

Bassetlaw District Council Response to Inspectors Matters, Issues and Questions

Matter 2 – Vision & Objectives, Spatial Strategy & Location of New Development, and the Site Selection Process

4 November 2022

(Issue 2)

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

(Policies ST1 and 2)

Issue 2 – Are the provisions of the plan in relation to the Spatial Strategy & Location of New Development justified and consistent with national policy?

This matter focusses on the broad spatial distribution of new development and on the process by which proposed development sites have been selected for inclusion in the plan (Policies ST1 and ST2). The merits of individual site allocations are considered under Matters 3 and 6)

2.1 Is the proposed spatial strategy and the distribution of development (as set out in policies ST1 and ST2) supported by robust and up to date evidence and otherwise soundly based? In particular:

a) Does it reflect the vision and objectives of the plan?

The Council considers that the proposed spatial strategy and distribution of development within Policy ST1 and Policy ST2 is appropriately reflected in the Local Plan vision; paragraph 4.6 states that development will have been delivered in the most sustainable locations; the importance of sustainable transport accessibility is highlighted in paragraph 4.15; town centre growth/regeneration is addressed by paragraphs 4.6-4.8; whilst paragraphs 4.6-4.11 cover distribution of growth. Paragraphs 4.2-4.4 address the vision for employment land, with Apleyhead being the focus of paragraph 4.4. Housing needs are addressed within paragraph 4.12.

In line with the spatial strategy: Objective 1 seeks to locate new development in sustainable locations that support the sustainable pattern of growth across urban and rural areas, whilst seeking to minimise the loss of high quality agricultural land and promote effective use of brownfield land, in line with spatial strategy; whilst Objective 12 aims to reduce the need to travel by car by making sustainable travel more attractive and viable; and, Objective 13 looks to ensure that development appropriately contributes to infrastructure necessary to mitigate its impacts.

Objective 2 aims to promote a choice of land in appropriate and sustainable locations within and on the edge of settlements for housing that meets local needs, reflective of the approach taken to the distribution of growth. Objective 5 recognises the importance of providing homes within rural settlements to support local communities, whilst recognising that quality countryside is retained and used appropriately, consistent with the approach taken by Policy ST1 and Policy ST2.

With regard to employment land and town centres; Objective 3 identifies the need to provide the right conditions, land and premises to accommodate general employment growth, inward investment as well as the needs of the sub-regional/regional logistics sector. Objective 6 supports the protection and enhancement of town centres and seeks to secure their positive regeneration.

To strengthen consistency with the vision and Policy ST1 and ST2 the following modifications are proposed to clarify the Council's approach:

4.3 The District's significant employment land portfolio will have contributed to the step-change in the Bassetlaw economy, in part benefitting from the quality and diversity of available, accessible and market attractive sites. These will have secured more, higher quality, better paid jobs for local residents, catalysed new enterprise...

4.5 Meanwhile Apleyhead will have attracted significant investment in the logistics sector at a sub-regional/regional scale, supporting flexible market leading and market facing large scale logistics employment space bringing higher employment rates, higher personal income and greater economic diversification to the District, whilst generating significant gross value to the regional economy. Active travel and public transport improvements will ensure greater accessibility for the wider community, whilst the road network will have benefited from appropriate improvements to maintain its efficient operation.

4.6 New development will have been delivered in the most sustainable locations, primarily the Main Towns. The principal town of Worksop will have sustainably grown with high quality housing and employment, new transport and community infrastructure in place around the urban edge, complementing organic, smaller scale infill growth within the urban area. Worksop town centre and its environs will be benefitting from the start of comprehensive brownfield regeneration and associated environmental improvements that bring with it an improved community, commercial and leisure offer to the benefit of residents, businesses and visitors not only within the central core, but the wider town and District. ~~Worksop itself will have sustainably grown with high quality housing, new transport and community infrastructure in place around the urban edge which together with a diverse and enhanced town centre offer will support the needs of the new residents and existing communities alike.~~

4.7 The market town of Retford will have grown appropriately, with a wider range of new housing available within the urban area and on the edge of the town, better suited to meet local residents' needs irrespective of time in life, while a new country park, community infrastructure and transport improvements will provide benefits to existing and new communities.

To provide greater consistency between Policy ST1 and the vision and objectives the Council proposes a modification to Part 1 a) as:

Policy ST1 a) managed sustainable development and growth, appropriate to the size of each settlement or location to meet the evidenced need for new homes and jobs, to regenerate the District's town centres, and to support necessary improvements to infrastructure, services and facilities by:

b) To what degree is the spatial framework in Policy ST2 based on the settlement hierarchy in Policy ST1? Is the focus on strategic allocations in the larger urban settlements justified and soundly based?

Policy ST1 promotes a settlement hierarchy which aims to distribute development in a sustainable manner across the District. This is considered to be an appropriate structure for organising the Local Plan and the distribution of growth, acknowledging the inter-relationships between the three Main Towns and the rural area, and the inter-relationships between the Large and Small Rural Settlements and the countryside.

The hierarchy is based on the following factors; the size and population of each settlement, the range of services and facilities available at each settlement, their accessibility by public transport, their infrastructure capacity and their ability to sustainably accommodate the needs generated by new development. This is justified through the evidence base including, the Land Availability Assessment [BG-030], Sustainability Appraisal [PUB-024] and the Infrastructure Delivery Plan Baseline Assessment, November 2020 [TI-007].

Policy ST2 identifies eligible Large Rural Settlements and eligible Small Rural Settlements where growth can go in the Plan period. The tiers and the eligible settlements within each correspond with those identified in Policy ST1.

Additionally, Policy ST2 identifies which Large and Small Rural Settlements are eligible, defined by their size, role and function, in terms of the level of services and facilities they provide to the community and their catchment (within the Bassetlaw Rural Settlement Study [SS-002]), to accommodate growth over the Plan period. This is considered to align with the approach taken to inform the settlement hierarchy in Policy ST1.

Furthermore, Policy ST2 Parts 2 and 3 are considered to align with the spatial principles of Policy ST1 a)i which seeks to promote the effective use of land and previously developed land, as well as parts c) and d).

The Council consider the focus on strategic allocations in the larger urban settlements to be justified and soundly based. Based on the factors identified above, the Main Towns are considered to be the most sustainable locations for growth in the district. Worksop is the principal town (paragraph 5.1.46 [of SUB-010] details), so it is considered should take the most growth, Retford is acknowledged to be the second town (paragraph 5.1.49 [of SUB-010] details), with Harworth & Bircotes the third town on account of its ongoing regeneration (paragraph 5.1.51 [of SUB-010] details).

Within the housing supply for the Plan period each town also has a number of completions and commitments (in Figure 8 [of SUB-010]) that should also be taken into account in achieving an appropriate distribution of housing.

The Land Availability Assessment 2022 (LAA) [BG-030] assesses a range of sites, including those within/adjacent to each town. All proposed site allocations and reasonable alternatives have been assessed by the Sustainability Appraisal 2022 [PUB-024] and the wider evidence base including for landscape, flood risk and heritage. Statutory consultees and infrastructure partner views were also sought on implications of site delivery individually and cumulatively. The approach, and conclusion is set out within the Site Selection Methodology 2022 [SS-025].

In accordance with the NPPF, the Council sought to make effective use of land; all suitable, available and achievable brownfield/underused land within the development boundary was identified. This was insufficient to support the balance of the housing requirement.

Edge of settlement sites were then considered in Worksop and Retford. The Sustainability Appraisal [PUB-024] and the LAA [BG-030] concluded that the strategic allocations are those that would cause least harm to the environment, are suitable for development and would take the urban area to clear and defensible boundaries. This is considered to be in line with the NPPF paragraph 73.

The strategic allocations are considered to support the delivery of infrastructure and local facilities in the Plan period and will also help to facilitate a range of housing that meets identified local needs for each town, including for affordable and specialist housing, thereby consistent with the Plan’s vision and objectives.

The Local Plan does not allocate land within/adjoining Harworth & Bircotes because the level of existing commitments and the level of completions to date in the Plan period is considered sufficient to meet the town’s needs to 2038.

The Whole Plan Viability Assessment 2022 [PUB-028] site specific assessments indicate a positive viability margin beyond a reasonable developer profit return for the strategic site allocations, having allowed for all stated cost and developer contribution factors so are deemed viable and deliverable. Additionally, the site promoters state that the each site is able to deliver in accordance with the housing trajectory and is able to provide the infrastructure and housing mix required. The Council is working with strategic site promoters to prepare SOCGs which will be uploaded to the examination library in due course.

c) Would the pattern of development proposed meet the needs of larger settlements in the district?

Policy ST1 proposes a settlement hierarchy as an effective way to distribute housing growth over the plan period. Paragraph 5.1.37 [of SUB-010] states that housing growth will be directed to the most sustainable settlements commensurate with their place in the settlement hierarchy. In selecting the scale of housing to be provided in each town, the Council gave consideration to constraints on development, such as flood risk, heritage, ecology and landscape; infrastructure capacity; the supply of potential development sites in the LAA [BG-030] and the viability of development. The Sustainability Appraisal [PUB-024] identified potential sensitivities which were taken into account.

The spatial strategy leads to the distribution of housing growth as identified by Figure 8 [of SUB-010], summarised below in Table 1. This shows the three larger settlements (the three Main Towns) are taking approximately 70% of the growth, with Worksop as the principal town absorbing about a third of the growth.

Tier	Total growth	% growth
Worksop	3444	30.3
Retford	2272	20.0
Harworth & Bircotes	2199	19.4
Large Rural Settlements	1535	13.5
Small Rural Settlements	1826	16.1
Other Villages & Countryside	75	0.66
TOTAL	11,351	100.00

It is considered that this distribution of growth will seek to meet the required housing needs of the larger settlements over the Plan period, including an appropriate contribution to affordable and specialist housing in the Main Towns where access to shops, services and public transport is more straightforward, and where the infrastructure capacity is more sustainable. The Main Towns, as the district’s larger settlements, are considered to be the locations which are most sustainable, accessible and where there is a realistic option to use sustainable travel modes. As such, the Council considers that the proportion of development that is to be located at the Main Towns is appropriate to meet their needs over the Plan period.

It is considered that the approach taken to employment growth meets the economic needs of the larger settlements commensurate with their position in the hierarchy, whilst considering constraints, land availability and the needs of the market.

2.2 What is the evidential basis for the settlement hierarchy in policy ST2? Does this accurately reflect the pattern of settlements across the district? Is this up to date? How does this inform the development strategy? What other factors influenced the strategy, such as physical and environmental constraints?

The evidential basis for the settlement hierarchy in Policy ST2 has evolved during the plan-making process; each has been tested through the sustainability appraisal [PUB-024]. This is explained further in the Spatial Strategy Background Paper 2021(SSBP), August 2021 [SS-004].

The Council's Rural Settlement Study (RSS), August 2021 [SS-002] differentiates between the relative sustainability of rural settlements and their potential to accommodate growth within Sustainability Matrix in Figure 4. The matrix categorises all rural settlements in rural Bassetlaw based on their size, facilities, and the level of service/infrastructure provision available. This is considered to be robust and up to date; the assessment of settlements has been reviewed in response to consultation feedback during the plan-making process. The approach taken aligns with good practice employed by other rural Local Authorities in the plan-making process.

The Council considers the settlement hierarchy in Policy ST2, as informed by the Rural Settlement Study [SS-002] accurately reflects the pattern of settlements in the district, and acknowledges their inter-relationships with the Main Towns as well as the inter-relationships between the Large and Small Rural Settlements and the countryside, which forms the basis of Policy ST1, and the Local Plan vision and objectives.

The development strategy is robustly justified; it builds on the Spatial Strategy Background Paper [SS-021] and a comprehensive evidence base. The evidence base is considered to be up to date, with the SSBP updated regularly during the plan-making process, most recently in August 2021.

As such, the proposed development strategy has been influenced by a range of physical and environmental factors; such as the risk of flooding; national and local environmental designations; and social factors; such as, access to public transport. This was evidenced through the plan-making process and supplemented in responses from statutory consultees and through direct liaison with Neighbourhood Plan groups/Parish Councils. Where these factors proposed a severe constraint to development, it has been reflected within some proposed growth requirements.

During the preparation of the plan, many comments received from Neighbourhood Plan groups/Parish Councils supported only more limited development in settlements due to the current high level of commitments or limited local infrastructure provision. Through the development strategy, the Council therefore has sought to strike a balance between these views and those of the development industry which seeks slightly higher levels of development. The development strategy (as modified) is considered to be of a scale and location that takes into account evidenced constraints, but which will sustainably support the vitality of rural communities, in accordance with Policy ST1.

2.3 What other spatial strategies and distributions of growth were considered during plan preparation, and why were they discounted? Where is the evidence for this? Were alternative approaches tested in the Sustainability Appraisal work?

Through the plan-making process the Council has considered and consulted on a range of spatial strategies and distributions of growth. These are clearly documented within the Council's Spatial Strategy Background Paper 2021 [SS-004].

The approach to the spatial strategy and distribution of growth in Bassetlaw has evolved over time. The Spatial Strategy Options Paper, 2016 [SS-030] identified five strategic options for the area, each with a different spatial strategy and distribution of growth. This informed a more detailed Initial Draft Bassetlaw Local Plan, 2016 [BG-023] which promoted a hybrid strategy of those options identified in SS-030. Strategic Proposal 1 identified five tiers: Worksop, Retford and Harworth & Bircotes; Rural Bassetlaw Functional Cluster (based on rural networks of supporting settlements) and Wider Rural Bassetlaw, which included the establishment of a new settlement.

Each tier would support a different scale of growth relative to its role and sustainability. Distribution of growth within the larger settlements included urban extensions, site allocations, urban intensification, extant planning permissions and organic growth. For Worksop this included identifying sites that are close to the town centre and key transport interchanges.

The Functional Clusters contained a number of Defined Rural Settlements where growth, capped at 20% would be supported. Distribution of rural growth was proposed by: Neighbourhood Planning, extant planning permissions and organic growth.

Feedback from this consultation resulted in a more refined hybrid approach in the Draft Bassetlaw Local Plan: Part 1 Strategic Plan, January 2019 [BG-007]. The proposed spatial strategy in Policy 1 focussed on five parallel and interconnected spatial strategy strands, informed by updated evidence and land availability. It maintained that the district's different parts and settlements had their own roles and opportunities, but that the strategy should not follow a hierarchical or functional cluster model; or that the larger settlements should be the primary focus for growth, to support investment in the rural area.

The five spatial strategy strands were comparable to the hybrid approach [in BG-023]: Worksop; Retford; Harworth & Bircotes; Rural Bassetlaw; and, a Garden Village. The growth would be distributed equitably via strategic allocations, site allocations and organic growth. Employment growth was also distributed through the spatial strategy, with the A1 near Harworth & Bircotes recognised as having employment land potential. A Garden Village was proposed at Gamston Airfield and the former Bevercotes Colliery, with the aim to regenerate former brownfield land and to improve local infrastructure.

The January 2020 Draft Bassetlaw Local Plan [BG-006] maintained that the district's different parts and settlements had their own roles and opportunities, but considered that a hierarchy was an appropriate structure to manage sustainable development and distribute growth.

Six tiers were identified reflective of the approach taken in 2016 and 2019: Worksop; Retford; Harworth & Bircotes; Large Rural Settlements; Small Rural Settlements; and, a Garden Village. Rural Bassetlaw was split into two tiers but maintained the upper growth threshold of 20% per parish. The concept of a new Garden Village was maintained, but the location changed due to inconsistencies with national policy and

legislation and further evidence base work identifying significant environmental constraints.

The strategy and distribution of employment growth changed in response to availability of sites, scale of land with planning permission, evidence from the market about the potential of the A57 and A1 corridors, and the Council's objective to diversify the economic base so that residents benefitted from more, higher skilled, better paid employment opportunities.

The November 2020, Draft Bassetlaw Local Plan [BG-004], maintained the spatial strategy and categories within the settlement hierarchy. But to better enable growth to be distributed commensurate with each settlements position in the hierarchy, the level of housing growth within some tiers was re-visited relative to their sustainability credentials. This included a different percentage growth requirement for Large and Small Rural Settlements. The strategy and distribution of employment growth was maintained.

The Bassetlaw Local Plan 2020-2038: Publication Version [BG-001] and addendums [PUB-015], [PUB-023] maintained the tiers within the settlement hierarchy; but discounted the Garden Village at Second Addendum [PUB-023] as a result of one landowner withdrawing their land. The approach taken to housing and employment growth distribution was maintained.

The Council acknowledges that the approach taken to the spatial strategy and distribution of growth has evolved since 2016, but considers that the key principles and categories of the spatial strategy have been maintained, and are broadly consistent with that promoted and tested in 2016. At each stage, the detailed parameters have been refined taking into account consultation feedback, new/updated evidence base documents and the availability of land. Each has been robustly tested and evidenced as the plan-making process has evolved.

In terms of the distribution of growth, this has also evolved over time, to achieve in the Council's view a distribution that is better aligned with the principles of the different roles and functions of settlements and land within the hierarchy and the underlying principle of achieving sustainable development.

The SA [PUB-024] has been carried out iteratively at each stage of plan-making since 2016, with the findings being taken into account by the Council alongside other relevant factors to inform decision making. The respective Sustainability Appraisals (SA) document the identification of the spatial strategy, the alternatives considered through the plan making process, and the reasons for discounting alternatives.

- 2.4 Do policies ST1 and ST2 allow sufficient development in large rural settlements, small rural settlements and other villages to comply with para 79 of the Framework? How were the proportions of development proposed for each settlement arrived at?

The Council considers the approach taken by Policy ST1 and ST2 is consistent with paragraph 79 of the NPPF in that it allows sufficient development within rural settlements, but takes local circumstances into account, to reflect the character, needs and opportunities of each area, so thereby supports the aims of achieving sustainable development.

Neighbourhood planning is seen as being a key mechanism to facilitate sufficient development in the rural area. Policy ST1 and ST2 also provide an appropriate policy framework within which communities can, through neighbourhood planning, deliver sufficient housing, appropriate to local context, to enhance or maintain the vitality of rural communities (as per the NPPF).

In August 2018, the Council calculated the existing dwellings within each settlement in order to form an up to date baseline number of dwellings per Parish. The baseline number was used to form a consistent basis for the application of a future percentage uplift in proposed growth through the development of the spatial strategy.

Through the plan-making process, the Council has considered and consulted on various growth options in the rural area as set out within the Spatial Strategy Background Paper 2021 [SS-021]. These included different percentage growth requirements, a cap, and a blanket 20% increase across all large and small rural settlements. It has been influenced by the scale of committed development, evidenced physical and environmental constraints, and consultation feedback from the local communities and development industry.

The January 2020 Local Plan [BG-006] identified two tiers within Rural Bassetlaw: Large Rural Settlements and Small Rural Settlements but maintained the upper growth threshold of 20% per parish (as within previous draft plans). The November 2020 Local Plan [BG-004], maintained the spatial strategy and categories within the settlement hierarchy and sought to better align the distribution of growth with each settlements position in the hierarchy. This was to ensure that the approach better reflected the role, function and sustainability credentials of each tier of the hierarchy and varying levels of growth being proposed through neighbourhood plans.

In parallel, it was considered that the significant number of existing residential planning permissions across the rural area should also be better considered in the proposed housing requirement for the rural settlements. As such, the individual housing requirements for eligible settlement were re-assessed and Policy ST2 identified a different percentage growth requirement for large and small settlements relative to their sustainability credentials.

Applying a lower standardised growth requirement for small rural settlements means that, the distribution of growth in Policy ST2 reflects the approach taken to the settlement hierarchy and spatial strategy across the District in Policy ST1 in terms of sustainability; the Large Rural Settlements, as the more sustainable locations, accommodate more growth than the less sustainable Smaller Rural Settlements.

Feedback from consultees was an important determinant in understanding how the level of growth could impact particular settlements/tiers of the hierarchy. The Council therefore has sought to strike a balance between these views and those of the development industry by providing for a sustainable level of growth, whilst responding to local circumstances.

- 2.5 Are the proposed settlement development boundaries appropriately drawn? What factors were taken into account in designating these? Is the approach taken in relation to settlement boundaries in Small Rural Settlements justified and consistent with national policy?

The Council's adopted Core Strategy and Development Management Policies DPD, December 2011 [BG-022] designated a series of development boundaries for settlements across Bassetlaw.

For the Main Towns and Large Rural Settlements (Worksop, Retford, Harworth Bircotes, Carlton in Lindrick, Langold, Blyth, Misterton and Tuxford), the principle of development boundaries have been carried forward into the Local Plan to help manage new development via Policies ST1 and ST2. This is considered appropriate as these settlements are expected to accommodate the larger proportion of growth over the Plan period.

Due to the scale of completed development since the adoption of the Core Strategy in 2011, the Council has undertaken a review of the extent of development boundaries so that these are up to date and consistent with the emerging spatial framework. The methodology for the development boundary review is identified within Development Boundaries Background Paper, September 2021 [SS-001].

The Local Plan has not identified any development boundaries for Small Rural Settlements. However, it is recognised that a number of made Neighbourhood Plans have designated their own development boundaries and as such this has been reflected within Policy ST1 Part 1d) and Part 2 of Policy ST2. The Council consider this approach to be justified and consistent with paragraph 29 of the NPPF which encourages neighbourhood plans to shape, direct and help to deliver sustainable development at a local level.

- 2.6 Have the sites allocated for development in the plan been appraised and selected in comparison with possible alternatives using a robust and objective process?

The Council considers the site selection process to be robust, consistently applied and objective. A summary of the site selection process is provided below; more detail is set out within the Council's Site Selection Methodology (SSM), May 2022 [SS-025].

In order to make the site selection process as consistent as possible, section 8 of the SSM [SS-025] provides a clear process on how sites would be appraised in combination with other evidence base documents such as the Land Availability Assessment (LAA), May 2022 [BG-030] and the Sustainability Appraisal [PUB-024]. The methodology identifies a four stage process and categorised sites (housing, employment and Gypsy & Travellers sites) by a R.A.G system based on their potential for development. This is considered to be robust and consistent with the methodology within the Housing and Economic Land Availability Assessment PPG.

Stage 1 – a sieving process was applied to all sites through the LAA [BG-030], which served the purpose of discounting sites at an early stage that have either: no realistic prospects of delivery; are considered unsuitable for their proposed use due to identified locational or land constraints; or fail to meet the required capacity thresholds (sites must be capable of accommodating 5 or more dwellings or for non-residential development 0.25ha or capable of accommodating 1000sqm floor space).

Stage 2 – remaining sites underwent a second sieve through the LAA [BG-030], where their existing status and use rendered further assessment against the Local Plan's vision, objectives and ability to contribute to the delivery of the spatial strategy. This involved consultation with statutory consultees relating to constraints and/or infrastructure capacity concerns.

Stage 3 – remaining sites at this stage were considered potentially suitable for a proposed use and were considered as ‘reasonable alternatives’ within the LAA [BG-030]. These sites were then assessed through the Local Plan evidence base for matters such as flood risk, landscape, and also by the Sustainability Appraisal (SA) [PUB-024] in more detail against the sustainability objectives and criteria identified within Table 2.1 [of PUB-024]. Appendix 1 of the SA report includes tables for each site justifying the reason(s) why sites were either selected or discounted.

Stage 4 – Following their appraisal at stage 3, remaining sites at stage 4 were recommended for allocation within the Local Plan and subject to further consultation during the plan-making process.

The staged process enabled the Council to fully assess the suitability, availability and deliverability of land consistently and in line with the objectives of the Local Plan, the wider spatial strategy and the principles of national policy.

2.7 Are the plans assumptions in relation to the amounts and timing of development to be delivered through neighbourhood plans and the Worksop Central Development Plan soundly based?

The delivery assumptions for development to be delivered through Neighbourhood Plans are based on the approach identified within paragraphs 5.6-5.16 and Appendix 3 of the Council’s Five Year Housing Land Supply Statement [SS-019], supplemented by monthly updates within the Rural Monitoring Framework which gives a strong indication of current development activity.

Assessment of the suitability, availability and developability of neighbourhood Plan allocations is set out in the evidence base for each made Neighbourhood Plan.

The Plan envisages that 649 dwellings will be provided by draft allocations in the Worksop Central DPD over the plan period. The trajectory for the delivery of these sites is set out in BDC-01 Appendix 3.

Assessment of the suitability, availability and developability of these sites is set out within the Worksop Central DPD Land Availability Assessment [DPD-013].

Of the 18 sites in this category, there are 5 which are expected to contribute to delivery in the 5 year period to March 2028. Further specific information on the deliverability of these sites is set out in BDC-01 Appendix 2.

Site capacity has been assessed having regard to planning applications and density assumptions as set out in the LAA [BG-030]. The delivery assumptions for development are based on the approach in paragraphs 5.6-5.16 and Appendix 3 of the Council’s Five Year Housing Land Supply Statement [SS-019].

2.8 Are policies ST1 and ST2 otherwise justified and consistent with national policy? Are there any omissions in the policies and are they sufficiently flexible?

The Council consider Policy ST1 and Policy ST2 to be justified and consistent with national policy as they provide the overarching policy framework to deliver a spatial strategy that promotes the principles of sustainable development in line with the objectives of paragraph 8 of the NPPF, and the distribution of growth that ‘promotes a sustainable pattern of development that seeks to: meet the development needs of the

area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects' consistent with NPPF paragraph 11a).

Additionally Policy ST1 provides a robust framework within which other strategic policies and the wider spatial framework of the Plan can effectively function via other strategic growth-led policies such as Policies ST2, ST5 and ST6, reflective of national policy.

Policy ST1 and Policy ST2 are considered to provide an appropriate strategy that forms a place-based approach to growth in response to the local context of Bassetlaw as evidenced within the Spatial Strategy Background Paper (SSBP) [SS-004] and the Rural Settlement Study (RSS) [SS-002] and the wider evidence base. They look ahead over a minimum 15 year period from adoption, to anticipate and respond to needs and opportunities (as per NPPF paragraph 22).

Policy ST1 accords with paragraphs 15 and 16 of the NPPF which requires Local Plans to provide a positive vision for the future of the area and provide a framework for addressing housing needs and other economic, social and environmental priorities. Policy ST1 seeks to fully meet the demands of new homes, jobs and services in line with paragraph 20 of the NPPF, while Policy ST2 provides a framework for residential development within the rural area and provides a requirement figure in response to paragraph 67 of the NPPF.

As such, the Council considers the hierarchy to be an appropriate and justified structure for distributing growth which is responsive to: the range of services present; accessibility to public transport; infrastructure capacity; and their ability to expand sustainably. Further details are set out above.

The Council considers Policy ST1 and Policy ST2 to be flexible enough to accommodate needs not anticipated in the plan; the proposed housing figures, employment need and number of pitches for the Gypsy and Traveller community are the baseline position to meet the needs over the Plan period in line with paragraph 22 of the NPPF. Policy ST1 also recognises the contribution windfall development is expected to make, which provides scope for housing sites not identified in the plan to be considered as they come forward.

Policy ST2, Part 3, provides flexibility in that there is scope for the level or distribution of growth within eligible settlements to be increased or justified differently – through the demonstration of community support - within a neighbourhood plan/review or through a developer-led proposal. The approach taken by Policy ST2 is considered to give an appropriate 'platform' for local people to shape their surroundings including through the development plan process as required by the NPPF paragraph 15.

2.9 Do the vision and objectives of the plan adequately address matters of climate change and air quality?

The Council considers that the matters of climate change, including the implications for a range of spatial planning matters, and air quality are addressed within the vision: paragraphs 4.14 – 4.17 of the Local Plan [SUB-010].

The vision states that by 2038, there will be a “secure, reliable, affordable net zero and low carbon energy mix that will help to reduce locally produced greenhouse gas emissions”. There will be “significant new renewable energy infrastructure which will make meaningful contributions across the District”, “whilst the increasing provision of

localised renewable and low carbon technologies will better enable residents and businesses to transition to a net zero carbon district by 2050”.

The vision also states that “Careful planning and design of developments will ensure that more vulnerable development located in areas of low flood risk, and use of sustainable drainage systems will manage run-off sustainably”. “Energy efficient design of homes and businesses will ensure they require less energy to heat, whilst a more comprehensive, better connected and extended walking and cycling network, and improved access to public transport will mean more residents can use active or sustainable travel for local journeys, thus reducing the reliance on the car. Provision of infrastructure to support the use of electric and/or alternative fuel vehicles will make a meaningful contribution to reducing the District’s carbon footprint”.

The vision concludes by stating that “extensive tree planting, protection and enhancement of veteran trees, valuable habitats and species, and biodiversity net gain will secure environmental quality benefits, sequester carbon and build our resilience to climate change at the same time”.

Climate change and air quality are cross cutting matters, so it is considered appropriate that three Strategic Objectives 10, 11 and 12 will be met to achieve the vision within the Local Plan.

Strategic Objective 10 aims to provide an environment “... where biodiversity can thrive, respond and adapt to climate change”, whilst Strategic Objective 11 aims to “support Bassetlaw’s transition to a net zero carbon District through the efficient use of resources, careful location and design of new development, the use of sustainable construction methods, whilst by increasing resilience to impacts from climate change through tree and woodland planting, reducing exposure to flood risk, promoting energy and water efficiency, use of integrated water management and minimising waste generation; whilst maximising opportunities to generate and use a vibrant mix of renewable energy, zero carbon and other alternative technologies”.

In terms of the impact of transport Strategic Objective 12 aims to “... help make walking, cycling and public transport a more attractive and viable choice to jobs and everyday facilities to help reduce the need to travel by car particularly for local journeys, ...”.

As such, the Council considers the vision and objectives of the Local Plan adequately address matters of climate change and air quality. Both the vision and the objectives promote the transition to net zero carbon, a strong emphasis on the careful location and design of new development, sustainable construction methods and the promotion of tree and woodland planting which significantly contribute to managing air quality.

For consistency with national policy and clarity, the Council proposes a modification to both the vision and objectives to refer to the words ‘air quality’:

- Paragraph 4.15 (of the Vision) “...and improved access to public transport will mean more residents can use active or sustainable travel for local journeys, thus reducing the reliance on the car and in turn improve air quality”
- Paragraph 4.17 (Strategic Objective 11) “...whilst by increasing air quality and resilience to impacts from climate change through tree and woodland planting...”

2.10 Are the Council’s proposed modifications to the policies necessary for soundness?

The justification for modification M1.12 is proposed as a factual correction and for internal consistency with the local plan.

The justification for modification M1.13 is proposed in response to representations received from Spawforths following consultation of the publication version of the local plan, to provide align more comprehensively with the spatial strategy. Therefore, it is considered these changes are justified in order to produce an effective local plan and the modifications are necessary to enhance soundness.