

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

## **Matter 3 – Employment Land**

**4 November 2022**

(Issue 3)

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 ST7, 9, ST10 and ST11)**

#### **Issue 3 – Are the provisions of the plan in relation to the provision of employment land justified and consistent with national policy? Would the allocations be developable, deliverable and otherwise soundly based?**

- 3.1 Is the supply of 183 ha of local employment land justified in order to provide for future employment needs in the district? How were the sites selected? Were they selected in comparison with possible alternatives using a robust and objective process?

##### **BDC Response:**

The supply of 183 ha of local employment land is considered justified in order to provide for future employment needs in the district. The Bassetlaw Housing and Economic Development Needs Assessment (HEDNA) November 2020 [SS-007] replaces the previous - Bassetlaw Economic Development Needs Assessment (EDNA) 2019 [SS-010]. The 2019 EDNA [SS-010] had recommended a lower local employment land need solely derived from a labour demand model however this did state “a positive approach to development may enable a higher level growth” (paragraph 7.43).

The HEDNA [SS-007] (paragraph 10.5) “recommends that the Council consider planning for the completions trend land figure for B2 and B8 uses for their plan-making purposes rather than the labour demand model but maintain the [labour demand] growth scenario B1 needs. This is due to uncertainties in relating labour densities in industrial floorspace to business needs.”

The use of labour demand modelling to generate the B1 figure is considered appropriate as there is considered to be a clearer link between jobs growth in office related sectors and actual demand for offices.

For B2 and B8, it is considered there are a number of factors which weaken the relationship between floorspace and growth. Increases in productivity (GVA per head) are facilitated by investment in capital and premises, but not necessarily in jobs. This is particularly relevant to automating sectors such as manufacturing and logistics. As a result, floorspace requirements may be growing whilst employment is static or declining. Furthermore, the need to replace lost or ageing stock that is no longer fit for modern businesses purposes is a further driver of demand. This means that linear relationships between jobs change and certain floorspace needs are increasingly weakened.

In this context, the forward projection of a past completions trend is considered to provide greater reliability and certainty of future industrial and warehouse needs. The approach is compliant with the Housing and Economic Needs Assessment Planning Practice Guidance Paragraph: 027 Reference ID: 2a-027-20190220 which includes

that “analysis based on the past take-up of employment land” can be used to forecast future needs.

Table 64 of SS-007 brings together the labour demand modelled B1 needs and the completions trends B2 / B8 needs to recommend the 186.9 ha of need.

This increase from the level of need set out in 2019 [in SS-010] is further reinforced by TI-014 (Bassetlaw A1 Logistics Assessment, 2021) which highlights (in paragraph 4.2) that industrial and logistics demand is “...at an all-time high due to retain market restructuring and a move to online and ecommerce type deliveries” and the “A1 corridor not seen as much activity historically but has seen a surge in demand as the M1 becomes increasingly supply constrained, congested and expensive.”

The approach taken to site selection is addressed in the Council’s response to the Initial Inspector’s Questions [BDC-02]. The process identified by paragraphs 3.6-3.26 within the Employment Land Topic Paper 2022 is considered robust, with the site assessments updated where relevant in response to new evidence and/or through feedback. Following consideration in the Land Availability Assessment [BG-030] all potential site allocations and reasonable alternatives have been assessed by the Sustainability Appraisal [PUB-024] as per paragraphs 3.11-3.12 and paragraph 3.25 of the Topic Paper.

It is considered that the SA [PUB-024] provides a robust and objective 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. From 2018 to the present, the SA has been carried out by independent consultants (LUC) on behalf of the Council, so is considered to be objective.

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 to the SA is based on current best practice and that within the national Strategic Environmental Assessment and Sustainability Appraisal Planning Practice Guidance, which involves carrying out SA as an integral part of the plan-making process so is considered to be robust and effective.

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, that were likely to result from policy options. Therefore, the appraisal of options (including site options) is consistent, robust and objective and site appraisals can be compared on a like for like basis.

All site options were initially appraised (Chapter 5 [of PUB-024]) on the basis only of the site boundaries and not taking into account any other information that may be available about specific proposals for each site or mitigation measures that may be incorporated. This ensures robustness, consistency and objectivity 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 being removed from the SA.

As such, it is the Council's view that the sites have been selected in comparison with possible alternatives using a robust and objective process.

3.2 Is the restriction to B2, B8 and Class E (g) justified for new employment allocations?

**BDC Response:**

To help deliver the Spatial Strategy (Policy ST1) and meet the level and distribution of employment growth identified, it is considered appropriate for new employment allocations within Policy ST7 to be allocated for B2, B8 and E (g) use.

The Bassetlaw HEDNA Addendum 2022 [SS-024] identifies the employment need for the Plan period. This is based on assumed jobs growth within Class B2, B8 and E (g). Policy ST7 seeks to ensure that enough land is provided to meet the employment land need requirement. The site allocations are considered to be those essential to stimulate employment opportunities, help to diversify the economy and assist in job creation and training particularly in the identified growth sectors. As such it is considered appropriate and justified for Policy ST7 to focus on those Use Classes, otherwise the approach could undermine the Local Plan vision and objectives.

3.3 In relation to strategic employment needs:

- a) Is the allocation of 119ha at Apleyhead, in addition to land identified for "General and Larger Unit Employment Sites" justified and consistent with national policy?
- b) What factors led to its allocation? Is it based on up-to-date evidence?
- c) Has the allocation had appropriate regard to the potential wider strategic impact of the development?

**BDC Response:**

The NPPF paragraph 83 states "Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes ... for storage and distribution operations at a variety of scales and in suitably accessible locations."

The Housing and Economic Needs Assessment Planning Practice Guidance Paragraph: 031 Reference ID: 2a-031-20190722 provides extensive advice on the approach that authorities should take in allocating land for logistics. This includes "logistics industry ... has distinct locational requirements that need to be considered in formulating planning policies (*separately from those relating to general industrial*

*land*.” And “ Strategic facilities serving national or regional markets are likely to require significant amounts of land, good access to strategic transport networks, sufficient power capacity and access to appropriately skilled local labour. Where a need for such facilities may exist, strategic policy-making authorities should collaborate with other authorities, infrastructure providers and other interests to identify the scale of need across the relevant market areas. This can be informed by:

- engagement with logistics developers and occupiers to understand the changing nature of requirements in terms of the type, size and location of facilities, including the impact of new and emerging technologies;
- analysis of market signals, including trends in take up and the availability of logistics land and floorspace across the relevant market geographies ...”

In the context of the above it is considered appropriate and justified that the requirement for a large scale logistics facility would be considered separately from the general local employment needs of the district.

The evidence and consideration of wider impacts are set out in the Bassetlaw A1 Logistics Assessment, 2021 [TI-014] and Bassetlaw A1 Logistics Assessment Update, 2022 [TI-016]. These documents provide the evidence for the site allocation, and are considered to be up to date.

TI-014 produces an assessment of the logistics market on the A1 corridor in Bassetlaw and the wider property market area, the latter defined as running from Doncaster and Sheffield down to Nottingham and Newark [Table 2.1 of TI-016]. The process of preparing TI-014 included engaging with a range of operators, developers and agents in the logistics sector. A range of market indicators were reviewed including rising rents, falling vacancy, low availability, high demand and an increasing number of deliveries driven by restructuring of the logistics market including increases in online retailing.

Supply is assessed across the whole property market area (Table 5.1 / Appendix A [of TI-014]) and compared with historic deliveries and take up across the same area. Balancing a projection of past deliveries and take up against current supply, indicates a range of supply of 8-12 years *including* the Apleyhead site or 6-9 years without it. This indicates that the scale of demand is such that the inclusion of the site is justified - as even with this site included there is less than a 15 year Local Plan period of supply. This also indicates that across the wider strategic area the impact would not be adverse, as the expectation is that demand will exceed the known supply.

TI-014 is further updated by TI-016: the Bassetlaw A1 Logistics Assessment Update, 2022. This updates the supply position reflecting additional sites coming into the supply pipeline both in Bassetlaw and across the wider property market area, notable in South Kesteven. This increases the overall supply; however, with the Apleyhead site it still sits below 15 years at a range of 9 to 13 years of future need (based on either take up or deliveries), without Apleyhead the supply falls to 8 to 11 years. It is the Council's view that the allocation has had appropriate regard to the potential wider strategic impact of the development.

The Duty to Cooperate Compliance Statement May 2022 [DTC-005] paragraphs 3.8-3.15 set out the approach the Council has followed to consider the potential wider strategic impact of the development. This includes the production of TI-014 and TI-016.

Confirmation that the potential wider strategic impacts have been appropriately considered is contained within the Statement of Common Ground for the property

market area, June 2022 [SCG-019] whereby the property market area authorities have reached agreement on the points identified by the Employment Land Topic Paper paragraph 3.31 [BDC-02].

- 3.4 Are the requirements of policies ST7 and Policy 9 clear, and would the criteria identified to assess proposals on these sites be likely to be effective? In particular:
- a) Is the requirement of 3(e) necessary and what does it seek to achieve?
  - b) Is there sufficient evidence to demonstrate that the site can be implemented and that all necessary infrastructure and mitigation measures required to support it are achievable and can be delivered?
  - c) What assumptions have been made in relation to the timescale for delivery and are these justified?

**BDC Response:**

The original intention of Part 3 e) was to ensure that Apleyhead as a strategic site allocation did not adversely impact upon the ability of neighbouring authorities to effectively implement their adopted Local Plans. However, in light of the Bassetlaw A1 Logistics Assessment [TI-014] and the Addendum 2022 [TI-016] the Council is of the view that the up to date evidence base along with the Statement of Common Ground [SCG-019] signed by authorities in the Property Market Area make this criteria less critical but non the less relevant. However, the Council, under Duty to Cooperate intend to discuss the inclusion of this policy criteria with partner authorities prior to the hearing sessions, to seek clarification on its inclusion.

The Infrastructure Delivery Plan 2022 [BG-041] Appendix 2 for site SEM001 identifies the necessary infrastructure being sought to mitigate identified impacts as a consequence of the delivery of Apleyhead. As evidenced, the necessary infrastructure relates to three categories: green infrastructure; highways and transport; and, utilities.

- Green infrastructure: Caddick Developments, the site promoters at paragraphs 5.3.2-5.3.4 [of SCG-015] state a full ecological assessment and survey work has been undertaken as part of the Environmental Assessment of the site. This work has informed the amount of proposed development in the draft allocation as well as the parameters for the application, including suitable mitigation and blue / green infrastructure for the site, including trees.

The southern boundary of the Site lies within 400m of the boundary of the Clumber Park SSSI and the Sherwood Forest ppSPA. Relevant assessments identified by Policy 9 have been evidenced by a suite of Local Plan evidence including the Habitats Regulations Assessment 2022 [PUB-026] and the Site Allocations Landscape Study 2020 [CD-008]. The site promoters state that these requirements; a project-level Habitats Regulations Assessment (including wintering birds and other necessary bird surveys); Air Quality Assessment and indicative management strategy, a Landscape Visual Impact Assessment and indicative Lighting Assessment to address identified potential effects upon the protected sites, has been prepared and will be submitted with the application, including the Environmental Statement.

- Highways and transport: In terms of transportation infrastructure, the position outlined in the Council's response to Inspectors Initial Questions [BDC-02] paragraphs 3.33-3.40 remains relevant.
- Utilities: paragraph 5.5.4 of SCG-015 states that there is 'in principle' agreement with utilities providers, in relation to connection to foul sewerage and the electricity grid.

As such, the Council considers that the requirements for Policy ST7 and Policy 9 (with modifications) provides a clear framework to guide the sustainable development of SEM001 over the Plan period. The policies are considered to be sufficiently flexible to allow for changes to be made and to allow for issues to be overcome that are unknown at the time of plan preparation. Additionally, the site allocation policy would be expected to be considered alongside other policies that address specific matters (as per Paragraph 1.15.1 of the Local Plan). As such, the policy provides clear, justified parameters within which a planning application would be considered, but expects the masterplan framework, associated documents and technical assessments to confirm the detailed approach.

Taking the above into consideration the site promoters Caddick Developments, at paragraph 3.3, in SCG-015, May 2022 state that the 'site is entirely deliverable in this plan period' and that the measures within Policy 9 are achievable.

The assumptions made in relation to the timescale for delivery are as per the Council's response to the Initial Inspector's Questions [BDC-02] paragraph 3.41-3.42. The assumptions are considered to be justified, in that the site promoters have submitted and received an EIA Scoping response; undertaken a pre-application consultation in November 2021-January 2022 and are working in parallel with the plan-making process in terms of submitting a planning application. At paragraph 3.42 [of BDC-02] the site promoters confirm 'there is active occupier interest in units of up to 1.2m sqft'.

As such the Council is of the view that there is sufficient evidence to demonstrate that the site can be implemented and that all necessary infrastructure and mitigation measures required to support it are achievable.

The Council is of the view that the provisions of Policy ST7 are clear and effective in relation to the general and larger unit employment sites, and also for the strategic employment site (subject to clarification sought with partners on part 3e) as above). The sites are considered deliverable in that all have planning permission, with necessary infrastructure and mitigation measures secured.

At the point of submission the employment land supply figures within Part 2 were considered up to date as of March 2022. However, as a result of ongoing monitoring and engagement with developer partners the Council considers a modification necessary to clarify the developable land position as of 31 October 2022. The justification for the proposed change to Carlton Forest is set out within Matter 6.

Reference	Site Name	Site Area (Ha)	Gross Available Employment Land (Ha)	Residual Employment Land (Ha) at 31 March 2022
<b>Sites with planning permission</b>				
EM001	Shireoaks Common	26.0	<del>7.5</del> 12.0	<del>7.5</del> 12.0
EM002	Symmetry Park	21.95	44.4-16.8	44.4-16.8
EM003	Explore Steetley	46.5	16.0	16.0
EM004	Welbeck Colliery	29.6	3.0	3.0
EM005	Carlton Forest	<del>40.6</del> 6.5	<del>40.6</del> 6.5	<del>5.0</del> 6.5
EM006	Trinity Farm	11.11	2.7	2.7
EM007	Snape Lane	80.9	80.9	<del>80.9</del> 43.5
EM008a	Former Bevercotes Colliery	80.0	43.0	43.0
EM008b	Manton Wood	24.6	<del>40.7</del> 10.8	<del>40.7</del> 10.8
<b>TOTAL</b>		<b>323.51</b>	<b><del>488.8</del> 191.7</b>	<b><del>483.2</del> 154.3</b>

3.5 In relation to policy ST10 is the policy based on up-to-date evidence and is the policy consistent with national policy?

**BDC Response:**

In July 2018, GL Hearn did the initial employment site assessments to inform a review of the existing and potential employment land in the district, in line with the methodology set out within the Housing and Economic Land Availability Assessment PPG. The employment sites were provided by the District Council, and included the main employment locations within the district (in Table 17 [of SS-010]). The outcome was reported in section 9 of the 2019 EDNA [SS-010].

At that time, GL Hearn recommended 23 sites ‘be protected for employment use, proposals for non-employment related development should be resisted.’ (Paragraph 9.7). 8 sites were considered to have ‘the potential to be developed to provide employment uses, should the need arise’. (Paragraph 9.12).

Between 2018 and the January 2020 Bassetlaw Local Plan [BG-006], the district’s active employment land supply had evolved. As such the Land Availability Assessment 2020 (LAA) [BG-020] updated the EDNA [SS-010] position and reported on additional employment sites that had been identified as suitable, developable or potentially developable. The LAA [BG-030] represents the most up-to-date assessment of employment sites.

All existing employment sites considered necessary to support the district’s economic strategy and that make general employment provision, were recommended for protection through the Site Selection Methodology 2022 [SS-025].

As such, the Council considers that Policy ST10 is based on up to date evidence; the position is summarised within paragraphs 3.6 – 3.14 of the Employment Land Topic Paper 2022 [BDC-02].

Paragraph 81 of the NPPF states that planning policies 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’. It is considered that by protecting the sites identified by Policy ST10 from non-employment uses, the policy approach is ensuring that local businesses can continue to operate or expand with confidence over the plan period.

Additionally, the NPPF paragraph 82 asks that the Plan ‘be flexible enough to accommodate needs not anticipated in the plan and to enable a rapid response to changes in economic circumstances’. Part 3 of Policy ST10 is considered to provide



an appropriate framework within which proposals for alternative uses can be considered should needs change over time.

As such, the Council considers that Policy ST10 is consistent with national policy.

- 3.6 In relation to policies ST11 and ST12, are the policies justified by appropriate available evidence, having regard to national guidance, and local context? Do the policies provide clear direction as to how a decision maker should react to a development proposal? In relation to camping, caravanning and chalets, do the proposals pay appropriate regard to the biodiversity impacts of such proposals?

**BDC Response:**

The EDNA - Part two, 2019 [paragraph 4.15 of SS-010] states that 'outside of the main settlements an ad hoc market led approach to employment development is considered suitable to respond to meet needs'.

In terms of the local context, the D2N2 Growth Recovery Strategy, 2021 [EX-002] (Guiding Principle 3, Connectivity and Inclusivity, p15) aims to make 'D2N2 the best-connected region, enabling people and businesses in rural and urban settings to reduce unnecessary travel and haulage...' and also aims to 'use our economic and skills investments in our cities, towns, rural areas and growth corridors to promote improvements in quality of life for residents, workers and visitors.' Additionally, the assessment [EX-002] (page13) recognises the disperse network of towns and adjacent rural economies and their contribution to key manufacturing sites, major employers and thriving small businesses.

The NPPF paragraph 84, states that planning policies should enable the sustainable growth and expansion of all types of business in rural areas, and should also enable sustainable rural tourism. Additionally, paragraph 85 of the NPPF asks that planning policies recognise that sites to meet local business needs in rural areas may have to be found adjacent to or beyond existing settlements and in locations not well served by public transport. It provides a number of circumstances that should be considered, but identifies that the use of previously developed land and sites that relate well to existing settlements be encouraged.

As such, it is considered that Policy ST11 is justified in its approach by local evidence, national policy and local context. The Policy identifies seven criteria which, in the Council's view, seek to promote a market led approach to sustainable economic development outside existing employment sites/allocation or in the rural area but which is 'sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits opportunities to make a location more sustainable' (as per NPPF, paragraph 85).

The policies are considered to provide clear direction as to how a decision maker should respond to a proposal. Part 1 of the policy clearly only applies to new and existing business developments in the rural area and outside established employment sites / allocations. The policy framework is supportive of such proposals subject to all the criteria being met. It is considered that Part 2 only applies to rural diversification proposals subject to the criteria in the policy being addressed.

In terms of the visitor economy and local context, the Nottingham Visitor Economy Strategy, 2019 [EX-001] aims to increase the number of visitors to 5 million and create

2900 full and part time jobs, generating £240 million (direct and indirect) to the economy by 2029. The strategy [EX-001] recognises the value of sustainable rural tourism (or green tourism) that respects the character of the countryside, can have in economic terms (page 11).

As such it is considered that Policy ST12 is appropriate in making provision for appropriate visitor attractions and accommodation as well as sustainable transport routes that provide links to attractions, to maximise the potential economic value the visitor economy can bring to the district and at a sub-regional scale.

Parts 1 and 2 of the policy apply to new development or the extension of existing tourism development including visitor accommodation, whilst Part 3 is supportive of tourism development, including visitor accommodation in rural locations subject to the policy criteria being met. Parts 4 and 5 cover tourist development for camping, caravanning, chalets, lodges and pods. The policy is therefore considered to provide clear direction as to how a decision maker should react to a proposal.

The Council considers that Policy ST11 and Policy ST12 in combination with other Local Plan policies provide a comprehensive and positive framework within which to consider the diversification and business growth that occurs in the rural area, including the rural estates in the district, support the positive re-use of heritage assets, supporting job growth and upskilling of residents as well as for housing needs. As such, the Council considers that a site-specific policy to meet individual owners' needs is not necessary.

Section 1.15 of the Local Plan, explicitly states that to avoid unnecessary repetition throughout the Plan, and to minimise duplication including with other policies and national policy, policies do not repeat strategic provisions outlined in policies elsewhere, and that the Plan and national policy should be read as a whole.

As such, in relation to the biodiversity impacts associated with camping, caravanning and chalets, the proposals would need to pay appropriate regard to Policy ST40 in addition to the criteria set out in ST12. If the principle of development is considered appropriate, the mitigation hierarchy set out in Part 2 (of Policy ST40) would be applied.

### 3.7 Are there any omissions in the policies and are they sufficiently flexible?

#### **BDC Response:**

The policy suite is considered comprehensive and deals with general and larger employment sites (ST7), strategic site SEM001 (ST7, Policy 9); Existing Employment Sites (ST10), Rural Economic Growth and Economic Growth outside Employment Areas (ST11), and the Visitor Economy (ST12).

Policy ST7 is considered to take a positive approach to planning for local employment needs by drawing on a gross completions trend which in itself includes some larger developments. It is therefore considered that this will enable a positive and flexible approach to enable the delivery of the allocations. ST10 and ST11 support employment existing and rural areas respectively as appropriate.

Policies ST10, ST11 and ST12 are considered to provide an effective framework to guide the provision of economic growth over the Plan period. The policies are considered to be supportive of growth as appropriate with each policy providing clear, justified parameters within which a planning application would be considered. They also are sufficiently flexible; Part 3 of Policy ST10 identifies the circumstances within

which change of use or redevelopment of all or part of an Existing Employment Site will be considered.

However, the Council considers it necessary to propose modifications to Policy ST12 and the supporting text, for consistency and to aid implementation effectiveness.

Part 2. ~~New facilities proposals~~, including visitor accommodation should be located in accordance with the sequential approach for main town centre uses in accordance with Policy ST13. ~~New or extensions to existing proposals development~~ should be of a scale that is in-keeping with local character and contributes to regeneration objectives where appropriate.

Part 3. New or extensions to existing proposals, including visitor accommodation in the rural area will be supported where:..."

Part 4. Where consistent with Part 3 above, new or extensions to existing sites for camping, touring and static caravans, and chalets, static lodges, and pods will be supported provided the development is adequately screened and it's scale is compatible with the surrounding landscape.

Part 5. Where consistent with Part 3 above, the diversification of existing touring caravan pitches to static lodges or pods sites for camping, touring and static caravans, chalets, static lodges and pods will be supported where the proposal supports the expansion of an existing business and is consistent with other policies in this Plan.

Paragraph 6.6.5 Visitor attractions (or tourism development as defined in the NPPF) ~~Tourism development~~, including cultural and leisure attractions, such as museums, galleries and hotels are defined by national policy as a main town centre use. So the provisions of Policy ST13 will apply. Where consistent with Policy ST13 and the provision is considered appropriate outside a town centre, new visitor attractions development should be located within or close to existing settlements, where access by sustainable and public transport is greater. This can maximise benefits to existing local communities, in terms of local employment but also by supporting local food producers, shops and pubs.

3.8 Are the Council's proposed modifications to these policies and the supporting text necessary for soundness?

**BDC Response:**

Modification M1.30 was proposed for clarification purposes to enhance the implementation effectiveness of the policy.

Modification M1.31 was proposed in response to representations receive by Fisher German in response to the publication local plan to clarify when the principles of the policy will apply. Therefore it is considered these changes are justified in order to produce an effective local plan and the modifications are necessary to enhance soundness.

Modification M1.32 was proposed as a factual change to delete reference to the Bassetlaw Garden Village, as a consequence of part of the site being withdrawn by one landowner in March 2022, to be internally consistent with Policy ST1 and the remainder of the Local Plan.