



**Newark and Sherwood Publication Amended
Core Strategy (PACS) Pre-Submission
Consultation**

**Statement for Regulation 22(1) (c) (v) of the
Town and Country Planning (Local Planning)
(England) Regulations 2012 (incorporating
the Schedule of Modifications)**

September 2017

Publication Amended Core Strategy –Statement for Regulation 22(1) (c) (v)

1.0 Introduction

- 1.1 The Town and Country Planning (Local Planning) (England) Regulations 2012 prescribe the documents that a local planning authority should submit to the Secretary of State when preparing a Development Plan Document. This statement provides information on:
- I. The activity undertaken to invite people to comment on the Newark and Sherwood Publication Amended Core Strategy Pre-Submission version; and
 - II. The representations received by Newark and Sherwood District Council in response to the Newark and Sherwood Publication Amended Core Strategy pre-submission consultation held between 17th July and 1st September 2017
- 1.2 This statement sets out information on the number of representations made and a summary of the main issues raised in those representations. Individual representations are available to view on the Councils website by following the link: (<http://www.newark-sherwooddc.gov.uk/planning/localdevelopmentframeworkldf/publicationamendedcorestrategydpd/>)

2.0 How the pre-submission consultation on the Newark and Sherwood Publication Amended Core Strategy was publicised

- 2.1 The Newark and Sherwood Publication Amended Core Strategy Development Plan Document (DPD) was available for consultation during a prescribed period between 17th July and 1st September 2017. Consultation arrangements were undertaken in accordance with the Newark and Sherwood Statement of Community Involvement (Adopted 11th March 2015)
- 2.2 On publication of the DPD emails or letters were issued notifying all interested parties whose details were retained on the Council's consultation database of the period of consultation, with a web-link to the Publication Amended Core Strategy, Representation Form, Statement of Representation Procedure, Representation Guidance Note, Statement of Fact Notice, Regulation 18 Statement of Consultation and supporting evidence base documents being included.
- 2.3 A further email to all interested parties whose details were held on the Council's Inovem consultation database was issued on 4th August 2017 as a reminder of the consultation and deadline for making representation. Correspondence issued at both stages comprised individuals and groups as well as statutory consultees including:
- Specific consultation bodies (detailed in Appendix 1)
 - General consultation bodies (Contact details were exported from the Council's Inovem database which is kept up to date to ensure that individuals and groups that have

expressed an interest or made comment on Local Plan matters have been written to at each stage)

2.4 As part of the 6 week consultation on the Publication Amended Core Strategy the following actions were taken:

- The amended paper copy of the Publication Amended Core Strategy, (and a clean copy – i.e. one with the amendments included and the deletions removed), Policies Map Amendments, Representation Form, Guidance Notes, Statement of Representation Procedure, Statement of Fact Notice and Statement of Consultation were deposited at all District libraries and the Councils offices at Kelham Hall.
- District Councillors were notified by either email or letter and were also sent a Statement of Representation Procedure.
- Town and Parish Councils and adjoining Parish Councils were notified either by email or letter and were also sent a Statement of Representation Procedure.
- Press notices were made in the Newark Advertiser, the Mansfield Chad and the Nottingham Post.
- A dedicated web page was set up on the Council's web site where all consultation documents remained available. The web page included a link to the representation form so that forms could be completed and submitted directly online or alternatively the form could be downloaded and submitted by email or post. The webpage can be found by following the link at paragraph 1.2 of this statement.

3.0 Duly Made Representations

3.1 57 consultees made representations to the Publication Amended Core Strategy during the advertised consultation period and made 195 representations in total. A list of Representors is included in Appendix 2.

3.2 Table 2 sets out the number of representations by section and policy of the Publication Amended Core Strategy. Table 3 provides a detailed summary of the main issues raised by section and policy of the Core Strategy.

The most significant main issues are considered to be:

- Objections to the Spatial Strategy (including Spatial Policies 1 & 2 and Objections to the Objectively Assessed Housing Need (OAN). The matters associated with this main issue received the more responses than any other element of the DPD. Developers and their representatives challenge the methodology of the Nottingham Outer SHMA and the resulting OAN, believing for various reasons that the figure underestimates the level of housing required.
- Objections to Spatial Policy 3 Rural Areas. A number of local agents who acted for clients with interest in communities in rural areas felt that the amendments to

Spatial Policy did not go far enough. Two Parish Councils also made representations on the policy. In summary these are the three main issues:

- The ‘Location’ criterion – should not just focus development in the main built up area of villages but should allow development adjacent to it as well;
 - The ‘Scale’ criterion – should be a more precisely defined; and
 - The ‘Need’ criterion– the definition of need in relation to housing is not sufficiently clear to be implementable
- Objections Viability, Deliverability and Developer Contributions. A number of consultees were concerned that Spatial Policy 6, Core Policies 1, 9 and 10 could place additional burdens on developers, including by incorporating requirements within Supplementary Planning Documents rather than through development plan policies.
 - Objections to Core Policy 3 Housing Mix. A number of consultees were concerned that Spatial Policy 6, Core Policies 1, 9 and 10 could place additional burdens on developers, including by incorporating requirements within Supplementary Planning Documents rather than through development plan policies.

3.3 The District Council has responded to the main issues raised and in a number of circumstances in order to address these issued has proposed amendments to the DPD. These modifications fall into two categories, Main Modifications and Clarifications and Minor Amendments. Main Modifications are to ensure that the Plan is Sound, are made by the Planning Inspector. Clarifications and Minor Amendments have been proposed which would make the plan clearer and clarify its requirements. Contained in Appendix 3 is a schedule of such changes which the District Council is proposing to make to the Amended Core Strategy.

4.0 Late Representations

4.1 One representor made three representations that were received by the Council after the consultation deadline of the Publication Amended Core Strategy. The Planning Regulations make it clear that in law only responses submitted within the time frame specified by the Council may be considered duly made and forwarded to the Inspector. Those representations submitted outside the time frame do not have to be sent to the Inspector and fall to be considered. The Inspector may ask to see them but they cannot be considered duly made. This representation is identified in the table below:

Table 1: Late Representation

Main Issues	Number of Late Representations
Objectively Assessed Need	1
Spatial Distribution of Development	1
Spatial Policy 3	1

Table 2:

**Duly Made Representations Received During Pre-Submission Consultation on the Newark and Sherwood Publication
Amended Core Strategy (PACS)**

PACS Reference	Number of Representations										
	Total Received	Legally Compliant?		Complies with Duty to Cooperate?		Is the Plan Sound?		Reason for not Sound			
		Yes	No	Yes	No	Yes	No	Not Positively Prepared	Not Justified	Not Effective	Not Consistent with National Policy
Whole Plan											
	7	7		7		5	2	1	2	1	2
Chapter 1: Introduction											
Introduction	2	2		2			2		1	2	1
Chapter 2: Spatial Portrait of Newark and Sherwood											
Newark and Sherwood District	1	1		1			1	1	1	1	1
Newark and Sherwood Areas											
Key Issues and Challenges											
Chapter 3: Vision and Objectives											
Vision	1	1		1			1	1	1	1	1
Strategic Objectives	3	3		3			3	1	1	2	2
Area Objectives											

PACS Reference	Number of Representations										
	Total Received	Legally Compliant?		Complies with Duty to Cooperate?		Is the Plan Sound?		Reason for not Sound			
		Yes	No	Yes	No	Yes	No	Not Positively Prepared	Not Justified	Not Effective	Not Consistent with National Policy
Chapter 4: Spatial Policies											
Spatial Strategy											
SP1 Settlement Hierarchy	7	6	1	6	1	2	5	2	4	4	3
SP2 Spatial Distribution of Growth	25	24	1	24	1	1	24	15	23	19	15
SP3 Rural Areas	10	9	1	9	1		10	4	5	8	4
SP4A extent of the Green Belt	4	4		4			4	2	2	4	2
SP4B Green Belt Development	1	1		1			1	1	1	1	1
SP5 Delivering the Strategy	8	5	3	5	3	1	7	6	7	5	5
SP6 Infrastructure for Growth	6	6		6		3	3		1	1	1
SP7 Sustainable Transport	2	2		2			2			2	
SP8 Protecting	2	2		2		2	2			2	

PACS Reference	Number of Representations										
	Total Received	Legally Compliant?		Complies with Duty to Cooperate?		Is the Plan Sound?		Reason for not Sound			
		Yes	No	Yes	No	Yes	No	Not Positively Prepared	Not Justified	Not Effective	Not Consistent with National Policy
and Promoting Leisure and Community Facilities											
SP9 Selecting Appropriate Sites for Allocation	7	7		7		5	2			1	1
Chapter 5: Core Policies											
CP1 Affordable Housing Provision	7	7		7		2	5		1	4	2
CP2 Rural Affordable Housing											
CP3 Housing Mix, Type and Density	5	5		5		1	4	1	1	2	3
CP4 Gypsies & Travellers – New Pitch Provision	3			3			3		2	2	
CP5 Criteria for	5	5		5		1	4		1	4	1

PACS Reference	Number of Representations										
	Total Received	Legally Compliant?		Complies with Duty to Cooperate?		Is the Plan Sound?		Reason for not Sound			
		Yes	No	Yes	No	Yes	No	Not Positively Prepared	Not Justified	Not Effective	Not Consistent with National Policy
Considering Sites for Gypsies & Travellers and Travelling Showpeople											
CP6 Shaping our Economic Profile	2	2		2			2			2	1
CP7 Tourism Development											
CP8 Retail & Town Centres	5	5		5			5	1	2	2	2
CP9 Sustainable Design	5	5		5		2	3			2	2
CP10 Climate Change	3	3		3			3			3	
CP10A Local Drainage Designations	4	4		4		2	2			2	1
CP11 Rural Accessibility	3	3		3		1	2	1	1	2	
CP12 Biodiversity and Green	6	6		6		2	4		1	2	2

PACS Reference	Number of Representations										
	Total Received	Legally Compliant?		Complies with Duty to Cooperate?		Is the Plan Sound?		Reason for not Sound			
		Yes	No	Yes	No	Yes	No	Not Positively Prepared	Not Justified	Not Effective	Not Consistent with National Policy
Infrastructure											
CP13 Landscape Character	1	1		1		1					
CP14 Historic Environment	2	2		2		1	1				1
Chapter 6: Area Policies											
NAP1 Newark Urban Area	8	8		8		3	5	1	3	3	
NAP2A Land South of Newark	7	7		7		1	6		2	4	2
NAP2B Land East of Newark	2	2		2		1	1		1	1	
NAP2C Land around Fernwood	9	9		9		3	6		3	5	
NAP3 Newark Urban Area Sports and Leisure Facilities											
NAP4 Newark Southern Link Road	2	2		2			2			2	

PACS Reference	Number of Representations										
	Total Received	Legally Compliant?		Complies with Duty to Cooperate?		Is the Plan Sound?		Reason for not Sound			
		Yes	No	Yes	No	Yes	No	Not Positively Prepared	Not Justified	Not Effective	Not Consistent with National Policy
SoAP1 Role and Setting of Southwell	5	5		5		1	4			4	3
SoAP2 Brackenhurst Campus- Nottingham Trent University	2	2		2		1	1			1	
Nottingham Fringe Area											
ShAP1 Sherwood Area and Sherwood Forest Regional Park											
ShAP2 Role of Ollerton & Boughton	1	1		1			1	1	1	1	1
ShAP3 Role of Edwinstowe	4	4		4		2	2	1	1	1	
ShAP4 Land at Thoresby Colliery	13	13		13		8	5	1	2	4	1
MFAP1											

PACS Reference	Number of Representations										
	Total Received	Legally Compliant?		Complies with Duty to Cooperate?		Is the Plan Sound?		Reason for not Sound			
		Yes	No	Yes	No	Yes	No	Not Positively Prepared	Not Justified	Not Effective	Not Consistent with National Policy
Mansfield Fringe Area											
Glossary											
Appendix A: Glossary											
Appendix B: Strategic Framework											
Appendix C: Housing and Employment Figures											
Appendix D: Infrastructure	1	1		1			1			1	
Appendix E: Replaced Core Strategy Policies											
Appendix F: Monitoring of the Core Strat											
Policies Map Amendments	1	1		1			1			1	
Supporting Documents											
Integrated Impact	1	1		1			1				

PACS Reference	Number of Representations										
	Total Received	Legally Compliant?		Complies with Duty to Cooperate?		Is the Plan Sound?		Reason for not Sound			
		Yes	No	Yes	No	Yes	No	Not Positively Prepared	Not Justified	Not Effective	Not Consistent with National Policy
Assessment											
Habitats Regulations Assessment	2	2		2		2					

Table 3:

The Main Issues Identified from Pre-submission Consultation Responses

This table sets out the main issues raised by Publication Amended Core Strategy section and policy, during the prescribed period for the pre-submission consultation from 17th July to 1st September 2017. The Council’s brief response is also given to identify where no change is required or a minor modification to the plan is felt appropriate.

Main Issues	Council’s Response	Amendment Reference
Whole Plan		
(01) Central Lincolnshire Joint Planning Unit supports the approach taken in plan review, as does a member of the public Bassetlaw District Council has no issues or concerns at this stage.	Support noted	
<p>The Overall Document</p> <p>The respondent has some initial comments in regards the document as a whole. Principally the concerns relate to: -</p> <ul style="list-style-type: none"> • The Core Strategy is not sufficiently strategic in focus and fails to provide a clear strategic direction for the district. • We are concerned about the overall legibility of the document because it is unclear what is policy and what is supportive text and therefore it is difficult to determine which takes primacy. There also seems to be a significant amount of repetition between different spatial policies. • We would question whether it is justified and consistent to continue to progress a review of the Core Strategy. The NPPF paragraph 153 makes clear that LPAs should produce a Local Plan for its area and any additional DPDs should only be used where it is clearly justified. It is 5 years since the adoption of the NPPF and therefore we do not 	<p>The District Council refutes in the possible strongest terms that the Core Strategy is not strategic enough and doesn’t deliver a strategic direction or that it is not legible. Up until this point the review of the plan has been conducted concurrently however the single issue of a Gypsy & Traveller site has delayed the submission of the Allocations element of the plan. We believe that the plan is positively prepared and meets all the requirements of paragraph 157.</p>	

<p>consider it is justified to continue to progress a limited Core Strategy and a portfolio of separate DPDs. The Council should be looking to produce a comprehensive Local Plan in accordance with the provisions of the NPPF, which combines both strategic policy and allocations;</p> <ul style="list-style-type: none"> • The failure to comply with the ‘crucial’ requirements of paragraph 157 of the NPPF. <p>It is considered that a significant amount of work still needs to be done to make the Core Strategy sound. As it stands, the Core Strategy is:</p> <ul style="list-style-type: none"> • Not justified because is not based on a robust and credible evidence base, and is not the most appropriate strategy when considered against reasonable alternatives; • Not effective due to issues of flexibility; and • Not consistent with national planning policy. 		
<p>(02) Preference within national policy for a single Local Plan to be prepared.</p> <p>Clear justification for de-coupled approach lacking.</p> <p>Separation of strategic and non-strategic site specific elements away from one another unrealistic.</p> <p>Given the change in the housing requirement and plan period the de-allocation of sites and/or changing to phasing is necessary.</p>	<p>The preparation of a single Local Plan is highlighted as a ‘preference’, accordingly this does not rule out alternative approaches, and clear and robust justification has been highlighted to support the approach. Given that the previously identified preferred site to deliver the vast majority of the new gypsy and traveller pitches required is no longer realistically deliverable it is reasonable that the Authority should opt to ‘decouple’ the strategic and non-strategic parts of the review process from one another. Had this not been done then the risk of the whole plan, or at the very least an important part of it, being found unsound was clear.</p> <p>A revised and realistic timetable has been brought</p>	

	<p>together to ensure there is no delay in the submission of the amended Allocations & Development Management DPD and in the intervening period the Authority will be working proactively to pursue an alternative, deliverable location for gypsy and traveller accommodation. This provides clear and reasoned justification for the change in approach. Furthermore, the Housing White Paper has indicated that the government will remove the preference for the production of a single Local Plan.</p> <p>From a plan-making perspective there is no sound reason as to why the strategic and non-strategic site-specific elements of the review cannot be separated. Significantly the process concerns the review of an existing Development Plan, rather than the production of one afresh. The context within which site allocations will be reviewed has been clear and consistent from the outset. This is that unless sites are no longer deliverable they will not be de-allocated. Whilst the matters of OAN, and other land use requirements, along with the spatial distribution will be fundamental to the review of site allocations there is no reason as to why these matters can't be settled in advance. Any matters of phasing, where appropriate, can be reasonably dealt with at the site-specific stage.</p>	
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Chapter 1: Introduction		
Paragraph 1.4		
(01) Nottinghamshire County Council point out that the word 'requires' in the first sentence of this section has been changed to 'required' although the legislation referred to currently remains in force. They also suggest that it may be worth highlighting that the Directive is enacted through the Conservation of Habitats and Species Regulations 2010 (as amended).	The word ' required ' will be changed to ' requires ' in paragraph 1.4 of the Publication Amended Core Strategy. The Habitats Regulations Assessment refers to the Conservation of Habitats and Species Regulations 2010 being the UK's transposition of European Directive 92/43/EEC.	CMA/0001
<p>The respondent has concerns about the overall legibility of this section. We would suggest that this section is streamlined so that it provides a clear picture of the principal issues and opportunities within the district.</p> <p>The Spatial Vision fails to address local issues. This is clearly highlighted by the fact that the Spatial Vision is not consistent with the Spatial Portrait. For the Spatial Vision to be 'sound' it should;</p> <ul style="list-style-type: none"> • Recognise the need to tackle unemployment, the decline in the working population and deprivation particularly in the former coal mining communities; • Acknowledge the need to provide affordable housing and diversify the housing market. <p>The respondent is concerned about the overall effectiveness of the Objectives. We consider that the Strategic Objectives do not fully set out the issues that the Core Strategy needs to address.</p> <p>The objectives contain an undue emphasis on 'managing' growth and change. However equal emphasis should be</p>	The Council believes that the objections to the Spatial Portrait, Vision and Objectives are not correct. These elements should be taken as a whole, including the Area Objectives which support the Strategic Objectives. The Council believes that the Spatial Portrait adequately identifies the various key issues and challenges which face the district and then sets out a positive vision to address them. These are then supported by the Strategic Objectives and Area Objectives which have driven the development of the Plan Review.	

<p>given to meeting the housing needs of all the residents of the district, boosting the supply of housing, and maintaining and improving the vibrancy and sustainability of rural settlements in accordance with the NPPF and PPG.</p>		
<p>Paragraph 3.2 – Strategic Objectives</p>		
<p>Tarmac Trading Ltd. suggest that a new objective is added to the list of strategic objectives: 'To safeguard known mineral resources of local and national importance'. They also suggest that the Local Plan refers to the Nottinghamshire Minerals Local Plan (both existing and emerging), and that the Policies Map should identify Mineral Safeguarding Areas and Mineral Consultation Areas.</p>	<p>While it is not considered necessary to add a reference to the Minerals Plan or a new strategic objective, a new criterion is being added to Spatial Policy 9 in response to another representation from Tarmac Trading Ltd. Additionally, when the Allocations & Development Management DPD is reviewed, Development Management policies will be amended to be more explicit regarding impacts on minerals development.</p> <p>There are currently no Mineral Safeguarding Areas in Nottinghamshire – none are defined in an adopted Local Plan. The District Council is not required to display Mineral Safeguarding Areas and Mineral Consultation Areas on the Policies Map.</p>	
<p>Chapter 4: Spatial Policies</p>		
<p>Spatial Policy 1- Settlement Hierarchy</p>		
<p>(1) Ashfield District Council supports the proposals with SP1 to adopt the OAN housing figures.</p>	<p>Support noted</p>	
<p>(2) William Davies Ltd, the promoters of NAP 2B Land East of Newark support the Settlement hierarchy and particularly the identification of Newark Urban Area (including Newark, Balderton and Fernwood) as a Sub-Regional Centre at the top of the hierarchy and the focus for housing and employment growth in the District.</p>	<p>Support noted</p>	

<p>(3) 1 representor considers the current settlement hierarchy is inappropriate having regard to changes in local services and facilities and proposes an expanded hierarchy with Sutton on Trent lower down.</p>	<p>The Council does not agree with the alternative hierarchy. Sutton on Trent is still appropriately located within the Principal Villages tier and contains the features set out for that level.</p>	
<p>(4) 2 representations on behalf of developers feel it is important that sufficient development is allowed to come forward within the villages, as Newark & Sherwood is a predominantly rural District, so that they can meet their long term housing and employment needs and maintain their vibrancy and vitality. The hierarchy should be amended to redistribute some of the growth to more sustainable villages. 1 respondent specifically sites Walesby.</p>	<p>Policy SP1 individually identifies those settlements central to delivering the Spatial Strategy and clarifies that within the rest of the District, outside of the Green Belt, development will be considered against the sustainability criteria set out in Spatial Policy 3 Rural Areas. Spatial Policy 3 (as amended) will provide for additional development in sustainable locations at a scale appropriate to the particular community.</p>	
<p>Spatial Policy 2 – Spatial Distribution of Growth</p>		
<p>(1) Mansfield District Council support the proposal within SP2 to adopt the OAN housing figures</p>	<p>Support noted</p>	
<p>(2) A number of respondents note that the Housing requirement should be expressed as a minimum.</p>	<p>Agreed: The housing requirement is a minimum and should be referenced as such within the Amended Core Strategy. Amend the first sentence of para 4.17 to read: In seeking to meet the District’s Objectively Assessed Housing Need (OAN), the District Council must plan for <u>a minimum of 9,080 dwellings</u> over the Plan period. and the first sentence of the second paragraph of Policy SP2 as follows: The housing requirements for Newark & Sherwood District between 2013 and 2033 are <u>a minimum of 9080 dwellings</u>.</p>	<p>CMA/0002</p>
<p>(3) 11 respondents (from the Home Builders Federation and the development industry) question whether the</p>	<p>The LPA is now required to provide for its full objectively assessed housing need in accordance with</p>	

<p>housing requirement figure of 454 dwellings per annum correctly represents the Full Objectively Assessed Need figure as required by the National Planning Policy Framework, many citing the conclusions of the Farnsfield Appeal Inspector. (Appeal Ref No. APP/B3030/W/15/3006252).</p> <p>Respondents cite the following points in challenging the OAN:</p> <ul style="list-style-type: none"> • The publication of the 2014 Sub National Housing Population figures • Economic growth and housing provision misaligned • Affordable housing need and affordability ratios • Figure ignores previous under provision <p>One of them also questioned the appropriateness of the Housing Market Area.</p>	<p>the provisions of the National Planning Policy Framework. Figures in the Adopted Core Strategy where based on a “Policy on” distribution of growth as set out In the now abolished Regional Plan. In order to arrive at the FOAN the Council, alongside neighbouring Councils in the Housing Market Area commissioned a Strategic Housing Market Assessment which included a review of the appropriateness of retaining the HMA boundaries. This has been prepared by an experienced firm and in accord with current national guidance, using the relevant and most up to date official demographic projections available at that time as its starting point. The Council believe it is suitably comprehensive in its consideration of and conclusions on the full local needs for both market and affordable housing across the three constituent authorities (Ashfield BC, Mansfield BC and Newark and Sherwood DC). The Farnsfield Appeal Inspector dealt only with the specific information before her and notes that “The SHMA will be tested in due course as part of the development plan process and full details in relation to the HMA as a whole are not before me.”</p> <p>The 3 LPAs in the Nottingham Outer HMA have commissioned the Nottingham Outer Demographic Update Paper – May 2017 which concludes that the latest 2014 Household projections data does not appear to render the SHMA or the OAN as out of date. Any unmet housing need has been factored in to the calculations in the SHMA. The Adopted Core Strategy was based on “Policy on” distribution of growth as set</p>	
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	out In the now abolished Regional Plan, not a full assessment of housing need.	
(4) 1 agent questions the total contained within the table at paragraph 2.3 setting out that the Plan Review Preferred Approach Requirement (2013 – 2033) i.e. 8,807 appears to be at odds and lower to the SHMA Objectively Assessed Need figure of 9,080 dwellings between 2013 to 2033 – 454 dwellings per annum, identified as the preferred approach by the Council.	As Paragraphs 4.17 and 4.18 make clear a number of dwellings have already been completed, or have the benefit of planning permission in those areas not individually identified in the settlement hierarchy which means that only 8806 dwellings need to be allocated within the settlements central to the delivery of the Spatial Strategy. In addition, windfall development allowed under the criteria based provisions of Spatial Policy 3 Rural Areas will provide additional flexibility over and above this provision.	
(5) A number of developers and agents suggest that sufficient flexibility should be provided to ensure that Spatial Policy 2 does not prevent sustainable development from coming forward in those locations that can most clearly support it. The Local Plan should not seek to be so prescriptive in terms of the percentage splits between the settlements and instead, should provide guidelines for growth over the plan period. This approach should not seek to place a ceiling on the number of dwellings to be provided in each settlement (as Table 1 of Appendix C currently appears to indicate).One respondent specifically cites the opportunity for further development taking place in conjunction with existing strategic site allocations should be explicitly recognised in the policy.	The percentage splits are indeed a guide to show the levels of development planned for over the period. Figures are included in Appendix C, rather than in the Policy to provide a snap shot in time picture of what number of dwellings that percentage represents and what we must plan for. This does not rule out suitable windfall development sites within the settlement envelopes which could still be considered positively.	
(6) 4 respondents including the HBF note that all settlements can play a role in delivering sustainable development in rural areas so blanket policies restricting housing development in some settlements and preventing	The Council is satisfied that suitable development will be considered against the sustainability criteria set out in Spatial Policy 3 Rural Areas. Spatial Policy 3 (as amended) will provide for additional development in	

<p>other settlements from expanding should be avoided. Some believe there is an over emphasis on Newark and the SUEs and the distribution should be reconsidered to allow for a wider distribution of growth to allow the sustainable villages to grow during the Plan period. Another considers the most appropriate option is to increase the amount and proportion of growth within the lower order settlements (i.e. those outside of the settlement hierarchy) especially those with high levels of accessibility.</p>	<p>sustainable locations at a scale appropriate to the particular community.</p>	
<p>(7) Consider that the overall employment land requirement for the District and the target for Newark should be explicitly expressed as a minimum to ensure that the plan contains adequate flexibility to deliver its economic objective to develop a strong, sustainable economy that provides a diverse range of employment opportunities for local people.</p>	<p>Agreed. Amend Policy SP2, paragraph between the housing and employment tables, first sentence to read: The employment land requirement for Newark & Sherwood District between 2013 and 2033 <u>is a minimum of</u> 83.1 hectares.</p>	<p>CMA/0003</p>
<p>(8) It is noted that the Council is proposing Opportunity Sites which will be brought forward for development if identified as necessary through monitoring. The HBF is supportive of a reserve site policy approach. However the Council's monitoring as set out in Appendix F has no triggers which would bring forward the proposed Opportunity Sites. The HBF recommend that specific monitoring triggers are introduced.</p>	<p>With regard to the opportunity sites, given the uncoupling of the two elements of the Plan Review it will now be necessary to provide additional clarification on the contingency proposals. Agreed: Include a monitoring Indicator trigger and target in Appendix F for both policies SP2 and SP5 (See Appendix F proposed modifications) Add additional sentence at the end of Para 4.38 to read: Measures could include securing alternative sites for the existing use, granting Permission in Principle on brownfield sites, seeking Government funding to assist in the release of the site, consider purchasing the site on behalf of the Council's Development Company or</p>	<p>(See Appendix F proposed modifications) CMA/0005</p>

	Compulsory Purchase.	
<p>(9) The Nottinghamshire CPRE object to Edwinstowe being identified for regeneration because it will not be possible to achieve the growth envisaged by N&S sustainably or deliver the proposed strategy due to unresolved issues regarding how road traffic impact will be minimized or alternatives to car travel realized, and due to the acknowledged severe landscape impact of the proposed development at Thoresby Colliery.</p> <p>Alternatively, the agent for a major landowner within the area feels that the strategy does not identify sufficient growth to deliver the required regeneration and associated provide the critical mass to support Edwinstowe's facilitates and contribute to off-site enhancements to connectivity such as pedestrian links to the Country Park, the improvements to the Ollerton roundabout and, for example, interventions to foster modal shift towards non-car modes to access jobs and facilities. They request a new policy to facilitate the allocation and development of land to the north of current allocation Ed/Ho/2 (Land north of Mansfield Road) ant that policy should also spatially encompass all of Perlethorpe cum Budby to facilitate the future enhancement of the Country Park and linkages to complementary facilities at Thoresby Hall and Thoresby Park with the policy recognising how such enhancements can be enabled by development within the policy area.</p>	<p>The earlier than anticipated closure of Thoresby Colliery in July 2015 has had an impact on the Sherwood Area. The Sherwood Area objectives seek to encourage the regeneration and redevelopment of the former mining communities of the area. Identification of the site responds to a significant regeneration opportunity, and is considered to represent a sustainable location for growth. Allocation of a strategic mixed use scheme of a significant scale in the west of the District will balance the growth planned for the Newark Urban Area and as this level of development is above that which would be allocated to a principal village Edwinstowe has been changed to a Service Centre within the hierarchy and appropriately identified for regeneration. This site has been factored into the production of the Infrastructure Delivery Plan and other evidence base documents. However it is not considered either necessary or appropriate at this time to increase the level of development proposed in this area.</p>	
<p>(10) 1 Agent notes the Council has now sought to separate the Plan Review into two distinctly separate timetables with the Core Strategy Review advancing ahead of the Sites & Settlements Plan. By progressing the Core Strategy</p>	<p>It is the role of the Strategic element of the Plan to set out the requirement for the areas with sufficient allocations being made to reflect that requirement as a second stage. The un-coupling of the Plan does not</p>	

<p>Review ahead of the Sites & Settlements document the Council now seeks to constrain residential and employment development within Southwell before it has fully considered the options presented by my client and Southwell Town Council.</p>	<p>impact upon this process.</p>	
<p>(11) Spatial Policy 2 should also retain the 30% of overall growth being allocated to Service Centres and retain 15% of Service Centre growth being allocated to Southwell.</p>	<p>The Adopted Core Strategy allocated 20% of the overall growth to the Service Centres with 15% of the Service Centre figure being allocated to Southwell. The amended Core Strategy has raised the Service Centres to 30% of the overall growth with 10% of that being allocated to Southwell. Both of these figures equate to 3% of the overall growth being assigned to Southwell.</p>	
<p>(12) Collingham Parish Council note that Collingham has met its housing quota for the period, it is the only principal village in the district with an A road through the middle and all existing junctions onto the High Street are substandard therefore the plans for Collingham are not justified.</p>	<p>Noted. The requirement for Collingham is provided for within the existing commitments.</p>	
<p>(13) The Council has erroneously included 60 self-contained extra-care units consented in outline pursuant to the original mixed-use allocation Co/Mu/1 to arrive at a residual housing land requirement of minus 20 dwellings for Collingham. As a consequence of this apparent housing surplus, the Council has not considered it necessary to allocate additional land. However, the original mixed-use allocation Co/Mu/1 clearly comprises an allocation of around 80 dwellings only. My client cannot see how the same allocation carried forward can suddenly equate to 140 dwellings for the purposes of balancing the Council's</p>	<p>The term 'extra care accommodation' can be applied to a range of accommodation types intended to meet the needs of the infirm (primarily but not necessarily the elderly). These include 'assisted living', 'extra' or 'very sheltered housing', 'close care', 'continuing care retirement communities' and 'retirement villages'. Typically contracts can be purchased that allow the household to buy in escalating levels of domestic and personal care to suit the changing needs of the occupant(s). The use class (C2/C3) does not in itself determine whether extra care accommodation should</p>	

<p>books for the village.</p>	<p>be included in more general housing figures or for council tax / New Homes Bonus purposes. The definition for the purposes of determining whether a unit would generate an award under the New Homes Bonus, is the same for determining whether it would be subject to council tax. This hinges on whether it is a self-contained unit of accommodation. The DCLG definition of self-containment is where all the rooms (including kitchen, bathroom and toilet) in a household's accommodation are behind a single door which only that household can use. Since the New Homes Bonus is a grant paid by central government to local councils to reflect and incentivise housing growth in their areas it would be somewhat perverse if that housing growth could not count towards the housing requirement.</p>	
<p>(14) 1 agent proposes a revised settlement hierarchy, with more tiers of villages and an additional 12 settlements with an alternative approach to the distribution of development put forward.</p>	<p>The Council does not agree with the alternative hierarchy which would result in housing requirements of just over 1 and 2 dwellings in those villages assigned smaller percentages of growth. This level of growth is more appropriately accommodated through the provisions of Spatial Policy 3 Rural Areas as amended.</p>	
<p>(15) 1 agent objects to the assumption that the existing site allocations in the current Site Allocations DPD remain appropriate as it is pre-determining the requirement to reconsider all outstanding site allocations. Reducing the focus of growth on the Newark Urban Area undermines the focus of delivering the proposed sustainable urban extensions. The reduction from 70% of growth to 60% of growth is inappropriate.</p>	<p>As part of the whole Plan Review process further work on the suitability and deliverability has been undertaken and fed into the Amended Core Strategy production alongside work on both the IDP and the Cil. The introduction of the strategic allocation at Thoresby Colliery has enabled the percentage reduction in the overall housing provision in the Newark Urban Area to reflect the longer than expected lead in times for the</p>	

<p>Whilst the inclusion of a strategic site is supported at Thoresby Colliery in principle the re-adjustment from Newark to Thoresby is not appropriate as it could lead to additional development pressure on the villages of the wider Newark Area. A re-distribution of housing in the western part of the District should be pursued rather than a re-allocation from Newark to Thoresby Colliery.</p>	<p>Strategic Sites. If the speed of delivery of the housing improves beyond that anticipated, further housing land can be brought forward from beyond the plan period, on sites that are already deemed sustainable and suitable in principle for development.</p>	
<p>(16) Questions are raised regarding delivery of sites identified in the 5YLS, with specific reference to Collingham and the strategic sites at Fernwood and Thoresby, and a site to the South of Mansfield Road Farnsfield is promoted for inclusion as a residential allocation.</p>	<p>The Council is satisfied that it can demonstrate a robust 5 Year Land Supply.</p>	
<p>(17) 1 agent objects to the Council's approach to the quantum and distribution of housing in Clipstone believing the new OAN should have resulted in the requirement for additional housing site(s) in Clipstone. The Council has instead however reconfigured its distribution percentages to facilitate the regeneration of Thoresby Colliery in Edwinstowe at the expense of continued sustainable growth in the District's other sustainable settlements. As a consequence, the Council is relying on the residual housing (and employment) needs of Clipstone being met by the delivery of a very difficult/sensitive site – Clipstone Colliery where, owing to the listed status of the pit stacks, the site shows no signs of progressing on a viable basis to date despite significant efforts by various parties.</p>	<p>The Adopted Core Strategy allocated 20% of the overall provision to Service Centres and 30% of Service Centre provision to Clipstone (or 6% of the total provision). The amended Core Strategy allocates 30% of the overall provision to Service Centres and 25% of Service Centre provision to Clipstone (or 7.5% of the total provision). This is a greater percentage of the overall requirement than was previously allocated to Clipstone but since the overall requirement is lower this results in a lower requirement. The Clipstone Colliery site allocation was always anticipated to be developed towards the end of the Plan period and the regeneration of this former colliery site is an important part of the development strategy for the Service Centre.</p>	
<p>(18) One respondent believes more development should be directed to Rainworth rather than Clipstone and</p>	<p>The regeneration of the colliery sites in both Clipstone and Edwinstowe present significant opportunities for</p>	

Edwinstowe.	mixed use developments which will bring benefits to the areas without the need to remove land from the Green Belt.	
(19) One respondent believes more development should be directed to Blidworth rather than Bilsthorpe. Another believes the Plan to be unsound as it fails to meet the level of development assigned to Blidworth on the Adopted Core Strategy and those sites which are allocated are not deliverable. The Council are seeking to amalgamate the shortfall for Blidworth to that across the District, principally to Newark, thereby “sweeping the problem of under-delivery under the carpet”. Suggested ‘over-provision’ in Newark will not assist with additional affordable housing provision required in Blidworth.	Blidworth is a village set within the Green Belt, to allocate more development here would necessitate a review of the Green Belt which is not being undertaken as part of this Plan Review. The Representor believes that there were shortcomings in the previous process of site allocation however this misrepresents the process that was undertaken. Clearly the parameters for the review were set out and endorsed by the Inspector as part of the Core Strategy and then a detailed assessment of Green Belt land was undertaken as part of the allocations process. In doing this the combination of technical site suitability, and suitability to release land under the purposes of the Green Belt was considered. As the level of development originally identified for Blidworth could not be accommodated due to Green Belt constraints sufficient provision was made elsewhere within the District and the as part of the Amended Core Strategy the settlement hierarchy distribution has been appropriately amended.	
(20) A number of respondents are promoting specific sites for allocation in the following villages: <ul style="list-style-type: none"> • Clipstone • Collingham • Farnsfield 	Site submissions do not form part of the Amended Core Strategy and will be considered as part of the Amended Allocations & Development Plan DPD in due course.	
Spatial Policy 3 – Rural Areas		
(01) A number of representors identified the ‘Scale’	In relation to the definition of small scale it is not	

<p>criterion of the policy needed to clearly define what scale is appropriate.</p>	<p>possible to provide an absolute definition for all settlements because this policy covers a large number of accessible villages with local services, some large, some small, therefore an arbitrary definition is not thought to be appropriate. For those settlements which are 'well related' to accessible villages we have defined new development as up to two dwellings.</p>	
<p>(2) A number of consultees who represent developers and landowners believe that the criterion relating to location is too restrictive by seeking new housing development only within the main built up area of villages.</p>	<p>In relation to not allowing housing development beyond the main built up areas of villages, the Council believe as currently written this is a sound basis for this policy reflecting local concerns. Furthermore the policy does allow for regeneration of farms and other building and Core Policy 2 Rural Affordable Housing allows for exceptions schemes. The supporting text is clear that if Parishes do wish to define their village's main built up area through a Neighbourhood Plan or Village Design Statement that the Council would be supportive.</p>	
<p>(3) A number of consultees believe that the amendments to the need criteria do not provide enough clarity and that the need criterion and supporting text are not currently effective.</p>	<p>With regard to need, the Council agrees that further clarification should be provided. It is clear that the term 'need' and what flows from this policy needs to be clear both to potential applicants and decision makers.</p> <p>It is proposed to amend the Need Criterion accordingly:</p> <p><i>Need</i> - Employment and tourism which requires a rural/village location <u>are sustainable and meet the requirements of the relevant Core Policies.</u> New or</p>	<p>MM/0001</p>

	<p>replacement facilities to support the local community. Development which supports local agriculture and farm diversification. New housing where it helps to meet identified proven local need <u>support community facilities and local services. Neighbourhood Plans may set detailed policies reflecting local housing need, elsewhere housing schemes of 3 dwellings or more should meet the mix and type requirements of Core Policy 3. and reflects local need in terms of both tenure and house types;</u></p>	
Rural Areas - Para 4.26		
	<p>4.26 <u>The Council considers that in locations with local facilities and services, additional development can support their continued existence. Limited Development within the setting of this policy requires applicants to demonstrate the services it will support. The policy makes provision for detailed policies in Neighbourhood Plans to set policies on local housing need (including mix and type. Elsewhere for larger schemes (i.e. for those of 3 or more dwellings) the Council expects new development to satisfy the mix and type requirements of Core Policy 3. It is recognised that for schemes of one or two dwellings it will not be possible to require a particular type or mix of dwellings.</u></p> <p>and the housing need within the area. As with all planning policy, Spatial Policy 3 is intended to serve the public interest rather than that of individuals and consequently the requirement to reflect local need in relation to new dwellings to which it refers must be that of the community</p>	<p>MM/0002</p>

	<p>rather than the applicant. It is accepted that the two may align where, for example, a lack of a particular type of housing in a community also reflects the needs of an applicant. The Policy is not intended to cater for individuals desire to live in particular locations or in particular types of accommodation, beyond those exceptions identified in national and local planning policy. The Council has conducted a detailed assessment of the types of housing needed within different parts of the district and applicants should refer to this for guidance. Neighbourhood Plans may also set out more detailed policies on local housing requirements.</p>	
<p>Spatial Policy 4A – Extent of the Green Belt</p>		
<p>Three representors (who have interests in land in Green Belt settlements) believes that there where shortcomings in the previous process of site allocation, in that not enough sites where allocated and that a number of sites are undeliverable. They believe that a review of the Green Belt should be undertaken to accommodate additional sites</p>	<p>An essential characteristic of the Green Belt is its permanence, with boundaries only being altered in exceptional circumstances, through the Development Plan process. In reviewing boundaries there is the expectation that regard shall be had to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period. Taking account of this, the fact that the proposed new plan period (2013 – 2033) overlaps with the existing (2006 – 2026) and that Green Belt boundaries were only recently amended, in 2012, the Council does not consider any further review as appropriate or necessary.</p> <p>The Representor believes that there where shortcomings in the previous process of site allocation</p>	

	<p>however this misrepresents the process that was undertaken. Clearly the parameters for the review where set out and endorsed by the Inspector as part of the Core Strategy and then a detailed assessment of Green Belt land was undertaken as part of the allocations process. In doing this the combination of technical site suitability, and suitability to release under the purposes of the Green Belt was considered and in those circumstances that sites where allocated. To be clear the Council can more than accommodate its required housing requirement without recourse to land in the Green Belt.</p>	
<p>Spatial Policy 5 – Delivering the Strategy</p>		
<p>(01) Treatment of Sustainable Urban Extensions (SUEs) within the policy and supporting text was raised by three Responders.</p> <ul style="list-style-type: none"> • 1 responder felt that details of SUE delivery needed to be provided • 1 responder felt that the Council should not rely solely on the SUEs for housing delivery • 1 responder felt that another strategic employment site (in their client’s ownership) should be allocated in the policy. 	<p>Noted – this refers to the phasing requirements that are set out in NAP2A/B/C and ShAP4. Such phasing requirements, given their close relationship with detailed infrastructure delivery will be agreed as part of any planning permission.</p> <p>As set out at 4.31 in the Amended Core Strategy the SUEs are part of a wider strategy for delivering growth in the District; they an important part but not the only part.</p> <p>The Council does not intend given, the diverse employment land provision currently available in Newark Urban Area to allocate an additional strategic employment allocation.</p>	
<p>(02) 1 responder questioned the location of the</p>	<p>Noted – given the uncoupling of the two elements of</p>	

opportunity sites	the Plan Review details of the Opportunity Sites will be included within the Amended Allocations & Development Management DPD.	
Spatial Policy 6 – Infrastructure for Growth		
(01) On the basis that the District Council has set out its infrastructure needs in the revised Infrastructure Delivery Plan Nottinghamshire County Council considers that the plan is deliverable and sound in this respect.	Support noted	
(02) Anglian Water supports the amended wording of SP6.	Support noted	
(03) 2 responders raised concern that Spatial Policy 6 should not be used to add financial burdens without appropriate testing.	Noted – the Council has undertaken a whole plan viability assessment as part of the Plan Review and CIL Review process.	
(04) 1 responder questioned how the provision of improvements to the bus network could be achieved if not delivered through CIL. They also questioned how the sustainable transport measures within the policy would be delivered.	Noted – the delivery of significant new infrastructure in relation to public transport, relates to primarily to the 4 strategic sites. With each of these sites service provision and/or infrastructure provision has been secured as part of the consideration of the planning applications. For most other development public transport infrastructure provision which has been secured relates to the provision of bus stop/shelter infrastructure which has been secured on a site by site basis.	
Infrastructure –Education Para 6.19		
The Education Funding Agency welcomes reference to the development of a free school at Fernwood, but queries the reason for the deletion of the former para 20 stating that the free school would be funded by the Community	Noted – this paragraph has been replaced by the new paragraph 6.19 which makes clear that the new Suthers School will be funded by ESFA not be CIL monies.	

Infrastructure Levy (CIL)		
Spatial Policy 8 – Protecting and Promoting Leisure and Community Facilities		
(01) The Theatres Trust supports the policy with the recommendation of greater focus on community need rather than viability.	No amended wording recommended the policy sets out the criteria required to demonstrate the appropriateness to retain or allow a change of use of a community facility that includes evidence of marketing to retain its continued existing use. ‘Community need’ is clearly set out at bullet point 3. If the use can no longer be demonstrated as feasible the District Council does generally not have the power to resist its loss. This is therefore a matter beyond the scope of the Core Strategy.	
(02) Improvement of existing bus networks and infrastructure should be included within the definition of strategic infrastructure and are necessary to support growth. In order to work effectively such improvements need to be delivered on a district-wide basis.	The Authority is comfortable that its definition of what constitutes strategic infrastructure, and so by implication which improvements will be funded via the Community Infrastructure Levy, is appropriate. Given the viability implications it has been necessary to restrict strategic infrastructure to that without which growth could not occur, and which the requirement for stretches beyond any one individual site. Beyond this other forms of infrastructure will be delivered through a combination of planning obligations, developer contributions and where appropriate funding from the District Council. Improvements to bus networks and infrastructure are, where deemed necessary, perfectly capable of being funded through such mechanisms and indeed this has occurred in the past.	
Spatial Policy 9 - Selecting Appropriate Sites for Allocation		
(01) Historic England welcomes the revisions made to	Support noted	

policy SP9 and has no outstanding issues.		
(02) Natural England welcomes the revised wording of point 7.	Support noted.	
(03) Tarmac Trading Ltd. emphasise that the Plan should safeguard the District's mineral resources, and also seek to safeguard current and active workings. They suggest that new wording is added to Spatial Policy 9 to further these aims.	Some new wording will be added to Spatial Policy 9 in the interests of safeguarding mineral development. New wording similar to: 'The allocation of sites for development will not lead to the sterilization of known mineral resources as defined within the Minerals Local Plan' will be added to Spatial Policy 9.	MM/0003
(4) Tarmac Trading Ltd. argue that mineral safeguarding and consultation areas should be identified, and if necessary mineral/resource impact assessments should be carried out. They state that it is likely that the future Minerals Local Plan will have specific safeguarding policies and define more specific consultation areas.	The Minerals Local Plan and the identification of mineral safeguarding and consultation areas is the responsibility of the County Council.	
(5) Locating existing mineral operations on the Policies Map will ensure that sites for new development are not proposed in proximity to active workings which may sterilise operations by causing a conflict of land uses.	Although it is not considered necessary to alter the Policies Map, it is intended that development management policies will be amended to be more explicit about the safeguarding of mineral resources. Policy DM5 states that development proposals should have regard to their impact on the operation of surrounding land uses.	

Chapter 5: Core Policies		
Core Policy 1 –Affordable Housing Provision		
(01) 2 representors (a developer and an Agent) support the flexibility of the wording of the policy.	Noted	
(02) 2 representors believe that the policy should require developers to prepare a comprehensive site brief which includes where affordable housing is located	The Council does not believe that this is a proportionate approach. The location of affordable housing is agreed as part of the Section 106 Agreement in any event.	
(02) 1 representor asks that the Council confirm that Table at 5.10 relates to affordable housing only	Noted this is indeed the case it is proposed to include a title to Table 3 to clarify that this relates to Affordable Housing. Insert at 5.10 after Table 3 “Affordable Housing Bedroom Requirements”	CMA/0007
Core Policy 3 – Housing Mix, Type and Density		
(1) The Home Builders Federation support the approach to self-build and custom build as set out within the policy.	Support noted	MM/0004
(2) Paragraph 5.13 indicates a housing mix split of 50% 1 or 2 bed dwellings and 50% 3 bed and above is required. Exclusion of family housing of 3 bedrooms or more from the policy will only partially meet identified housing needs	The policy content responds to recommendations from the Housing Needs & Market Study (2014), and draws on demand evidence from over 9,000 households across the study area. Appropriate safeguards over localised housing need, information and viability have been included within the policy. Taken as a whole the policy is not prescriptive over mix, and allows for flexibility.	
(3) Policy needs to respond to demand (commonly for larger dwelling types) as opposed to ‘need’.		
(4) Prescriptive approach to housing mix and type advised against, greater flexibility required.		
(5) Favouring of smaller units fails to meet the requirement in national policy to plan for a ‘wide choice’ of homes.	Market appears to have no issue in submitting initial schemes which place an emphasis on 3 plus bed units, but schemes including a significant element of smaller	

	<p>unit types (2 beds or less) are rarer and are often the result of protracted negotiation. Policy seeks to place an emphasis on smaller unit types in the knowledge that they will inevitably form part of a broader mix including a significant proportion of 3 bed plus units. It is considered that the policy as amended provides a sound and appropriate basis for negotiations around housing mix to take place, but that this emphasis could be made clearer.</p> <p>Amend third paragraph to read: The District Council will seek to secure new housing development which adequately addresses the housing need of the District, namely <u>including but not limited to:</u>'</p>	
<p>(6) Further flexibility required over density, encouraging higher densities in certain locations (e.g. Newark). Enabling sites to respond to site specific features and reflect densities in the locality.</p>	<p>Considered that policy already achieves this through allowing for densities below the levels identified being able to be justified, taking into account individual site circumstances.</p>	
<p>Core Policy 4 – Gypsies and Travellers –New Pitch Provision</p>		
<p>(01) Support for the expansion of existing and provision of additional pitches should be restricted to locations within, or around the Newark Urban Area. Should be a strong presumption against small unrelated sites distributed across the District.</p>	<p>The policy approach places an emphasis on the Newark Urban Area as the location for meeting gypsy and traveller accommodation needs over the plan period, and the balance of recent permissions is recognised within the policy and supporting text. It is considered appropriate, and consistent with how other forms of new development have been planned for, to broaden this out in line with the spatial strategy in those circumstances where needs cannot be met within or around the Newark Urban Area. Doing so would continue to support a sustainable pattern of</p>	

	<p>development, and along with the safeguards contained in Core Policy 5 ensure that traveller sites are sustainable economically, socially, and environmentally in accordance with the Planning Policy for Traveller Sites.</p>	
<p>(2) Environment Agency objections raised on flood risk grounds, with reference to national policy, on the approach to future pitch provision at Tolney Lane, Newark. Gypsy and traveller accommodation should not be permitted in Flood</p> <p>Zone 3. Notwithstanding this acknowledgement is provided that the Authority has sites benefitting from historic permissions and there may be circumstances where it may be minded to approve extensions.</p> <p>Do not however see how other material considerations may outweigh flood risk given that flooding is one of the only material considerations that carry genuine risk to life and property.</p>	<p>Approach to additional pitch provision in areas subject to flood risk has been guided by a significant planning appeal decision on Tolney Lane, Newark. Where the Planning Inspector granted temporary consent to cater for the applicants immediate accommodation needs whilst the possibility of identifying other sites at lesser flood risk was explored.</p> <p>Importantly the amended policy places an emphasis on the nature of any consent granted in these circumstances usually being temporary in nature. The wider context provided by Core Policy 4 is one where the District Council will, through all necessary means, address gypsy and traveller accommodation needs (including through the purchase of land) with a focus placed on the Newark Urban Area. This future pitch provision will be secured in line with Core Policy 5, which falls back to the sequential and exception tests to ensure that flood risk is appropriately addressed.</p> <p>On this basis it is accepted that for this provision to be acceptable it would need to be located outside of Flood Zone 3, and so be at lesser risk than Tolney Lane presently is. The availability of pitches in areas at lesser flood risk would weigh heavily against proposals</p>	

	located in areas at greater risk.	
Gypsies, Travellers and Travelling Showpeople Paragraph 5.15		
	Amend: <u>Through the Gypsy and Traveller Accommodation Assessment (June 2016) (GTAA) a need for 40 pitches has been identified between 2013 - 2028. As a result of permissions having been granted since 2013, 28 additional pitches need to be provided over the rest of the GTAA period.</u>	CMA/0008
(3) Core Policy 4 should refer to the need to secure 40 pitches being a minimum requirement.	Agreed: Amend third paragraph to: The Council will secure 40 pitches to meet <u>the</u> identified <u>minimum</u> need over the period of the current GTAA as follows:'	CMA/0019
Core Policy 5 - 'Criteria for Considering Sites for Gypsies & Travellers and Travelling Showpeople'		
Criterion 1 – should make explicit reference to village Conservation Areas.	Issue is already covered by the reference to 'important heritage assets and their settings', it should also be noted that Conservation Areas do not only fall within villages.	
Criterion 1 - should set 'significant' loss, or adverse impact as the policy test.	'Loss' and 'adverse impact' provide appropriate policy tests. It is not clear what 'significant loss' would actually constitute.	
Criterion 4 – the content covering rural and semi-rural locations should be deleted.	Distinction is viewed as appropriate with respect to amenity given the different environmental characteristics between rural and urban locations.	
Criterion 9 – Need for criterion questioned, particularly the reference to temporary permissions.	Tolney Lane is subject to severe flood risk constraints and given its status as the main focus for gypsy and traveller accommodation within the Newark Urban Area it has been necessary to develop a policy	

	<p>approach to guide future development in this location. In terms of additional pitch provision this has been guided by a significant planning appeal decision, where the Planning Inspector granted temporary consent to cater for the applicants immediate accommodation needs whilst the possibility of identifying other sites at lesser flood risk was explored. In this respect the criterion provides a balance between management of flood risk and where appropriate meeting the immediate accommodation needs of the community</p>	
<p>Core Policy 6 – Shaping our Employment Profile</p>		
<p>Southwell Town Council, and a Town Councillor, comment that employment and housing sites, and the traffic that they generate, should be separate.</p> <p>They also say that it should be ensured that housing sites are not isolated by the location of new employment sites.</p>	<p>Noted</p>	
<p>Core Policy 8 – Town Centres and Retail</p>		
<p>(01) Proximity of Land around Fernwood to the A1 presents a specialist opportunity (beyond local need) that cannot be delivered within Newark Town Centre (due to scale of the operator requirement and/or their specific locational requirements). Policy could be amended to support such opportunities, but with sequential and impact test caveats.</p>	<p>Not considered necessary to include additional content to support ‘specialist opportunities’ at Land around Fernwood or South of Newark. National policy and Core Policy (as amended) would be supportive where proposals intended to meet this kind of opportunity are able to satisfy the sequential and impact tests. The proposed modification would largely replicate national and local planning policy.</p>	
<p>(02) Land South of Newark (LSoN) is the most appropriate location to provide the early delivery of a large foodstore or superstore. Policy should be amended to reflect this.</p>	<p>Response provided in NAP2A summary.</p>	
<p>(3) Scale of new convenience retail development to the</p>	<p>The wording is considered consistent with national</p>	

<p>south of the Newark Urban Area being sufficient to meet the needs generated by population growth is objected to. Need is not a retail policy test included within national policy, the sequential and impact tests should be relied upon.</p>	<p>policy. The amended policy approach seeks to ensure that the needs for convenience retail over the plan period will be met in full and not be compromised by limited site availability, as per paragraph 23 of the NPPF. 'Needs' is the exact terminology used within the Framework in this context. The TC&RS has shown forecast convenience retail requirements to be driven by population growth, and so on this basis the wording is considered appropriate.</p>	
<p>(4) Requirement for the development of new centre's to not 'harm' the vitality and viability of exiting centre's objected to. Appropriate policy test is 'significant adverse impact'.</p>	<p>Agreed:</p> <p>It is considered important that the introduction of new centres has regard to the likely impact on the hierarchy of existing centres. The policy can however be amended in a way which ensures that this will occur whilst also addressing the issue raised.</p> <p>Amend 9th bullet point to read:</p> <p>'Ensure that the development of new centres consolidates and enhances the hierarchy of centres and does not harm <u>with the likely impact on the vitality and viability of</u> existing centres <u>being appropriately assessed</u>; and"</p>	<p>MM/0006</p>
<p>(5) Development within a Centre should not be subject to the sequential and impact tests.</p>	<p>Inclusion of the sequential and impact tests as requirements for how proposals to meet future convenience retail needs, at either Land around Fernwood or Land South of Newark, should be considered remain appropriate.</p>	

	<p>It is possible that such proposals may ultimately be submitted in locations beyond the defined centre, and so it would be reasonable to consider sequential appropriateness in such circumstances. Where the proposal is located within the centre then the test would be considered not applicable.</p> <p>The impact test requirement is intended to ensure that the likely impact of new convenience retail provision is acceptable, in terms of its impact on the vitality and viability of existing centres. In this respect it should be recognised that the Newark Urban Area contains a diverse range of Centres (from Newark Town Centre to the smaller Centre's in Balderton, Land around Fernwood and Land South of Newark) and it is important that their vitality and viability is maintained. The policy doesn't set a specific floorspace figure, being left intentionally flexible in response to the nature of forecast capacity (i.e. driven by population growth). Accordingly impact will be the key determinant over what scale of provision is appropriate, and when it can be accommodated. The matter of impact is clearly material, and so its inclusion as a requirement is justifiable and reasonable.</p>	
<p>(6) An approach to address exposure to takeaway food outlets should be considered at they are linked with marginally higher consumption of takeway food and associated health concerns. This would tackle concentration/ clustering, hours of operation and healthy eating options.</p>	<p>Amending Core Policy 8 to address this issue is not viewed as appropriate. The representor has not supported the suggestion with a copy of the evidence referred to, and in any case this seems to suggest that the links referred to are 'marginal'. Accordingly the suggested approach would not appear justified and</p>	

	indeed would be overly-prescriptive.	
Core Policy 9 – Sustainable Design		
(01) Persimmon Homes supports the majority of CP9 and the removal of the requirement for life-time homes.	Support noted	
<p>(02) The Home Builders Federation state that Supplementary Planning Documents (SPDs) are referred to throughout the Core Strategy, including Core Policy 9. They say that SPDs should not contain ‘hidden’ development management policies or impose financial ‘burdens’.</p> <p>They conclude that the District Council should not impose any higher optional accessible / adaptable homes standards in an SPD and that any requirements for lifetime homes, broadband connections and water management should be viability tested.</p>	<p>Noted</p> <p>Paragraph 154 of the NPPF states that an SPD should not unnecessarily add to the financial burden of development. The Council does not believe that this is the intention or effect of the policies and their provisions. Core Policy 9 and its requirements have been tested as part of the Whole Plan Viability Assessment and any SPD will provide details on implementation of this policy only, not new policy. It is proposed to produce a Sustainable Design SPD, however this will be a guide for new development and encourage improved building performance, not require it.</p>	
<p>(03) Southwell Town Council, and a Town Councillor, comment that it appears that developers are able to avoid fulfilling obligations such as the provision of suitable open and play spaces by claiming that this would make schemes unviable, and by developing only parts of sites rather than the whole. Design should give a sense of ‘place’.</p> <p>They also comment that the Southwell Neighbourhood Plan requires developers to provide design briefs for whole allocated sites, and the District Council should enforce this. Core Policy 9 should require developers to provide</p>	<p>Noted. The Local Planning Authority sympathises with the concerns of Southwell Town Council. It is not possible in all circumstances to resist the partial development of a site if it does not prejudice the development of the rest of the site. Comprehensive development is normally sought.</p>	

sustainability and design briefs for the whole of all allocated sites. These should be produced after consultation with the Local Planning Authority and with local residents through their Parish Council.		
Sustainable Development – Para 5.40		
Anglian Water supports the Council’s intention to prepare a Sustainable Design SPD.	Support noted	
Core Policy 10 –Climate Change		
(01) The Internal Drainage Board made comment that the policy is generally appropriate with regard to flood risk.	Support noted	
Clarification sought over policy reference to being ‘efficient in consumption of energy and water’, and how this is to be achieved. Additional standards viewed as unnecessary and should be left to other regulations.	Reference reflects the general support the Authority provides for energy and water efficient development, as well as the direction of travel in revisions to the Building Regulations. Importantly the policy provides support where applicants wish to voluntarily exceed applicable standards. Mandatory higher standards than those within Building Regulations are not being sought. This is existing policy wording and no change is proposed.	
Scenarios exist where new development in a flood risk area would not be required to carry out the exception test. For example proposals which national policy would not support in Flood Zone 3 but on which there may be other material considerations weighing in favour of the proposal. Policy should be amended to ensure that the safety of the development and future flood risk over the lifetime of the development can be provided for in such circumstances.	Amend in line with representation. Amend 5th bullet point to read: ‘Where appropriate having applied the Sequential Test move on to apply the Exceptions Test, in line with national guidance. <u>In those circumstances where the wider Exceptions Test is not required proposals for new development in flood risk areas will still need to demonstrate that the safety of th development and future occupants from flood risk can be provided for, over the lifetime of the development; and’</u>	MM/0007

Core Policy 10a –Local Drainage Designations		
(01) The Internal Drainage Board made comment that the policy is generally appropriate with regard to land drainage. The Canal and River Trust made comment that the assessment and mitigation of flood risk promoted by policy CP10a will ensure that development in Lowdham and Southwell will manage water run-off. The effectiveness of the policy will depend on the wording in the future Local Drainage Designations SPD.	Support noted	
(02) Applications for sites over 5 properties in the Southwell Area should be modelled against the model of water flow, prepared by Notts County Council.	The precise details of local drainage designations will be established through a Supplementary Planning Document, to be produced following adoption of the amended Core Strategy.	
Core Policy 11 – Rural Accessibility		
2 representors believe that the policy should encourage intermodal operation of public transport.	The Council believe this is already covered in the existing policy wording.	
Core Policy 12 – Biodiversity and Green Infrastructure		
(01) Natural England welcome the additional point within the policy wording, and paragraph 5.63 of the explanatory text, concerning air quality management. The Environment Agency is also supportive.	Support noted	
(02) Gladman Developments Ltd argue that Core Policy 12 should be based on robust evidence, allowing the Council to assess whether the adverse impacts of the loss of biodiversity and geological diversity significantly and demonstrably outweigh the benefits of delivering the full housing need.	Core Policy 12 is supported by Policy DM7 which provides detail on the levels of protection applied to different types of sites of biodiversity value. Landscape Character is addressed in Core Policy 13 and in greater detail in the Landscape Character	

<p>Gladman Developments Ltd refer to the NPPF stating that the planning system should contribute to and enhance valued landscapes, that Local Planning Authorities should set criteria based policies against which proposals for any development should be judged, and that distinctions should be made between the hierarchy of international, national and locally designated sites so that protection is commensurate with their status.</p> <p>(03) Tarmac Trading Ltd. argue that Core Policy 12 requires too much in terms of the conservation, enhancement and restoration of ecological features, and that this should only be provided if it is not too costly. They say that this is sometimes not viable and say that the policy should be reworded to weaken this requirement.</p>	<p>Assessment SPD. The SPD uses criteria to define landscape condition and sensitivity, from which a policy is derived and actions recommended.</p>	
<p>(04) Southwell Town Council, and a Town Councillor, comment that the green infrastructure links on the north and west of Southwell should be included</p>	<p>Green Infrastructure policies in the Southwell Neighbourhood Plan adequately cover this matter</p>	
<p>Core Policy 14 – Historic Environment</p>		
<p>(001) Historic England welcomes the revisions made to CP14 and has no outstanding issues.</p>	<p>Support noted</p>	
<p>(002) Tarmac Trading Ltd. refer to the NPPF and argue that the policy should distinguish between designated and non-designated assets rather than seeking the conservation and enhancement of both. Tarmac Trading Ltd. suggest that the policy should be reworded to require only the continued preservation conservation and enhancement of the character, appearance and setting of the District’s</p>	<p>Noted.</p>	

heritage assets and historic environment 'where appropriate'. Applications for new development should be accompanied by a proportionate assessment to describe the significance of heritage assets affected.		
Chapter 6: Area Policies		
NAP1 –Newark Urban Area		
Nottinghamshire County Council Strategic Transport team made a number of proposed clarification amendments on Highways matters covered in the Amended Core Strategy relation to the Newark Urban Area	The District Council has accepted many of these clarifications and minor amendments (See Appendix 3 for details).	CMA/ (6/10/11/12/14/15/17)
(01) The Canal and River Trust supports the addition to Policy NAP1 that development should respect the character and function of Newark's riverside area. Highways England made comment that identified junction improvements and funding would help mitigate the impact of employment and housing growth within Newark Urban Area.	Support noted	
(02) The Education & Skills Funding Agency have questioned the amendments made to 6.19 and 6.20 because it has removed reference to CIL funding in relation to secondary education.	Noted – this paragraph has been replaced by the new paragraph 6.19 which makes clear that the new Suthers School will be funded by ESFA not be CIL monies.	
NAP2A – Land South of Newark		
(01) Highways England welcome that development will be subject to transport assessments. It is expected that A46 bypass will help to accommodate growth at Land South and therefore encourage the phasing of the delivery of the site towards the latter part of the plan period enabling the bypass to be constructed in advance of significant growth. (044)	Comments of Highways England are noted, the allocation has extant planning permission that is conditioned to ensure that development is phased enabling infrastructure to be in place at the appropriate time.	
(02) Land South of Newark (LSoN) is the most appropriate	The Town Centre & Retail Study (TC&RS) forecasts	

<p>location to provide the early delivery of a large foodstore or superstore. Policy should be amended to reflect this.</p> <p>Site sequentially preferable to Land around Fernwood being better located and connected to the Newark Urban Area and available now with delivery on site occurring.</p> <p>South of Newark deficient in main food shopping provision, there is a lack of sequentially preferable sites to meet convenience shopping needs of LSoN residents and the ability to serve the wider Newark Urban Area.</p>	<p>convenience retail capacity to meaningfully emerge from the mid-term of the plan period (post 2026) onwards. So the suggestion that 'early delivery' would be necessarily appropriate is disputed, the key determinant over when and where additional provision would be supported is the application of the impact test.</p> <p>Study has demonstrated there to be no latent unmet requirement (i.e. no 'overtrading), and the requirements which do emerge are the result of population growth. Such growth will be largely driven by the strategic sites, with Land around Fernwood (3,200 dwellings) and Land South of Newark (3,150 dwellings) being significant contributors.</p> <p>As reflected within the amended Core Policy 8 the District Council is supporting of provision being made in a sequentially appropriate location within the main built up-area at either Land South of Newark (LSoN) or Land around Fernwood (LaF).</p> <p>The suggested sequential preferability of LSoN over LaF is not considered to be as clear cut as suggested. The scale of development and linkages to the wider Newark Urban Area clearly justify LaF as an alternative broad location. Whilst LSoN is more advanced in terms</p>	
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	<p>of its delivery, meaningful capacity is not projected to be available until post-2026 potentially allowing sufficient space for LaF to begin to deliver.</p> <p>No evidence is provided by the representor in support of the assertion that the south of Newark is deficient in main food shopping provision, it is assumed the argument is one of geography (i.e. that there is no existing convenience food retailer of any scale to the south of Newark Town Centre). However the TC&RS has quite clearly established there to be no capacity from the overtrading of existing stores.</p> <p>The approach to meeting future convenience retail needs does not preclude provision at Land South of Newark, indeed it provides support subject to appropriate caveats. Accordingly modification in line with that suggested is not viewed as necessary.</p>	
NAP2B –Land East of Newark		
(01) Highways England welcome that development will be subject to transport assessments	Support noted	
<p>(02) William Davis the developers of Land East of Newark make a number of objections to wording of the policy;</p> <ul style="list-style-type: none"> • Amend the policy to make clear that the size of the site would be resolved through master planning 	<ul style="list-style-type: none"> • The policy requires a master planning exercise to be undertaken, if it emerges out of this process that more/or less houses can be accommodated then this will obviously be taken on board by the authority in its decision making. It does not require a further amendment to the policy. 	

<ul style="list-style-type: none"> • Object to Figure 6 because it is out of date – request that it should be deleted • Object to the wording of Part 8v of NAP 2B relating to works to offsite in relation to Green Infrastructure is no necessary. • Object to the wording of Part 8vi as the site cannot connect to the wider countryside because of the A1 therefore they propose deletion • Part 8 viii should be revised to simply refer to “retention of important landscape features where practicable 	<ul style="list-style-type: none"> • Noted – Figure 6 is indicative – but it is accepted that it should better reflect the developable area. Amended Figure 6 has been prepared. • Agree – Delete • Noted - The District Council is happy to amend this to reflect earlier proposed wording suggested by William Davis to read “8 vi Safe, convenient pedestrian and cycle routes within and adjoining the development • Noted – the District Council believe that this level of detail is necessary to clearly define such features. No change 	<p>MM/0008</p> <p>MM/0009</p> <p>MM/0010</p>
NAP2C –Land around Fernwood		
(01) Anglian Water raised no objection to the proposed amendments to policy NAP2C, whilst Highways England welcome that development will be subject to transport assessments.	Support noted	
(02) The owner of the existing business park and the employment allocation is concerned that the site is no longer appropriate for B1 Business Use.	Noted - The provisions in NAP2C relate to the employment allocation not the existing business park. The plan does not restrict the allocation to only B1 uses but any B use, but says that non B uses can go on the site subject to meeting policy requirements. But we do want to ensure that business uses can be accommodated on the site.	CMA/0013

	Proposed amendment to say “employment allocation” instead of employment area.”	
(03) Persimmon Homes want to remove the requirement to provide fibre optics from Paragraph 13 iii	Noted the policy does not require the developer to provide fibre optics it requires the developer to work with BT and ensure that BT are able to provide fibre optics under their existing programme.	
SoAP1 – Role and Setting of Southwell		
(01) Nottingham Trent University supports the proposed changes to policy SoAP1 on the basis of a clearly identified vision and its appropriateness and consistency with national policy.	Support noted	
(02) 2 representors made a number of suggestions regarding specific infrastructure requirements, including junction improvements in Southwell.	The Council believes that the policies which will deliver required infrastructure to support new infrastructure	
Para 6.79 – Brackenhurst Campus – Nottingham Trent University		
Nottingham Trent University supports the memorandum of understanding at para 6.79 between the District Council and Nottingham Trent University.		
SoAP2 - Brackenhurst Campus – Nottingham Trent University		
Nottingham Trent University support policy SoAP2 with a proposed amendment to take account of new opportunities created by potential additional student accommodation on site. NTU recommend modification of wording taking into account student accommodation development which can demonstrate clear and positive opportunities for growth and assist in meeting the objectives more effectively; securing mixed and balanced communities and ensuring Southwell is a sustainable place	Within the MoU it is estimated that student numbers will increase from 1000 to 1700 by 2019 and that an additional 150 bed spaces will be required. Reference is made to the fact that students are likely to remain in on site accommodation in years 2 and 3 and that off-site accommodation is scarce and unsuitable. Taking this into consideration and the safety net of the existing wording of bullet point 3 of the policy in terms of ‘detrimentally affect the setting of the campus’ the	MM/0011

<p>to live and work. Proposed amended wording – Support the development of new educational and research facilities and additional student accommodation at the Brackenhurst Campus</p>	<p>Council considers that the proposed amendment to bullet point 1 is acceptable Action - Amend bullet point 1 to read: Support the development of new educational and research facilities <u>and additional student accommodation</u> at the Brackenhurst Campus</p>	
<p>ShAP2 ‘-Role of Ollerton & Boughton’</p>		
<p>Lack of remaining large-scale allocations in the area means that the range of infrastructure requirements identified in the policy are undeliverable (primary and secondary education, healthcare facilities and the improvement of Ollerton Roundabout).</p> <p>Additional site allocations proposed in response.</p>	<p>The range infrastructure requirements required to support development in Ollerton & Boughton has been informed by the Infrastructure Delivery Plan, and represents the best information available at this time. It is considered that these requirements will be deliverable through a combination of CIL, planning obligations, developer contributions and other funding assistance. Secondary education will be funded through CIL and so is not dependent on development in Ollerton & Boughton. Whilst Ollerton Roundabout is subject to a funding bid, illustrating the potential for other funding assistance to be secured. Beyond this there remain significant sites which are yet to be brought forward within the settlement that have the potential to make developer contributions.</p> <p>The allocation of non-strategic sites is beyond the scope of the review of the Core Strategy, such decisions will be made through the review of the Allocations & Development Management DPD.</p>	
<p>ShAP3 – Role of Edwinstowe</p>		
<p>(01) The RSPB and Nottinghamshire Wildlife Trust are</p>	<p>Noted</p>	

supportive of this policy.		
(02) Conflict between the allocation of Thoresby Colliery and the heritage and nature conservation aims of ShAP3, and overall vision of sustainable development.	It is not considered that there is any significant conflict between the objectives of ShAP3 and ShAP4. ShAP3 is a new policy developed in response to the allocation of Thoresby Colliery, and is intended to ensure that potential impacts can be appropriately addressed and/or mitigated. The policy is considered to provide an appropriate basis for doing so, balancing the facilitating of growth against the desire to protect and/or enhance the valuable characteristics of the settlement and its surrounding natural environment whilst also ensuring that growth can be accommodated in infrastructure terms.	
ShaP4 – Land at Thoresby Colliery		
(01) Historic England welcomes the revisions made in respect of Thoresby Colliery and has no outstanding issues. Highways England raised no objection on this matter.	Support noted	
(02) Need for significant efforts to protect conservation and amenity assets.	The allocation of the site and the associated policy approach has been guided by the Integrated Impact Assessment (incorporating the Sustainability Appraisal) and Habitats Regulations Assessment. Stakeholders with an interest in nature conservation issues are satisfied that the approach is sound. The policy provides an appropriate range of measures to avoid and/or mitigate impact. Allocation of the site does not conflict with the landscape advice. Whilst this has identified a range of likely impacts mitigation measures have also been	
(3) Allocation conflicts with the Council’s landscape assessment, and the mitigation measures proposed being insufficient.		

	recommended in response. These have been factored into the site allocation policy and will guide how the matters of landscape and green infrastructure are addressed.	
(04) Section 13 of site allocation policy should require provision being made for the long-term management of the restored heathland area on the colliery pit tip to the north of the proposed allocation, given it will inevitably be heavily used by residents of the new development.	Considered that paragraph 13 implicitly covers this, and that this level of detail is best left to the Development Management process.	
(05) Site is not well located for access by non-car modes and public transport.	Considered a sustainable location from which good public transport and sustainable transport links can be provided. Indeed the scale of development proposed is likely to be able to support the extension of existing and/or creation of new public transport services. This is reflected in the policy wording of ShAP4 which emphasises the importance of maximising the opportunities for sustainable travel and achieving suitable access to local facilities.	
(6) Employment provision may stifle the delivery of the remaining parts of the Bilsthorpe Colliery site. Plan should consider whether it is appropriate to phase the release of employment land behind that at Bilsthorpe to avoid two uncompleted employment sites	In employment land terms land at the former Bilsthorpe Colliery is counted as 'serviced employment land', following the lapse of the original site-wide consent. Post the granting of consent for a gasification plant, and the rationalisation of remaining land (taking out that which is realistically undevelopable) there remains a small residual amount of land available. This aside without strong justification the introduction of potentially overly restrictive phasing requirements is considered counter to the pro-economic growth	

	agenda set by national policy. The redevelopment of Thoresby Colliery will provide for a sustainable mixed use development. Given the residual amount of land remaining at Bilsthorpe the imposition of any undue restriction over when employment land can be brought forward is not viewed as appropriate.	
(7) Policy should be modified to provide clarity over how coal mining legacy issues should be addressed. Including the requirement for a 'Coal Mining Risk Assessment', or equivalent report.	Agreed: Add new final criterion to point 10 of ShAP4 to read: 'viii. Coal Mining Risk Assessment or equivalent report addressing any potential coal mining legacy issues'	MM/0012
(8) Need for the allocation of the site is questioned given the balance of sites being carried and OAN requirements.	Identification of the site responds to a significant regeneration opportunity, and is considered to represent a sustainable location for growth. The site allocation policy provides a sound and appropriate basis for bringing development forward. Allocation of a strategic mixed use scheme of a significant scale in the west of the District will balance the growth planned for the Newark Urban Area, provide additional flexibility in terms of housing land supply, support the meeting of housing needs and enhance the prospect of a five year land supply being maintained.	
Appendices		
Appendix F		
It is noted that the Council is proposing Opportunity Sites which will be brought forward for development if identified as necessary through monitoring. The HBF is	Appendix F for both policies SP2 and SP5: Indicator: Where the five year land supply position fall below 5 years for a period of two consecutive years,	CMA/ 0018

supportive of a reserve site policy approach. However the Council's monitoring as set out in Appendix F has no triggers which would bring forward the proposed Opportunity Sites. The HBF recommend that specific monitoring triggers are introduced.	the LPA will seek to assist the owners of the Opportunity sites to unlock delivery. Measures could include securing alternative sites for the existing use, granting Permission in Principle on brownfield sites, seeking Government funding to assist in the release of the site, consider purchasing the site on behalf of the Council's Development Company or Compulsory Purchase. Target: To deliver the approach to the Spatial Strategy	
Policies Map Amendments		
Gazeley UK limited request that NUA/E1 (G Park) is designated as employment land	This request is outside of the scope of the Core Strategy	
Habitat Regulations Assessment (HRA)		
Natural England and the RSPB endorse the conclusions of this document.	Supported noted	
Integrated Impact Assessment (IIA)		
Natural England consider the IIA follows accepted guidance and methodologies and provides a thorough assessment of the potential environmental impacts of the revised Core Strategy. They acknowledge that their interests have been covered in the baseline information.	Support noted	
Duty to Cooperate		
Both Ashfield District Council and Gedling Borough Council support the housing and employment requirements and consider that the Duty to Cooperate has been met.	Support noted	

Appendix 1:

Specific Consultation Bodies

Specific consultees:

Duty to Co-operate –The Bodies Prescribed for the purpose of section 33A (1) (c) are highlighted in bold.

Neighbouring Local Planning Authorities (Ashfield DC, Mansfield DC, Bassetlaw DC, West Lindsey DC, North Kesteven DC, South Kesteven DC, Melton BC, Rushcliffe BC, and Gedling BC);

Nottinghamshire County Council;

Leicestershire County Council;

Lincolnshire County Council;

Central Lincolnshire Joint Planning Unit;

Nottingham City Council;

National Grid;

The Coal Authority;

The Environment Agency;

Highways England;

Highway Authority (Nottinghamshire County Council Highways)

Integrated Transport Authority N/a

NHS England and local NHS;

Primary Care Trust (Newark and Sherwood CCG and Nottingham North CCG) Newark and Sherwood CCG and Nottingham North CCG)

The Historic Buildings and Monuments Commission for England (**English Heritage**);

Natural England;

The Civil Aviation Authority

Severn Trent Water;

Anglian Water;

Homes and Communities Agency;

Upper Witham Internal Drainage Board;

Trent Valley Internal Drainage Board;

Telecommunications providers;

Network Rail;

The Office of Rail Regulation (Office of Rail and Road)

Ofcom;

The Marine Management Organisation

Nottinghamshire Police; and

Town and Parish Councils and Parish Meetings including Newark Town Council, Ollerton and Boughton Town Council and Southwell Town Council.

And;

Local Enterprise Partnership (Section 33A (9) (D2N2)

Local Nature Partnership (Lowland Derbyshire and Nottinghamshire Local Nature Partnership)

Appendix 2:
List of Representors

Representor Number/Name	Representor Organisation	Agent Name	Agent Organisation
1) Sellers, Daniel			
2) Tucker, Simon	Canal and River Trust		
3)	Nottingham Trent University	Hunt, Sarah	P&DG (Planning and Design Group)
4) Wilkins, Seb	Gedling Borough Council		
5) Deeming, Roslyn	Natural England		
6) Dwan, Christopher	Avant Homes		
7) Scholter, Wayne	Aldergate Properties		
8) Lange, Bettina	Nottinghamshire CPRE		
9)Wilkinson, Colin	RSPB		
10) Ballantyne, Caron	Collingham Parish Council		
11) Various Clients - Developers and Landowners		Northcote, Anthony	Town-planning.co.uk
12) Ashton, Stuart	Harworth Group PLC	Lewis-Roberts, Steve	Pegasus Group
13) Anthony, Ross	Theatres Trust		
14)	Southwell & Nottingham Diocese	Hodson, Janet	JVH Town Planning Consultants Ltd
15)	Strawson Property	Downes, Mike	Aspbury Planning Limited
16) Various Clients		Downes, Mike	Aspbury Planning Limited
17) Mills, Katie	Mansfield District Council		
18) Wilson, Nina	Nottinghamshire County Council		
19) Sparks, David	Minster Veterinary Centre	Moger, Andy	Tetlow King Planning
20) Sarris, Christine	Ashfield District Council		
21) Lindsley, Melanie	The Coal Authority		

22)	William Davis Ltd	Rose, Mark	Define Planning & Design
23) Thomas Cousins, Mrs J	Central Lincolnshire Local Plan Team		
24) Speck, Mark	Nottinghamshire Wildlife Trust		
25) Wellard, Yvette	Coddington Parish Council		
26) Green, Susan	Home Builders Federation		
27) Nicholson, Malcolm		Lindley, Chris	Heaton Planning Limited
28) Blake, Nick	Simons Developments	Green, David	Delta Planning
29) Glenn, Harvey	Pierrepoint Estates Management Ltd (The Thoresby Estate)	Sharp, Simon	JHWalter LLP
30)	Noble Foods Ltd	Courcier, Simon	Carter Jonas LLP
31) Millbank, Robert	Environment Agency		
32) Worrall, Rosamund	Historic England		
33) Hird, Guy	Upper Witham IDB		
34) Pashley, Megan	Gladman		
35) Deal, Tim	Tarmac Trading Ltd	Conway, Jenna	Heaton Planning Limited
36) Broughton, Tracey	Southwell Town Council		
37) Powell, Samantha	Education Funding Agency		
38) Hemsall, Philip			
39)	The Kelham Estate	Swinburne, Lynette	Savills UK Ltd
40)	The Trustees of G M Murdoch Settlement	Machin, George	Grace Machin
41) Gowlett, Chris	Persimmon Homes		
42) Harris, Peter			

43) Patience, Stewart	Anglian Water		
44) Griffiths, Scarlett	Highways England		
45)	Connolly Land and Developments (North Midlands) Ltd	Baseley, Nick	IBA Planning
46) Mr R Thomas	Owner of Land off Dale Lane	Baseley, Nick	IBA Planning
47)	IBA Planning	Baseley, Nick	IBA Planning
48) Mr S R Bowring	Owner of Land at Baulker Lane and Cavendish Way, Clipstone	Baseley, Nick	IBA Planning
49)	Urban and Civic	Gallagher, Gavin	Barton Willmore
50) Bradbury, John		Farley, Tim	Copesticks Ltd
51) Yarwood, A R	National Federation of Gypsy Liaison Groups		
52) Bassetlaw District Council			
53) Gascoine/Pegasus			
54) Tristram, NJ	Millcroft Homes		
55) Gazeley			
56)	South Muskham & Little Carlton PC		
57) John Robinson			

Appendix 3:

Main Modifications and Clarifications/Minor Amendments to the Publication Amended Core Strategy

Part of the Core Strategy	Main Modification (MM) or Clarification/ Minor Amendment (CMA)	Proposed Change
Introduction		
Introduction Para 1.4	CMA/ 0001	Amend The word 'required' will be changed to 'requires' in paragraph 1.4
Spatial Policies		
Spatial Policy 2	CMA/0002	Amend the first sentence of para 4.17 to read: In seeking to meet the District's Objectively Assessed Housing Need (OAN), the District Council must plan for <u>a minimum of 9,080 dwellings</u> over the Plan period. and the first sentence of the second paragraph of Policy SP2 as follows: The housing requirements for Newark & Sherwood District between 2013 and 2033 are <u>a minimum of 9080 dwellings</u> .
	CMA/0003	Amend Policy SP2, paragraph between the housing and employment tables, first sentence to read: The employment land requirement for Newark & Sherwood District between 2013 and 2033 <u>is a minimum of 83.1 hectares</u>
Spatial Policy 3	MM/0001	It is proposed to amend the Need Criterion accordingly: <i>Need</i> - Employment and tourism which requires a rural/village location are sustainable and meet the requirements of <u>the relevant Core Policies</u> . New or replacement facilities to support the local community. Development which supports local agriculture and farm diversification. New housing where it helps to meet identified proven local need <u>support community facilities and local services</u> . Neighbourhood Plans may set detailed policies reflecting local housing need elsewhere housing schemes of 3 dwellings or more should meet the mix and type requirements of Core Policy 3.

		<u>and reflects local need in terms of both tenure and house types;</u>
Para 4.26	MM/0002	<p>4.26 <u>The Council considers that in locations with local facilities and services, additional development can support their continued existence. Limited Development within the setting of this policy requires applicants to demonstrate the services it will support. The policy makes provision for detailed policies in Neighbourhood Plans to set policies on local housing need (including mix and type) elsewhere for larger schemes (i.e. for those of 3 or more dwellings) the Council expects new development to satisfy the mix and type requirements of Core Policy 3. It is recognised that for schemes of one or two dwellings it will not be possible to require a particular type or mix of dwellings.</u></p> <p>and the housing need within the area. As with all planning policy, Spatial Policy 3 is intended to serve the public interest rather than that of individuals and consequently the requirement to reflect local need in relation to new dwellings to which it refers must be that of the community rather than the applicant. It is accepted that the two may align where, for example, a lack of a particular type of housing in a community also reflects the needs of an applicant. The Policy is not intended to cater for individuals desire to live in particular locations or in particular types of accommodation, beyond those exceptions identified in national and local planning policy. The Council has conducted a detailed assessment of the types of housing needed within different parts of the district and applicants should refer to this for guidance. Neighbourhood Plans may also set out more detailed policies on local housing requirements.</p>
Para 4.28	CMA/0004 *	<p>Amend Para 4.28: The Nottingham-Derby Green Belt prevents the Nottingham Conurbation from merging with the surrounding towns and villages within Nottinghamshire and the nearby city of Derby. Its status was confirmed in the recent East Midlands Regional Plan. The plan states that in the Northern Sub-Region:</p> <ul style="list-style-type: none"> • No strategic changes should be made to the Green Belt in this Sub-Area. • When considering development provision in and around settlements affected by the Green Belt, LDFs should critically assess any impact on the Green Belt and whether development should be located elsewhere. <p>Allocations should not allow for commuter led development which could put pressure on Green Belt boundaries.</p> <p><u>The NPPF sets out that an essential characteristic of the Green Belt is its permanence, with boundaries only being altered in exceptional circumstances through the Development Plan process. No strategic changes are envisaged proposed in the extent of the Green Belt within the District, as a number of small scale reviews were undertaken are proposed to reflect the requirement to address local housing need in Lowdham, and support regeneration in Rainworth and Blidworth. These reviews will be undertaken as part of the Allocations &</u></p>

		Development Management DPD in 2012.
Para 4.38	CMA/0005	Add additional sentence at the end of Para 4.38 to read: Measures could include securing alternative sites for the existing use, granting Permission in Principle on brownfield sites, seeking Government funding to assist in the release of the site, consider purchasing the site on behalf of the Council’s Development Company or Compulsory Purchase.
Spatial Policy 7	CMA/0006	Amend: “The District Council will safeguard locations of highway or public transport schemes identified within the Nottinghamshire Local Transport Plan <u>and its implementation plan.</u> ”
Spatial Policy 9	MM/0003	New wording similar to: ‘The allocation of sites for development will not lead to the sterilization of known mineral resources as defined within the Minerals Local Plan’ will be added to Spatial Policy 9
Core Policies		
Core Policy 1	CMA/0007	Insert at 5.10 after Table 3 “Affordable Housing Bedroom Requirements”
Core Policy 3	MM/0004”	Amend third paragraph of Core Policy 3 to read: The District Council will seek to secure new housing development which adequately addresses the housing need of the District, namely including but not limited to:
Para 5.15	CMA/0008	Amend para 5.15: <u>Through the Gypsy and Traveller Accommodation Assessment (June 2016) (GTAA) a need for 40 pitches has been identified between 2013 - 2028. As a result of permissions having been granted since 2013, 28 additional pitches need to be provided over the rest of the GTAA plan period.</u>
Core Policy 4	CMA/0019	Amend third paragraph to: The Council will secure 40 pitches to meet <u>the identified minimum</u> need over the period of the current GTAA as follows:’
Core Policy 8	MM/0006”	Amend 9th bullet point to read: ‘Ensure that the development of new centres consolidates and enhances the hierarchy of centres and does not harm <u>with the likely impact on the vitality and viability of existing centres being appropriately assessed;</u> and”
Core Policy 8 *	CMA/0009	Amend third bullet point under paragraph 5.31 to: <ul style="list-style-type: none"> • Whilst the main towns and smaller centres in Newark and Sherwood District appear to be vital and

		<p>viable, they are nevertheless vulnerable to increased competition from out-of-centre retailing and the growth of internet shopping. Newark Town Centre is shown to have lost market share to competing out-of-centre foodstores, retail warehouses and retail parks. There has also been dynamic growth in smaller convenience stores operated by the major grocers. Where proposed on the edge or outside of smaller centres, this form of retail development can result in significant adverse impact on trading performance and overall vitality and viability – particularly where a centre is anchored by a smaller supermarket(s) or convenience stores.</p> <p><u>This resulted in the Study recommending that a District-wide 350sqm (gross) threshold should be introduced, whereby an impact assessment would be required. However given the difference in scale between Newark Town Centre and the other centres in the hierarchy, and having had regard to the scale and the form of recent retail proposals within Newark Urban Area this was raised to 400sqm (gross) in this location.</u></p>
Core Policy 10	MM/0007	<p>Amend 5th bullet point to read: ‘Where appropriate having applied the Sequential Test move on to apply the Exceptions Test, in line with national guidance. <u>In those circumstances where the wider Exceptions Test is not required proposals for new development in flood risk areas will still need to demonstrate that the safety of th development and future occupants from flood risk can be provided for, over the lifetime of the development; and’</u></p>
Area Policies		
Newark Urban Area		
Para 6.15	CMA/0010	<p>amend to read “Key to this will be the delivery <u>completion</u> of the Southern Link Road (SLR) <u>currently constructed between Staple Lane and Bowbridge Road</u> which <u>when finished</u> will provide a link between the A46 at Farndon and the A1 at Balderton.</p>
Para 6.16	CMA/0011	<p>Noted – amend list to have one A46 reference thus;</p> <p>“is required in the following locations:</p> <ul style="list-style-type: none"> • A46/A617 Cattle Market Roundabout; • A46 Newark Bypass – Upgrade(s) Link Capacity, Newark on Trent Bypass;

		<ul style="list-style-type: none"> • A46 Roundabout at Farndon; • A1/B6326 London Road Roundabout, Balderton; • A1/A17/A46 Roundabout; and • A1/A46 Brownhills Roundabout; • A1 Overbridge, Fernwood; and • A617 Kelham Bypass.”
NAP2A – Land South of Newark		
Figure 5	CMA/0020	Amend: Figure 5 to remove the old A46
Para 6.47	CMA/0012	Amend the document to read: “The employment allocation for B2/B8 uses is expected to be sufficient up to 2026 <u>2033</u> , but the British Gypsum land could be considered within the plan period if the land became available at an earlier date and if the allocated employment site is fully developed.”
NAP2B	MM/0008	Amend: Figure 6 to be amended to reflect more detailed site appraisal.
NAP2B	MM/0009	Delete wording of Part 8v
NAP2B	MM/0010	Amend 8vi: “Safe, convenient pedestrian and cycle routes within and adjoining the development”
NAP2C	CMA/0013	Proposed amendment to say “employment allocation” instead of employment area.”
Newark Southern Link Road		
Para 6.74	CMA/0014	Amend to include Nottinghamshire County Council. <u>“Developers are responsible for the construction of the SLR, and the Local Enterprise Partnership, national government, Nottinghamshire County Council and the District Council are contributing funding.”</u>
SoAP2	MM/0011	Action - Amend bullet point 1 to read: Support the development of new educational and research facilities and additional student accommodation at the Brackenhurst Campus
Thoresby Colliery		
ShAP4 Section 12.vi	CMA/0015	Amend to include the word vehicular: <u>vi. Safeguarding of a route for alternative vehicular access to the new Sherwood Forest Visitor Centre;</u>
ShAP4	MM/0012	Add new final criterion to point 10 of ShAP4 to read: ‘viii. Coal Mining Risk Assessment or equivalent report addressing any potential coal mining legacy issues’
Appendices		

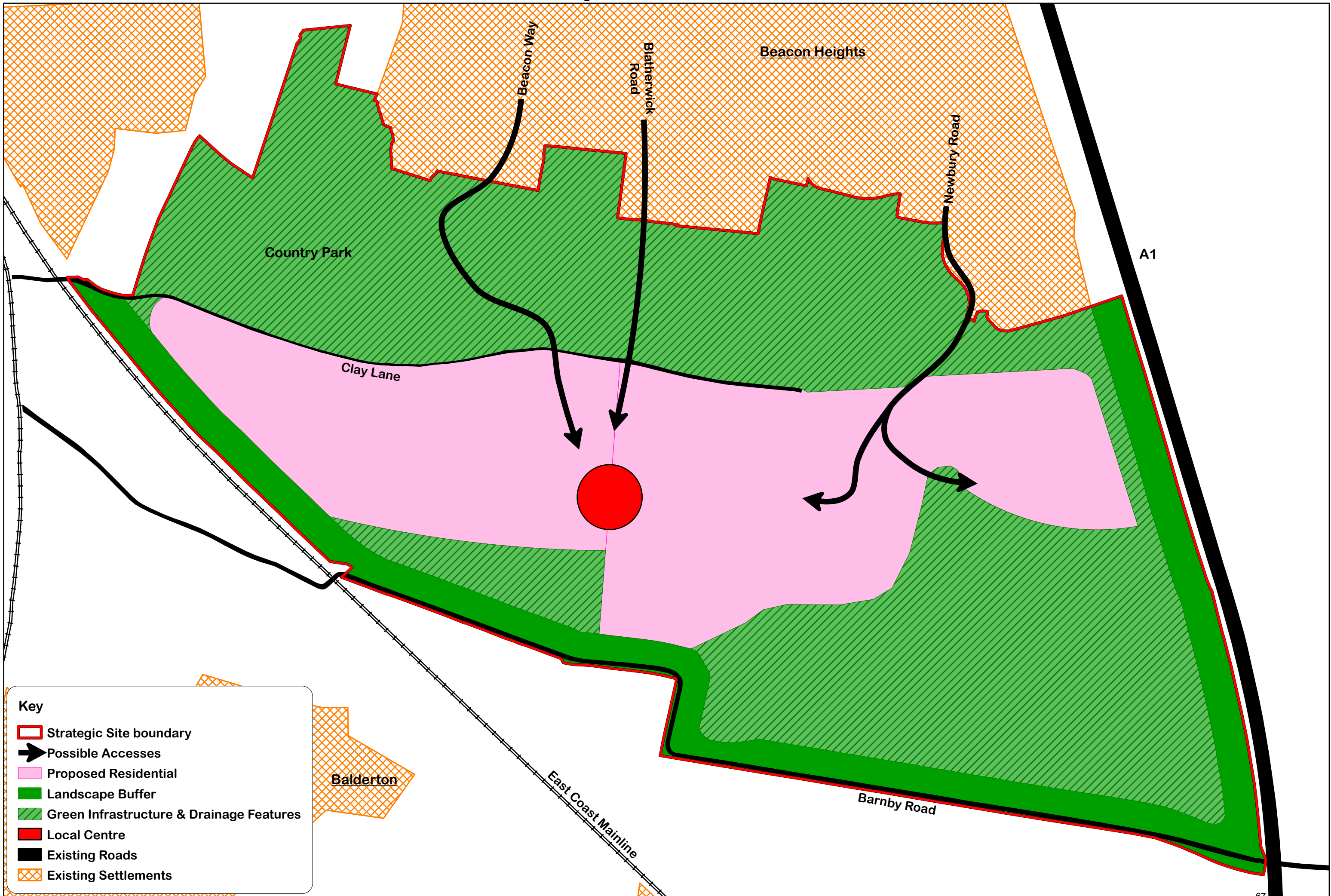
Appendix B	CMA/ 0016 *	Include: Housing Trajectory Chart at Appendix B
Appendix D	CMA/0017	Amend list to have: one A46 reference
Appendix F Policy SP2 and SP5	CMA/0018	Include a monitoring Indicator trigger and target in Appendix F for both policies SP2 and SP5: Indicator: Where the five year land supply position fall below 5 years for a period of two consecutive years, the LPA will seek to assist the owners of the Opportunity sites to unlock delivery. Measures could include securing alternative sites for the existing use, granting Permission in Principle on brownfield sites, seeking Government funding to assist in the release of the site, consider purchasing the site on behalf of the Council's Development Company or Compulsory Purchase. Target: To deliver the approach to the Spatial Strategy

***These CMA have been prepared by the District Council following discussion with the Council's Critical Friend Mr Nigel Payne BSc(Hons), DipTP, MRTPI, MCMi of Intelligent Plans & Examinations who has reviewed the DPD and various evidence base documents.**

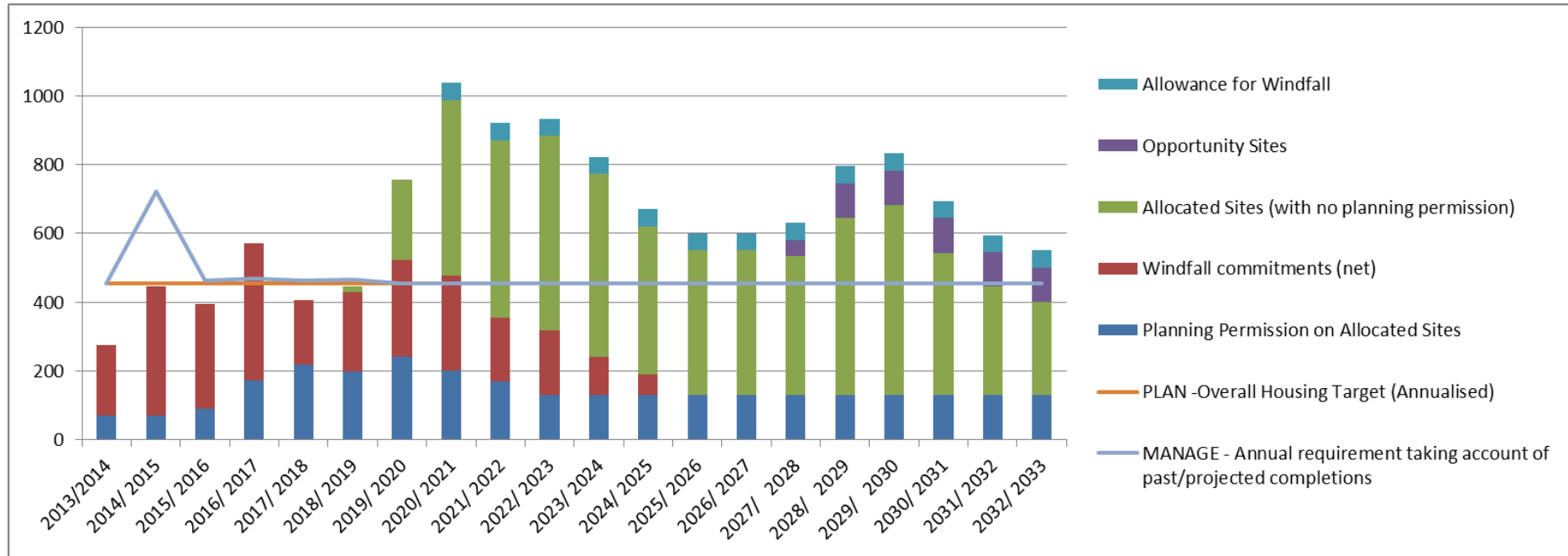
" Please note there is no Main Modification 5

MM/0008 - Figure 6

Figure 6 - Land East of Newark

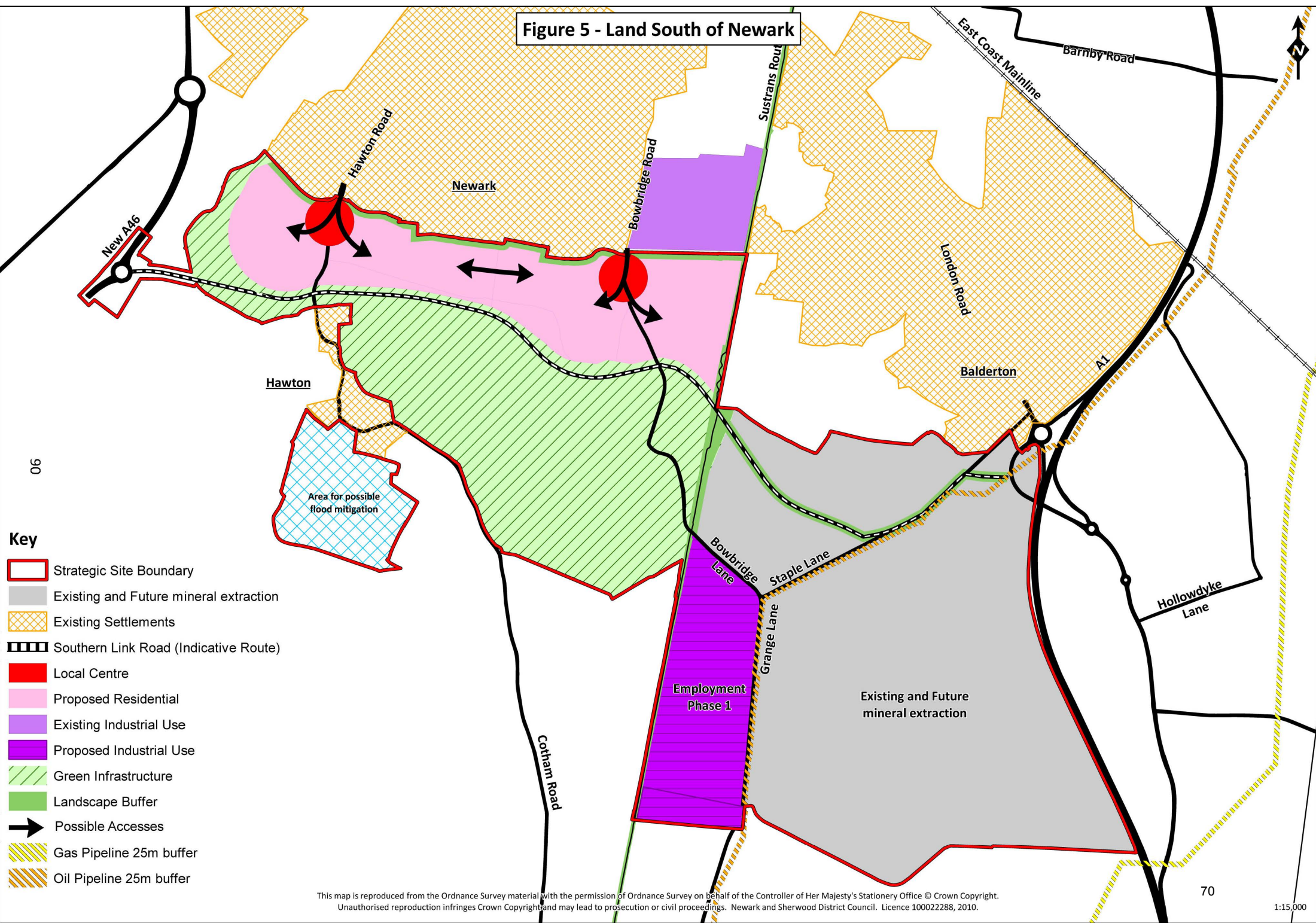


CMA/0016 – Housing Trajectory



CMA/0020 - Figure 5

Figure 5 - Land South of Newark



- Key**
- Strategic Site Boundary
 - Existing and Future mineral extraction
 - Existing Settlements
 - Southern Link Road (Indicative Route)
 - Local Centre
 - Proposed Residential
 - Existing Industrial Use
 - Proposed Industrial Use
 - Green Infrastructure
 - Landscape Buffer
 - Possible Accesses
 - Gas Pipeline 25m buffer
 - Oil Pipeline 25m buffer

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