

# **Bassetlaw District Council Response to Inspectors Matters, Issues and Questions**

**Matter 1a Legal requirements  
Matter 1b Overarching issues**

**4 November 2022**

(Issue 1)

Please note: Where the Council is proposing changes to policies or reasoned justification in the submitted plan these are detailed in the responses as follows:

- Additional and new text proposed underlined
- ~~Deleted text~~ proposed strike through

## **Matter 1a – Legal Compliance**

### **Issue 1: Has the Council complied with the duty to co-operate and other relevant procedural and legal requirements in the preparation of the Local Plan.**

- 1.1 In preparing the plan did the Councils engage constructively, actively and on an on-going basis with neighbouring authorities and other relevant organisations on cross-boundary issues, in respect of the Duty to Co-operate?

[Note: this question concerns the engagement undertaken by the Councils during the preparation of the plan and does not directly relate to the content of the plan and whether or not it is sound which is considered under other Matters]

#### **BDC Response:**

The Council considers that there is clear evidence that it has engaged constructively and actively during the plan-making process with neighbouring authorities and prescribed bodies in accordance with section 33A of the Planning and Compulsory Purchase Act 2004. It is considered that effective and on-going joint working between the Council (a strategic policy-making authority), and relevant bodies has been integral to the production of the Bassetlaw Local Plan 2020-2038: Publication Version Composite, July 2022 [SUB-010]. In particular, joint working has helped to determine where additional infrastructure is necessary, as evidenced within the Bassetlaw Infrastructure Delivery Plan Update, July 2022 [BG-041]. As such, the approach is considered consistent with the NPPF paragraph 26.

In order to demonstrate effective and on-going joint working, the Council has prepared and updated statements of common ground [SCG-001 – SCG-019], documenting the cross-boundary matters and/or strategic matters being addressed and progressed in cooperating to address these. The statements have been produced using the approach set out in the Plan Making Planning Practice Guidance (PPG), (Paragraph 11) and been made publicly available to provide transparency. A full list of statements of common ground can be found here: <https://www.bassetlaw.gov.uk/planning-and-building/the-draft-bassetlaw-local-plan/bassetlaw-local-plan-2020-2037-publication-version-august-2021/bassetlaw-local-plan-2020-2038-examination-library/>

In addition, a Duty to Cooperate Compliance Statement, July 2022 [DTC-006] has been produced which sets out the key strategic planning matters of the Local Plan and demonstrates how the Council has worked with neighbouring authorities and other prescribed bodies through the plan-making process to ensure strategic planning matters have been satisfactorily addressed.

- 1.2 Has the plan been prepared in accordance with the adopted Local Development Scheme (May 2022)?

**BDC Response:**

The Council considers that the Local Plan has been prepared in accordance with the Local Development Scheme (LDS) May 2022 [BG-024]. Appendix 2 [of BG-024] provides the project plan and timetable of work of the Local Plan. The Council considers that the Local Plan prepared and submitted for Examination is compliant with the LDS.

- 1.3 Has consultation on the plan been carried out in accordance with the Council's Statement of Community Involvement (Jan 2020 and June 2021 Update) and the requirements of the 2004 Act (as amended) and the 2012 Regulations?

**BDC Response:**

The Council considers that the Local Plan has been carried out in accordance with the Statement of Community Involvement (SCI) (January 2020 and the June 2021 Update) [BG-008]. The general principles set out in section 2.3 of the SCI [BG-008] have been applied to all of the Local Plan consultations.

Section 19(3) of the 2004 Act requires that authorities must comply with their statement of community involvement when preparing local development documents. The consultation process undertaken throughout the preparation of the Local Plan is set out in the Bassetlaw Consultation Statements [PUB-006], [PUB-017], [PUB-025] and [SUB-012].

The Town and Country Planning (Local Planning (England) Regulations 2012, sets out the definition for general and specific consultation bodies. In addition, these regulations set out how and when the consultation bodies should be invited to make representations. These regulations have been applied to the adopted Statement of Community Involvement [BG-008], and as such the Council considers that consultation has been carried out in accordance with the 2012 Regulations.

During the Coronavirus Pandemic (with restrictions on social distancing and access to public buildings), the methods of consultation outlined in the SCI were at times not possible. The Town and Country Planning (Local Planning, Development Management Procedure, Listed Buildings etc.) (England) (Coronavirus) (Amendment) Regulations 2020 (December 2020 Regulations), removed on a temporary basis, the requirements on local planning authorities to make certain documents available for inspection at premises and to provide hard copies on request.

The legislation permitted the Council to go ahead with Regulation 18 Local Plan consultations in November 2020 [BG-004] and June 2021 [BG-001] provided that documents were made available on the local planning authority's website. Legislation permitted from the 1 January 2022, the January 2020 SCI be brought back into effect. However, to ensure the Regulation 19 stage of the plan-making process was as accessible as possible, the consultation of the Publication Local Plan [PUB-001, PUB-015 and PUB-023] was undertaken in accordance with the January 2020 SCI.

- 1.4 Does the Sustainability Appraisal (SA) provide a comprehensive and robust basis to inform the strategy and contents of the plan, particularly in terms of:

- (a) Its assessment of the likely effects of the plan's policies and allocations?

- (b) Its consideration of reasonable alternatives, including the eight spatial strategy options? Does it capture all reasonable alternative site options put forward in the plan preparation process? Can these be compared on a like for like basis?
- (c) Its explanation of why the preferred strategy and policies were selected?
- (d) Its assessment of the amount of development that would arise as a result of the provisions in the plan?

[Note: This question focusses on the legal compliance of the SA in broad terms. The implications of the SA for the soundness of the plan is considered under other Matters.]

**BDC Response:**

The Council considers that the SA [PUB-024] does provide a comprehensive and robust basis to inform the Local Plan. The SA has been carried out iteratively at each stage of plan-making, with the findings being taken into account by the Council alongside other relevant factors to inform decision making. The initial stages of the SA were carried out in-house by Council officers, and from 2018 onwards to the present, the SA has been carried out by independent consultants (LUC) on behalf of the Council.

The SA has been carried out as an integrated SA and Strategic Environmental Assessment (SEA). In addition to complying with legal requirements, the approach that has been taken within the SA of the Bassetlaw Local Plan is based on current best practice and that within the national Strategic Environmental Assessment and Sustainability Appraisal Planning Practice Guidance, which requires the SA being carried out as an integral part of the plan-making process.

The methodology used for the SA is described in detail in Chapter 2 of the SA report [PUB-024]. Reasonable alternative options for the policies and sites considered for inclusion in the Local Plan were appraised at each stage of plan-making in line with that methodology, making use of clear colour coded symbols to identify likely significant effects, both positive and negative, in line with the SEA Regulations. In relation to site options, a set of specific site assessment criteria was developed and applied in order to ensure consistency in the appraisal of a large number of options – these criteria are set out in Appendix 5 [of PUB-024] along with wider ‘significance criteria’ that were used to inform the identification of significant effects, both positive and negative, likely to result from policy options. Therefore, the appraisal of options (including site options) was consistent and site appraisals can be compared on a like for like basis.

It should also be noted that all site options were initially appraised (see Chapter 5 [of PUB-024]) on the basis of the site boundaries only, and did not take into account any other information that may have been available about specific proposals for each site, or mitigation measures that may be incorporated. This again ensured consistency between the site appraisals, as the same level of information about proposed development and site-specific mitigation was not available for all site options.

The reasonable alternative site options for appraisal were identified by the Council. As explained in Chapter 2 of the SA report [PUB-024], site options were identified through a Call for Sites exercise, with the LAA [BG-030] informing Council decisions about any sites which did not comprise reasonable options for the purposes of the SA. The site

options appraisal work was originally carried out in January 2020 [BG-014] and at each stage of the SA since then, some minor changes have been made to the suite of options, with newly identified options being added and sites that were no longer reasonable options discounted from the SA.

In terms of the spatial strategy options, Chapter 4 of the SA report [PUB-024] details the evolution of these options throughout the plan-making and SA processes. Six spatial strategy options were originally appraised in the SA report for the Initial Draft Local Plan 2016 [BG-023] and a further two were identified and appraised in the SA report for the Part 1 Draft Local Plan (2019) [BG-018]. The detailed appraisal of these eight options is included in Appendix 4 in the final SA report [PUB-024], having been represented in previous iterations of the SA since 2019. The likely effects of the options are presented in a single appraisal matrix which facilitates comparison between the options.

The HEDNA [SS-007] was updated in 2020 and so when preparing the November 2020 Draft Local Plan [BG-004], the Council revisited the housing target options considered previously. The HEDNA [SS-007] considered a range of scenarios using Oxford Economics and Experian Forecasting and provided four scenarios which were driven by the Apleyhead Junction allocation. These scenarios were each associated with a housing need figure, and those options were subject to SA [in BG-004] along with the updated OAN figure. The appraisal had again been carried out on a comparative basis, with the findings presented in Table 4.5 in the SA report [PUB-024].

In terms of the amount of development proposed through the Local Plan, Chapter 4 of the SA [PUB-024] sets out in detail the alternative options that were considered at each stage of the plan-making process. The appraisal of the alternative quantum options is presented in detail in Appendix 4 [PUB-024]. As explained in Chapter 4, at the most recent stages of plan making, four alternative options for the housing target were considered to be appropriate for appraisal, based on the most recent employment evidence. The appraisal of these options was presented alongside the appraisal of the up-to-date standardised OAN figure for completeness.

Clear information about why the preferred policy approaches (including the overall strategy) and site allocations were selected, and why alternatives were rejected, is provided in Appendices 8 and 10 of the SA [PUB-024].

Therefore, the SA is considered to be comprehensive and robust.

- 1.5 Is the Habitats Regulations Assessment (May 2022) adequate and does the plan include all the recommendations identified in the assessment as necessary to ensure compliance with the Habitats Regulations? Is it robust and convincing in its conclusion that the plan will have no likely significant effects on the integrity of any European sites?

**BDC Response:**

The Bassetlaw Habitat Regulations Assessment (May 2022) [PUB-026] was prepared by independent consultants (LUC) on behalf of the Council and built on previous iterations of the HRA [PUB-018], [PUB-007], [BG-012], [BG-015] and [BG-019] and the consultation responses received in relation to those, in particular from Natural England. At each stage, the HRA was carried out in accordance with relevant legislation and guidance and took into account the implications of recent case law including the

Wealden District Council v Secretary of State for Communities and Local Government, Lewes District Council and South Downs National Park Authority (2017), People over Wind, Peter Sweetman v Coillte Teoranta (April 2018), Holohan v An Bord Pleanala judgement (2018), and Coöperatie Mobilisation for the Environment and Vereniging Leefmilieu (Dutch Nitrogen).

The HRA [PUB-026] was carried out in line with the precautionary principle, which means that a conclusion of 'no significant effect' has only been reached where it is considered very unlikely, based on current knowledge and the information available, that a proposal in the Local Plan [SUB-010] would have a significant effect on the integrity of a European site.

The approach taken in the HRA [PUB-026] to the assessment of impacts on the Sherwood Forest 'prospective potential' SPA (ppSPA) reflects this precautionary approach. In line with Natural England guidance, the HRA [PUB-026] assessed impacts on this potential designation, despite it not yet being designated even as potential SPA (pSPA). This work was presented in a 'shadow HRA' included within the HRA [PUB-026], reflecting advice provided by Natural England in its consultation response to the HRA [BG-015] for the Local Plan in January 2020 [BG-006].

The HRA [PUB-026] details where recommendations made in earlier iterations of the HRA have been addressed in the submitted Local Plan [SUB-010]. In particular, the Local Plan now requires project level HRA within certain site allocation policies as recommended earlier in the HRA process.

Natural England was consulted on the HRA at each stage and Appendix D (of [PUB-026]) details the comments received and how they have been addressed in the HRA. In relation to the HRA for the Publication Version Addendum (January 2022) [PUB-015], Natural England stated that it was 'satisfied that the submission of this document ensures that a full assessment of the proposed policies within the Bassetlaw Local Plan has been carried out and the requirements of the Habitat Regulations have been met.'

Therefore, it is considered that the HRA is adequate, robust and convincing in its conclusions.

1.6 Does the plan include policies to address the strategic priorities for the development and use of land in Bassetlaw?

**BDC Response:**

The NPPF paragraph 17, states that the Local Plan 'must include strategic policies to address each local planning authority's priorities for the development and use of land in its area'. Paragraph 20 requires the Plan to make sufficient provision for the matters identified.

Local Plan paragraph 2.3 clearly states that strategic policies are identified by the prefix ST for the key topics of: housing; business and employment; retail, town centres; tourism; heritage; and, community facilities; green/blue infrastructure; climate change, and infrastructure.

As such, the Council consider that the following strategic policies set out 'an overall strategy for the pattern, scale and design quality of places' (as per NPPF, paragraph 20) including for bringing sufficient land forward, at a sufficient rate, to address

objectively assessed needs over the plan period and to allocate sufficient sites to deliver the strategic priorities of the area. Furthermore, the Plan provides an appropriate framework for 15 years from expected adoption [in 2023] to the end of the Plan period [in 2038]', as required by the NPPF (paragraph 22).

- Policy ST1: Bassetlaw's Spatial Strategy
- Policy ST2: Residential Growth in Rural Bassetlaw
- Policy ST5: Worksop Central
- Policy ST6: Cottam Priority Regeneration Area
- Policy ST7: Provision of Land for Employment Development
- Policy ST10: Existing Employment Sites
- Policy ST11: Rural Economic Growth and Economic Growth Outside Employment Areas
- Policy ST12: Visitor Economy
- Policy ST13: Town Centres, Local Centres, Local Shops and Services
- Policy ST14: Management of Town Centres
- Policy ST15: Provision of Land for Housing
- Policy ST29: Affordable Housing
- Policy ST30: Housing Mix
- Policy ST31: Specialist Housing
- Policy ST32: Sites for Gypsies and Travellers
- Policy ST35: Design Quality
- Policy ST37: Landscape Character
- Policy ST38: Green Gaps
- Policy ST39: Green and Blue Infrastructure
- Policy ST40: Biodiversity and Geodiversity
- Policy ST42: The Historic Environment
- Policy ST44: Promoting Healthy, Active Lifestyles
- Policy ST45: Protection and Enhancement of Community Facilities
- Policy ST46: Delivering Quality, Accessible Open Space
- Policy ST47: Promoting Sport and Recreation
- Policy ST50: Reducing Carbon Emissions, Climate Change Mitigation and Adaptation
- Policy ST51: Renewable Energy Generation
- Policy ST52: Flood Risk and Drainage
- Policy ST53: Protecting Water Quality and Management
- Policy ST54: Transport Infrastructure
- Policy ST55: Promoting Sustainable Transport and Active Travel
- Policy ST56: Safeguarded Land
- Policy ST57: Digital Infrastructure
- Policy ST58: Provision and Delivery of Infrastructure

As such, the Local Plan is considered to be compliant with Section 19 (1B-1E) of the Planning and Compulsory Purchase Act 2004 and is clear in identifying that strategic policies are those 'necessary to address the strategic priorities of the area (and any relevant cross-boundary issues)'; and provide a starting point for any non-strategic policies including for the purposes of neighbourhood planning.

- 1.7 Does the plan include policies designed to ensure that the development and use of land in Bassetlaw contributes to the mitigation of, and adaptation to, climate change?

## **BDC Response:**

The Local Plan includes multiple policies that are designed to ensure that the development and use of land, contribute to the mitigation of, and adaptation to climate change in accordance with Section 19 (1A) of the Planning and Compulsory Purchase Act 2004.

The following policies contribute directly to secure the objectives of Section 19(1A) of the Act and work directly towards supporting a transition in Bassetlaw towards a net zero system by 2038, which aligns with the national target of achieving net zero by 2050.

- POLICY ST1: Bassetlaw's Spatial Strategy
- POLICY ST2: Residential Growth in Rural Bassetlaw
- POLICY ST5: Worksop Central
- POLICY ST6: Cottam Priority Regeneration Area
- POLICY 9: Apleyhead Junction
- POLICY ST14: Management of Town Centres
- POLICY 21: Trinity Farm, Retford
- POLICY 27: Ordsall South, Retford
- POLICY ST30: Housing Mix
- POLICY ST35: Design Quality
- POLICY ST38: Green Gaps
- POLICY ST39: Green and Blue Infrastructure
- POLICY ST40: Biodiversity and Geodiversity
- POLICY 41: Trees, Woodlands and Hedgerows
- POLICY ST42: The Historic Environment
- POLICY ST44: Promoting Healthy, Active Lifestyles
- POLICY ST46: Delivering Quality, Accessible Open Space
- POLICY ST50: Reducing Carbon Emissions, Climate Change Mitigation and Adaptation
- POLICY ST51: Renewable Energy Generation
- POLICY ST52: Flood Risk and Drainage
- POLICY ST53: Protecting Water Quality and Management
- POLICY ST54: Transport Infrastructure and Improvements Schemes
- POLICY ST55: Promoting Sustainable Transport and Active Travel
- POLICY ST56: Safeguarded Land
- POLICY ST57: Digital Infrastructure

The SA Framework [PUB-024] includes specific objectives responding to the objectives of Section 19(1A) of the Act as set out below:

- SA1: Biodiversity and Geodiversity
- SA2: Housing
- SA5: Health and Wellbeing
- SA6: Transport
- SA7 Land Use and Soils
- SA8: Water
- SA9: Flood Risk
- SA10: Air Quality
- SA11: Climate Change
- SA12: Resource Use and Waste



- SA14: Landscape and Townscape

All policies including site allocations were tested against these objectives throughout the process to identify the effects and to avoid significant effects as well as facilitating better outcomes (see summary table on page 162 of the SA report [PUB-024]).

For new site allocations, the risk based sequential approach was taken to facilitate new development away from areas at higher flood risk and the sequential test report sets out the analysis [GB-009]. It concluded that all allocations passed the sequential test with the exception of Site HS7 (Trinity Farm) and Site HS13 (Ordsall South), however both subsequently passed the Exception Test.

Therefore, the Council considers that the policies are designed to secure that development and use of land, contribute to the mitigation of, and adaptation to climate change in accordance with Section 19(1A) of the Act.

## 1.8 How have issues of equality been addressed in the Local Plan?

### **BDC Response:**

The Public Sector Equality Duty requires public authorities in carrying out their functions to have due regard to the need to achieve the objectives set out under s149 of the Equality Act to:

- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010;
- (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it.
- (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

The Local Plan has been subject to a detailed Equality Impact Assessment (EqIA) at key stages of its preparation to support and ensure compliance with s149 of the Equality Act and the Council's published guidance. This includes the EqIAs for the Bassetlaw Local Plan: Publication Versions 2021 [PUB-013], January 2022 [PUB-022] and May 2022 [PUB-030].

Opportunities were identified within the Bassetlaw Local Plan [SUB-010] in relation to equality consideration and to address issues raised during the plan-making process. These are addressed in the submitted Local Plan [SUB-010]. For example:

- Ensuring that the EqIA represents all nine protected characteristics of the Equalities Act 2010, that these are correctly represented and referred to in the EqIA including by replacing the term 'Sex' with 'Gender'
- Ensuring the needs of the Gypsy & Traveller and Travelling Show People communities are met
- Ensuring that all residents of the District have access to the necessary green infrastructure, open space and community facilities to enable and encourage healthy lifestyles
- Ensuring all housing policies aim to provide access to housing and meet identified need for all socio-economic backgrounds, as well as encouraging a mix of housing provision on sites especially affordable housing

- Ensuring all residents of the District have equal access to variety of new employment opportunities

Therefore, it is considered that the issue of equality has been addressed sufficiently in the Bassetlaw Local Plan.

1.9 Does the plan comply with all other relevant legal requirements, including in the 2004 Act (as amended) and the 2012 Regulations?

**BDC Response:**

The Council considers that the Local Plan complies with all other relevant legal requirements within the Planning and Compulsory Purchase Act 2004 (2004 Act) and the Town and Country Planning (Local Planning) (England) Regulations 2012 (2012 Regulations). This includes being consistent with the provisions of the National Planning Policy Framework, 2021 and national PPG as required by the 2004 Act (19 2a)

In accordance with the 2012 Regulations 2012 (s9 (1-2)) the Council has prepared a Policies Map to accompany the Local Plan which illustrates geographically the policies in the Local Plan. The Policies Map of the Council's area is based on an Ordnance Survey map and has an explanatory key. Paragraph 2.10 of the Local Plan states that if there is conflict between the text and map the text prevails, consistent with the 2012 Regulations (s9 (2)).

The Council is also of the view that the Local Plan complies with all relevant matters identified by provision (10) of the 2012 Regulations.

In accordance with the 2012 Regulations, key consultations for the Local Plan have been undertaken as part of the plan-making process:

- Regulation 18 – Preparation of a Local Plan (5 consultations)
- Regulation 19 – Publication of a Local Plan (3 consultations)

The Council's Consultation Statement July 2022 [SUB-012] paragraph 1.1 sets out the purpose of the statement. The document also acknowledges the 2012 Regulations, and the Council's 2020 Statement of Community Involvement [BG-008]. Table 1 [of SUB-012] identifies and explains the main consultation stages which were followed to reach submission. It complies with Regulation 18 and provides a comprehensive list of when the 5 consultations took place. Paragraphs 3.3 - 3.156 all relate to Regulation 18. With respect to Regulation 19 Table 1 [of SUB-012] provides a detailed list of the three consultations, and paragraphs 3.157 - 3.172 set out how these consultations were prepared in accordance with the 2012 Regulations and the SCI, and the approach used.

The Council provided information of the main issues in SUB-007 as per the 2012 Regulation (22 (c) iii).

Appendix 1 [of SUB-010] clearly identifies those Core Strategy and Development Management Policies DPD policies that will be replaced by a new policy (or policies) in the Local Plan. Therefore, it is Council's view that Appendix 1 is consistent with Regulation 8(5) of the 2012 Regulations.

The Local Plan Section 1.0 clearly states that the document is a Local Plan, whilst paragraph 1.5.6 recognises that the Nottinghamshire Minerals Local Plan 2019-2036 and the Nottinghamshire and Nottingham Waste Core Strategy 2013 form part of the Development Plan for the District, and that the Local Plan must complement those Plans. Paragraph 1.14.1 confirms that as per the Localism Act 2011, made neighbourhood plans also form part of the District's Development Plan. Therefore it is considered that the Plan is consistent with Regulation 8(4) of the 2012 Regulations and 19 (2) (a-aa) of the 2004 Act.

Each Local Plan policy is accompanied by a reasoned justification which provides an explanation of relevant policies. This approach is considered compliant with Regulation 8(2) of the 2012 Regulations.

## **Matter 1b - Overarching Matters**

- 1.10 Is the plan period (2020 – 2038) justified, effective and consistent with national policy? If so, should the requirements/timescales for review of the plan be set out in policy?

### **BDC Response:**

The National Planning Policy Framework (NPPF) states that strategic policies should look ahead for a minimum of 15 years from the date of adoption (paragraph 22). The Council's Local Development Scheme (LDS), May 2022 [BG-024] identifies a potential adoption date of July 2023. An adoption date in 2023 would mean that as currently written the Local Plan would have a minimum 15 years time span.

This time span is considered to be sufficient to provide an appropriate strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period as sought by the NPPF (paragraph 23); and, is effective; in that it enables the Council and its partners to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure, as required by the NPPF paragraph 22.

Paragraph 1.16.1 of the Local Plan [SUB-010] and proposed suggested changes [in SUB-009a] set out the anticipated timescale for review of the Plan, as being within 5 years from the date of adoption i.e. 2023. The LDS [BD-024] confirms that the assessment for review will be undertaken by 2028 (at paragraph 4.2). This is considered to be consistent with the NPPF paragraph 33 which states that reviews should be completed no later than five years from the adoption date of a plan.

The Council therefore considers the plan period to be justified, effective and consistent with national policy, and the approach taken to review to be consistent with national policy.

- 1.11 Are there any 'made' Neighbourhood Plans, or any being prepared or in the pipeline? If so, how have these been taken into account and where is this evident?

### **BDC Response:**

As of October 2022, there were 21 made Neighbourhood Plans and a further 10 Plans in preparation within Bassetlaw. Others have, or are in the process of, undertaking reviews. Due to their contribution to the Development Plan, Made Neighbourhood Plans and ongoing liaison with communities have played a key role in the formation of Policy ST2 and the wider development options for the Spatial Strategy within Policy ST1. Sections 7-11 in the Council's Spatial Strategy Background Paper (SSBP), August 2021 [SS-004] provide the narrative on the evolution of the spatial strategy and the factors involved in its formation.

How has the emerging Worksop DPD been taken into account in the preparation of the plan?

**BDC Response:**

Following stakeholder and public consultation, the Council adopted the Worksop Town Centre Masterplan [DPD-015] in March 2021. The preparation and evidence work for the masterplan was underpinned by national planning policy priorities and strategic planning principles to ensure that the evidence base could appropriately inform the emerging Worksop Central DPD [DPD-014].

For consistency, the confirmation of the area boundary through the adopted masterplan led to the boundary also being identified for the DPD, and identified as the regeneration boundary associated with Policy ST5 and shown on the Local Plan Policies Map.

As part of the consultation for the masterplan discussions were had with landowners about site inclusion in the emerging DPD. This resulted in the site allocations contained therein, and also led to potential sites being considered unavailable at the owner's request.

Of the proposed site allocations, BDC own seven. The Council confirms that their land will be made available for development at the time indicated within the Regulation 18 DPD, as identified by the trajectory in the Local Plan [SUB-010] and in the Council's response to Initial Inspectors Questions [BDC-001].

The Regulation 18 consultation for the Worksop Central DPD [DPD-014] was undertaken in June 2021, alongside a Regulation 18 focussed consultation for the Local Plan. This consultation also included a formal Call for Sites for land within the Worksop Central boundary. The justification for the Local Plan consultation was to ensure the DPD, and its associated evidence base primarily for flood risk, transport, and site delivery aligned with that for the emerging Local Plan and relevant policies therein.

As such, the outcomes of the Worksop Central DPD consultation [DPD-014] informed the Publication Version of the Local Plan in August 2021 [PUB-001].