## Bassetlaw Local Plan - Statement from Retford Civic Society October 2022

## Matter 1a – Legal Compliance

Issue 1.4 Does the Sustainability Appraisal (SA) provide a comprehensive and robust basis to inform the strategy and contents of the plan?

The Council has made a strategic decision to go for a very high level of housing growth but it is not clear why it has done so. The Plan provides for 2.4 times the number of additional dwellings required by the government's 'standard method' of assessment but there is insufficient evidence to justify this.

A public statement by Cllr White, the cabinet member responsible for the Plan, is quoted in full in the Civic Society's October 2021 submission. She implied clearly that this major departure from previous planning policy was forced on the Council by government policy. That is not correct. Similar assertions, however, were made at the full Council meeting when the Plan was approved for submission to the Inspectorate (prior to the latest addendum).

The May 2022 Sustainability Appraisal also fails to provide an explanation of this decision. Its Table 4.4 includes four alternatives, all of which assume that the Apleyhead development will be successful. The highest housing figure cited here is 646 dw pa. but it is unclear where this figure comes from or why provision has been made for an even higher number of new dwellings.

The commentary in the Sustainability Appraisal refers to sustainability concerns if insufficient housing is provided for workers at Apleyhead. It is argued that this could lead to workers travelling into Bassetlaw by car. There appears to have been no consideration of the alternative scenario in which employment growth falls short of what the Plan expects but the housing allocations in the Plan are developed within the Plan period. This could lead to more Bassetlaw residents having to commute out of the District and to increased unemployment if the enlarged population cannot find jobs locally or in neighbouring areas.

In its third report, GLHearn, the Council's consultant, stated that, if the Council considers higher than expected employment is likely during the Plan period, it should test the implications of providing 562 – 591 dw pa. There is no indication that BDC has carried out any further analysis or that they have undertaken the testing recommended by Hearn.

Failure of the sustainability appraisal and other published documents to explain and justify the Council's strategic decision on the level of housing growth calls into question the soundness of the Plan. It also calls into question the adequacy of the public consultation carried out during the Plan's preparation because the Council's failure to identify and publicise its strategic decision on this matter made it difficult, if not impossible, for the public to comment on it in a meaningful way.