of £89 Million. This is roughly equivalent to the annual council tax contributions of 65,000 properties, which is roughly the amount of properties in Bassetlaw. As BDC receive only a proportion of council tax paid, circa 8.5%, then £89 M is roughly equivalent to a loss of all council tax revenue for 12 years. It is unclear why developers are not being required to contribute in any reasonable way through CIL.	Suggested changes: Developers need to contribute fairly and reasonably to the local infrastructure needs of this plan.	Officer comments: The planning system identifies different mechanisms to secure infrastructure considered necessary to mitigate the impacts from development. This includes planning obligations, CIL and/or planning conditions. National policy does not favour any mechanism. When proposing a levy, national guidance requires the local authority to

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
					consider how the rate will impact the viability and therefore the deliverability of development across the area. On that basis, and to achieve an appropriate balance, as required by national guidance the Whole Plan Viability Assessment 2022 identifies the CIL levy and approach to strategic sites. Infrastructure identified by site-specific policies will be sought, where appropriate by the most appropriate mechanism. It is considered that the IDP 2022 provides an up to date position with regard to the funding gap, anticipated developer contributions and CIL contributions from Local Plan growth, consistent with national policy.
Representation Reference: 2135135.3	Refers to: Infrastructure Delivery Plan Update April	Legal compliance and soundness:	Comments: 7.5 details the funding gaps as suggested by BDC of £52M which may reduce to 'at least' £19M if all S106 contributions are received,	Suggested changes: Infrastructure delivery seems to be an	Officer comments: It is considered that the IDP 2022 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
Name: District and Nottinghamshire County Councillor	2022 – Paragraphs 7.5 and 7.7.	Plan is legally compliant and complies with the Duty to Cooperate. Plan is unsound.	which seems unlikely. NCC state in their formal response to BDC that they object to the CIL proposals and that the funding gap is £89M. 7.7 states that BDC have not received a cost for a 1.5 form entry primary school. This is not true it has been put to BDC that the cost is £4.9M and 'must be funded in its entirety by the developer' this formal response was sent by NCC planning group to BDC in second half of 2021 and the communications are available. NCC state in a number of communications that the different elements of the local plan lack cohesion and integration. There appears to be a jigsaw piece approach with little consideration on the impact and combined impact of the elements of the plan on each other or the district as a whole.	afterthought which could have been improved upon with proper consultation with the county council at an early stage rather than wait until there are observations that the Local Plan is unsound and they have objections from the County Council. BDC need to heed what is being suggested to them by NCC. Not against development if proper infrastructure is provided, there needs to be a road with a bridge over the River Idle from the new development to London Road A638. Infrastructure such as schools, healthcare and retail needs proper support through developer contributions. At the moment it is proposed that zero CIL levy is applied to developers on this and other strategic sites and so	funding gap, anticipated developer contributions and CIL contributions from Local Plan growth, consistent with national policy. Para 7.7 does not say that BDC has not received a cost for the primary school. NCC have provided the cost and this is identified in the IDP. Developer contributions from Ordsall South have been identified by the IDP as necessary to deliver the primary school but the scheme is expected to be delivered over two plan periods. Para 7.7 clarifies how the IDP has apportioned developer contributions for dwellings expected to be completed in this plan period; and also confirms that this position will be re-visited should NCC indicate that the school is needed earlier than currently envisaged. It is the cost of the secondary satellite

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
				any contributions are wholly reliant on S106 contributions which are often not delivered in full.	school that is being discussed with NCC at this time (para 7.7 refers). The Local Plan states that a range of mechanisms will be used to deliver infrastructure; this is considered to be appropriate and consistent with national legislation and national policy. 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 considered that this provides an appropriate evidence base and approach to identify the

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
					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.
Representation Reference: SA-NRF017.3 Name: Nottinghamshire County Council	Refers to: Bassetlaw Transport Study May 2022	Legal compliance and soundness: Legal compliance, compliance with the Duty to Cooperate and soundness not specified.	Comments: The County Council made representations to the original Local Plan publication with regard to highway and transport matters. Since that period considerable progress has been made with regard to agreement over the Bassetlaw Transport Study and the proposals to carry out a study to investigate, plan for and implement improvements to the A57 made necessary by the proposals in the Local Plan.	Suggested changes: None.	Officer comments: Noted.
Representation Reference: SA-NRF017.4 Name: Nottinghamshire County Council	Refers to: Retford Transport Study May 2022	Legal compliance and soundness: Legal compliance, compliance	Comments: An amended Retford Transport Assessment has been submitted to the County Council which principally looks at the impacts of the Ordsall South allocation. The County Council will respond on this document very shortly. Will	Suggested changes: None.	Officer comments: Noted.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
		with the Duty to Cooperate and soundness not specified.	also respond to an amended Worksop Transport Assessment when it is submitted.		
Representation Reference: SA-NRF015.4 Name: Resident	Refers to: Sustainability Appraisal	Legal compliance and soundness: Not specified.	Comments: The Sustainability Report consistently rates the proposed settlement hierarchy highly (POLICY ST1) whilst failing to recognise that without the previous cluster model or enhanced Rural Service Centre status; villages with latent demand like Everton, will remain reliant on passing trade for our pubs and school. Without meaningful housing allocations, the additional services won't come. At 5.1.5 the word "sustainably" is highlighted in yellow as a means to question whether the larger settlements in the Bassetlaw Hierarchy can expand appropriately? Everton can certainly expand sustainably – on the south side of the A631 – with space for doctors surgery, dentist, PO and retail to add to the existing 2 x pubs, successful school, excellent transport links, 2 x cafes/Farm Shop, village hall, fantastic sporting facilities and offices. Indeed, Everton is the only Bassetlaw A631 settlement not to have been by-passed – because the business community at that time would not allow it.	Suggested Changes: None	Officer Comments: Section 4.2 of the 2022 SA Second Addendum report assesses 8 spatial options. It is considered that these appropriately assess the alternative spatial options available in the District, including for the rural area.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Representation Reference: SA-REF011.4 Name: Barton Willmore now Stantec on behalf of Caddick Developments Ltd	Refers to: Bassetlaw Housing & Economic Needs Assessment: Addendum April 2022	Legal compliance and soundness: Plan is legally compliant and complies with the Duty to Cooperate. Plan is unsound.	Comments: No comments on the addendum assessment methodology in terms of setting housing and employment needs. It is relevant in terms of employment land need that there is significant demand and a lack of supply for employment space through the UK, particularly the East Midlands and Yorkshire, Humber & the North East (this site can serve both markets). The supply and demand position are picked up in the councils logistics assessment (as below). The Housing & Economic Needs Assessment Addendum reconfirms the need for Apleyhead in terms of wider employment land supply as, following the updated employment land supply position shown in the addendum assessment there is a small shortfall in supply. Paragraphs 2.3 and 2.4 of the addendum state: 'In order to consider the employment required to support deliveries in the 2020-38 period, the supply has been assessed. Appendix A of the 2020 HEDNA identified the Bassetlaw employment land supply position for 2020-37 and resulting anticipated full time equivalent jobs arising. This has been updated based on: • Removal of the Garden Village and associated employment provision • Removal of Marnham employment site • Inclusion of Bevercotes Colliery permission in supply. This updates the supply	Suggested changes: None.	Officer comments: The HEDNA Addendum 2022 identifies the general employment need to be 196ha, with a buffer in employment terms of 10% built in to provide flexibility moving forward. Apleyhead is being promoted by the Local Plan to meet an identified regional need for logistics so is distinct to the need identified.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			position to 189.4ha - which is slightly below the HEDNA requirement of 196.7ha, before considering the Apleyhead Junction strategic site of an additional 118.7ha.' It is evident that without Apleyhead Junction there is likely to be a small shortfall in predicated supply based on the addendum report findings. This reinforces the need to ensure the delivery of the Apleyhead site.		
Representation Reference: SA-REF011.5 Name: Barton Willmore now Stantec on behalf of Caddick Developments Ltd	Refers to: A1 Corridor Logistics Assessment: Addendum April 2022	Legal compliance and soundness: Plan is legally compliant and complies with the Duty to Cooperate. Plan is unsound.	Comments: The assessment conclusions are noted and supported: '... the inclusion of the Apleyhead Junction site in the Bassetlaw Local Plan remains appropriate in meeting the wider Property Market Area / sub regional logistics need in the context of planning ahead for at least 15 years and in the context of the very strong demand that continues to be experienced in the logistics market.' Apleyhead is a unique opportunity to deliver a significant development which can meet the widest possible range of occupier requirements from smaller scale to upwards of 4m sqft in a single building. Commissioning further market evidence to update the 'Market and Economic Needs Report' (October 2021) which supported the Publication Plan representations. This will be presented in a planning application as well as at the local plan hearings, and is expected to	Suggested changes: None.	Officer comments: Noted.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			show there remains significant demand for large scale employment uses across the UK and particularly in this area and there is insufficient supply in the form of readily deliverable opportunities.		
Representation Reference: SA-REF011.6 Name: Barton Willmore now Stantec on behalf of Caddick Developments Ltd	Refers to: Whole Plan & Community Infrastructure Levy Viability Assessment April 2022	Legal compliance and soundness: Plan is legally compliant and complies with the Duty to Cooperate. Plan is unsound.	Comments: The Second Addendum includes an updated Whole Plan & Community Infrastructure Levy Viability Assessment (April 2022). The assessment concludes that employment use development cannot reasonably contribute through CIL, and recommends a CIL rate of £0 per sqm. These conclusions are supported, particularly in the context of the Apleyhead Junction site, as the Viability Assessment correctly recognises that sites such as this will have significant upfront costs which have a significant effect on viability. It is critical that the plan, having recognised the challenging viability of such sites, does not then place unnecessary or onerous infrastructure requirements on these developments.	Suggested changes: None.	Officer comments: Noted.
Representation Reference: SA-REF011.7 Name: Barton Willmore now Stantec on behalf	Refers to: Infrastructure Delivery Plan May 2022	Legal compliance and soundness: Plan is legally compliant and complies with	Comments: Does not object to the principle of financial contributions to new infrastructure (in Appendix 2 of the IDP), nor delivering new infrastructure as part of a development. Any contributions must pass the tests set out in Part 122 of the Community Infrastructure Levy	Suggested changes: None.	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

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
of Caddick Developments Ltd		the Duty to Cooperate. Plan is unsound.	Regulations. Further detail is needed on how the costs in the updated IDP have been calculated, noting the draft plan and IDP indicate several allocations (not just this site) may necessitate infrastructure improvements. The IDP is unclear on the total cost of infrastructure works, following the Garden Village being omitted from the plan. For example, the previous IDP (January 2022) at Appendix 2 identified a 'total cost' for each infrastructure item along with an amount that each site may need to contribute (as a 'funding gap'). However, the updated IDP (May 2022) no longer shows a total infrastructure cost, albeit the notes column allows for an approximate calculation. By calculating the cost apportionments from the 'notes' column in the latest IDP it appears the total infrastructure costs are identical in the two IDPs (January and May). As the Garden Village is now omitted it is reasonable to conclude the plan results in a lesser infrastructure burden (even accepting the Garden Village was only likely to deliver a limited number of units in the plan period). Would anticipate the overall cost of infrastructure and infrastructure close to a Garden Village (e.g., A57/A1/A614 roundabout) would reduce if the site were no longer progressed. The IDP indicates the potential for		proportionate contribution towards mitigation to address impacts upon the highways network. This is considered to be robust up to date transport evidence to justify the approach taken by the IDP. It is considered that the IDP 2022 provides an up to date robust position with regard to the funding gap and infrastructure costs, consistent with national policy.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			significant s106 costs (of some £11.25m) for highway infrastructure alone of which some £3.2m is towards junction improvements on the A57 / A60 / A619 to the west and north west of Worksop. Question the necessity for such significant works resulting from Apleyhead given the likely vehicle patterns and trip distribution generated by development at Apleyhead is predominantly directed to the A1 which lies immediately to the east (being one of the site's major advantages for employment use). The viability assessment recognises the challenges associated with delivering major sites in this area and the infrastructure requirements must be set appropriately. Overall infrastructure requirements will be discussed with the council in due course and can be agreed through a future planning application.		
Representation Reference: SA-REF017.3 Name: Heatons on behalf of William Davis Homes	Refers to: Sustainability Appraisal, 2022	Legal compliance and soundness: Plan is not legally compliant and is unsound.	Comments: A detailed appraisal of LAA549 is absent from the updated SA, instead an assessment is given on the wider LAA206. A major contributor to the site being discounted is significant negative effect arising the proximity of Grade I Listed Building, Worksop Manor Lodge, Worksop Manor Lodge and Grade II listed barn and stable at Lodge Farm, all of which are located to the north of the site and at a significant	Suggested changes: It is considered more appropriate to afford the site at least a neutral effect likely in this regard.	Officer comments: The area of land that is appraised reflects the options identified as reasonable alternatives by the site selection process. It is considered that effects on heritage, landscape etc. have been identified consistently for all sites based on the

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
		Compliance with the Duty to Cooperate not specified.	distance from what would be the northern boundary of LAA549. The findings of the SA are inconsistent with the Council's judgement given as part of the previous Outline application on the site (17/01356/OUT) which found that there would be a less than substantial harm to listed buildings and, in line with Paragraph 202 of the NPPF, this harm should be weighed against public benefit of delivering a residential development in a sustainable location. An assessment of LAA549 is justified by the site is considered the only site within those assessed to score an uncertain likely effect, yet given a significant negative effect, in the SA12 criteria, Resource Use and Waste. The Nottinghamshire Minerals Local Plan (March 2021) SP7 Minerals Safeguarding prevents the sterilisation of mineral resources, and the County Council accept that the mineral concern may no longer be of any value or potential value. It is understood that part of the site falls within a Limestone safeguarding zone which sits below the northern edge of the site, there is no evidence to show the full extent of the resource in the locality and there's also uncertainty that, should such mineral exist, that this has any existing or future commercial value. Any such resource is highly unlikely to be worked due to other constraints including the proximity to		criteria set out in Appendix 5 of the SA report.

Representation Reference: Name:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
			Manor Lodge (Grade I Listed) and the St Anne's residential estate. It is also of note that Nottinghamshire County Council raised no objections to the development proposed under outline planning application reference 17/01356/OUT.		

Housing Trajectory

Representation Reference:	Refers to:	Legal compliance and soundness:	Comments:	Suggested changes by consultee:	Officer Comments
Name:					
Representation Reference: SA-NRF005.2 Name: GPS Planning on behalf of Brooke Planning Consultancy Ltd	Refers to: Housing Trajectory	Legal compliance and soundness: Plan is unsound. Legal compliance and compliance with Duty to Cooperate not indicated.	Comments: It appears that the housing trajectory set out in appendix 3 has simply been replicated in the latest Second Addendum version which for Misterton listed four sites. It is suggested these could deliver at least 134 dwellings, yet the allocations made in the Neighbourhood Plan include allocations at five sites to deliver up to 187 dwellings, those being: Policy 6: NP01 Land off Haxey Road - 50 Policy 7: NP02 Land off Church Street - 12 Policy 8: NP06 Land off Meadow Drive - 17 Policy 9: NP11 Land off Grange Walk - 60 Policy 10: NP12 Land off Fox Covert Lane - 48 Total 187 Neighbourhood Plan Policy site 7 NP02 Land off Church Street which makes an allocation for up to 12 new homes is missing. The emerging housing trajectory is for 194 dwellings in Misterton so taking into account all the Neighbourhood Plan allocations of up to and including 187 dwellings, leaves land for at least seven dwellings. The 194 dwellings for Misterton will need to go up further if the increased overall figure of 1,535 dwellings across all LRCs in the latest addendum is to be achieved. Question why the Growth Requirement rates for the LRCs under Policy ST2 and the housing trajectory appendix has not been amended.	Suggested changes: Further land needs to be allocated for housing to meet the expected minimum housing delivery rates envisaged at Misterton. As the development boundary has been tightly drawn, further land on the edge of the settlement needs to be allocated. Land fronting Grovewood Road between the Primary school and Gravelholes Lane represents a logical parcel of land to deliver the increased housing required at Misterton.	Officer comments: The overall growth figure of 1,535 for the Large Rural Settlements includes: completions since the 1 April 2020; Existing commitments with planning permission; Allocations without the benefit of planning permission in made neighbourhood plans; and a New allocation at Ollerton Road, Tuxford for 75 dwellings. There are no other new proposed allocations in the Large Rural Settlements. NP02 Land off Church Street gained planning permission for 4 dwellings (19/00795/OUT) and is included as an existing commitment within the small sites category in the trajectory. The Misterton Neighbourhood Plan is currently under review. It will be for the community to consider as part of the review process whether the development boundary remains appropriate and whether additional site allocations should be made. An application for 48 dwellings at Land to the North of Fox Covert Lane (Policy 10: NP12) is under consideration.