

Barton Willmore, now Stantec on behalf of Howard (Retford) Limited

Examination into the Bassetlaw Local Plan

Matter 11: Healthy Communities

Issue 11 - Does the Plan set out a positively prepared strategy and policies for healthy communities which is justified, effective and consistent with national policy?

Q11.1 Are the requirements in ST44(2) for all residential developments 50+ houses to submit a Rapid Health Impact Assessment Matrix justified and consistent with national policy?

1. Policy ST44 requires the submission of a Rapid Health Impact Assessment Matrix for all residential developments of 50 or more units. It is unclear what this threshold is based on and whether the submission of a Health Impact Assessment Matrix would illuminate any issues or pressures that would not already be addressed in other technical documents.
2. A threshold of 50 units is considered to be low and not justified. Other local authorities have been known to have a much higher threshold, with Halton Borough Council for example requiring a matrix with schemes over 200 units (Halton Borough Council Delivery and Allocations Local Plan (2022)). It is not clear what has informed the threshold of 50 units; a scheme of 50 units is not considered to have undue or significant impacts on existing infrastructure of surrounding communities – the Council should set out why a scheme of 50 units creates health pressures to an extent to warrant the submission of a health impact assessment matrix.
3. A Rapid Health Impact Assessment Matrix also largely results in the duplication of material that would be found in other planning application documents. The Council have not set out why a matrix is necessary over and above the documents that are already required to support a planning application submission.

Q11.2 Is the approach of protecting existing community facilities in ST45 justified and consistent with national policy? Will it be effective in both retaining valuable facilities and making effective use of land and buildings?

4. Our Client has no comment to make in relation to this question.

Q11.3

a) Are requirements in ST46 for the provision of open space on sites of 100+ dwellings and by other major residential developments justified by evidence and is the policy consistent with National Planning Policy Framework?

b) Are the proposed main modifications to supporting text needed for soundness?

5. Policy ST46 requires development of 100 dwellings or more to make provision for new open space on site unless it can be shown that it is not feasible or viable. This policy as supposedly been informed by the Open Space Assessment Update 2020 which sets out existing open space provision and where there are shortfalls.
6. Our Client welcomes a policy mechanism for securing the delivery of off-site provision, noting that it is commonplace for detailed justification to be provided where open space cannot be delivered on applicable sites.
7. However, the Policy is not sufficiently flexible where the provision of greenspace is likely to impact negatively on viability. Our Client considers that the Policy should include additional wording that

provides a mechanism for flexibility in the provision that a development is expected to deliver, should there be sensitivities relating to financial viability and deliverability. Such a requirement is particularly relevant where the Local Plan lacks up to date evidence to demonstrate where there are existing gaps in provision which would need to be met on-site.

8. In addition, it is not clear what has informed the threshold of 100 dwellings. This seems an arbitrary figure. The Council should set out clearly why a scheme of 100 dwellings would create additional demand for open space to warrant a policy requirement to either deliver open space on site or through a financial contribution.

Q11.4

a) Is the approach is protecting existing sport and recreational facilities in ST47 justified and consistent with national policy? Will it be effective in both retaining valuable facilities and making effective use of land and buildings?

b) Are the proposed main modifications to supporting text needed for soundness?

9. Our Client has no comment to make in relation to this question.

Q11.5 Are the proposed main modifications to Policy 49 and the supporting text needed for soundness?

10. Our Client has no comment to make in relation to this question.

Total Word Count (Excluding Questions): 486