



Newark & Sherwood Local Development Framework

Plan Review

**Amended Allocations & Development Management
DPD – Issues Paper**

Statement of Consultation

September 2019

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1.0 Introduction

- 1.1 The District Council are currently in the process of reviewing its Development Plan, made up of the Amended Core Strategy (ACS) and the Allocations and Development Management Development Plan Document (DPD).
- 1.2 The Issues Paper Consultation is the first consultation stage of the review of the Allocations & Development Management DPD and set out the scope of the Review, the issues we have identified as important and potential approaches to addressing them. Public consultation took place between 8th July 2019 and 19th August 2019. The District Council sent emails to everyone on the Planning Policy database to inform them about the consultation, notices were placed in the local press, copies of the document were placed in all District libraries and a number of consultation events were held.

Purpose of the Consultation Statement

- 1.3 This Statement of Consultation sets out the consultation which was undertaken and the responses received in relation to the Issues Paper of the Amended Allocations & Development Management DPD in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 requires that for the preparation of a local plan, it must:

<p>Preparation of a local plan</p> <p>18.—(1) A local planning authority must—</p> <ul style="list-style-type: none">(a) notify each of the bodies or persons specified in paragraph (2) of the subject of a local plan which the local planning authority propose to prepare, and(b) invite each of them to make representations to the local planning authority about what a local plan with that subject ought to contain. <p>(2) The bodies or persons referred to in paragraph (1) are—</p> <ul style="list-style-type: none">(a) such of the specific consultation bodies as the local planning authority consider may have an interest in the subject of the proposed local plan;(b) such of the general consultation bodies as the local planning authority consider appropriate; and(c) such residents or other persons carrying on business in the local planning authority's area from which the local planning authority consider it appropriate to invite representations. <p>(3) In preparing the local plan, the local planning authority must take into account any representation made to them in response to invitations under paragraph (1).</p>

- 1.4 Regulation 17 of the Town and Country Planning (Local Planning) (England) Regulations 2012 requires planning authorities, when preparing a local plan, to publish a '*statement setting out -*
- (i) *which bodies and persons were invited to make representations under Regulation 18,*
 - (ii) *how those bodies and persons were invited to make such representations,*
 - (iii) *a summary of the main issues raised by those representations, and*
 - (iv) *how those main issues have been addressed in the local plan,'*

1.5 This report summarises the consultation process and sets out the feedback received. These comments helped to shape the amendments made to the final draft of the SPD.

2.0 Public Consultation

2.1 The public consultation on the Issues Paper took place between the 8th July 2019 and 19th August 2019, a period of 6 weeks. A total of 58 responses were received.

2.2 In accordance with the Regulations, the District Council contacted various specific and general consultation bodies. An indicative list of groups is set out below and full details of the statutory consultees are included at Appendix 1.

Specific Consultees	General / Other Consultation bodies
Members of Parliament	Housing Associations
County Council	Developers incl. House Builders
Neighbouring Authorities	Planning Agents
Town & Parish Councils / Meetings	Members of the Public
Environmental Bodies	Council Members
Highways England	Council Officers
Network Rail	

2.3 All consultees received an email or letter by post setting out the period of consultation, where the documents could be viewed and the deadline for submitting comments (see Appendix 2.) Notices were also placed in the Local Press inviting representations and information about the consultation was posted on the Council's social media platforms

2.4 A summary of the responses received and the Council's response are set out in Appendix 3.

Appendix 1: List of Statutory Consultees

Organisation	
All parish councils within the District	All Council Members
Age UK	Anglian Water
Ashfield District Council	Bassetlaw District Council
British Gas	BT
The Coal Authority	Central Lincolnshire Joint Planning Unit (Lincoln, North Kesteven & West Lindsey)
East Midlands Chamber	EE Customer Services
Environment Agency	Campaign to Protect Rural England
Gedling Borough Council	Historic England
Highways England	Homes England
Home Builders Federation	Lincolnshire County Council
Leicestershire County Council	Melton Borough Council
Mansfield District Council	Members of Parliament
National Trust	National Grid
Natural England	Newark & Sherwood Clinical Commissioning Group
Network Rail	Newark & Sherwood District Council Planning Development
Newark & Sherwood Community & Voluntary Service	Nottinghamshire County Council
Nottinghamshire Coalition for Disabled Persons	Nottinghamshire Police
Nottinghamshire Fire & Rescue	Nottinghamshire Wildlife Trust
O2	Rushcliffe Borough Council
Severn Trent Water	South Kesteven District Council
Three Customer Services	Trent Valley Internal Drainage Board
Vodafone	Western Power Distribution

Appendix 2: Text of Letter sent to Statutory Consultees and Consultees on the Local Plan Database

8 July 2019

Dear Consultee,

Local Development Framework Plan Review – Allocations and Development Management Issues Paper Consultation

The District Council is currently in the process of reviewing its Development Plan, made up of the Amended Core Strategy (ACS) and the Allocations & Development Management Development Plan Document (ADMDDP). Following the adoption of the ACS in March this year, we are preparing to review the ADMDDP. The first step will be to consult on our Issues Paper, which poses a series of questions regarding changes which may be made in response to the evolving policy and economic situation. In particular we are seeking your views on our Affordable Housing Policy, Town Centres and Retail Strategy, Open Break Policy, potential allocation of Gypsy and Traveller sites and the ongoing suitability of existing allocations.

Consultation on the Issues Paper will run the six weeks between **8 July and 19 August 2019**. You can view further details of the consultation, the consultation document, supporting information and instructions on how to comment on our website at <https://www.newark-sherwooddc.gov.uk/planreview/>. Alternatively, all of the documentation has been placed on deposit at the District Council offices at Castle House (9am-5pm, Mon-Fri) and in libraries across the District (check <https://www.inspireculture.org.uk/reading-information/find-a-library/> for opening times).

We are intending to follow the Issues Paper consultation with further consultation on proposed detailed changes in October and November this year. If you have any queries about the consultation please contact the Planning Policy team by telephone (01636) 650000 or by email at planningpolicy@nsdc.info

Yours sincerely,

Appendix 3: Issues Raised by Public Consultation and LPA Response

ID	Organisation	Question	Comment
1	Winthorpe Estate Residents Group	1	Green Space Strategy as a matter of urgency. Planning applications are passed with no robust strategy to show compliance resulting in the risk of Legal action and loss of public faith. Response – The Council is currently preparing a new Green Space Strategy. The Council takes it duties as a Local Planning Authority very seriously, applications for planning permission are considered against the national and local planning policy and any material considerations which related to the particular case.
		2	Affordable housing should never come at the cost of Community green spaces that needs to be Council Policy. Response – Spatial Policy 8 sets a high bar for the development of green spaces. Total prohibition on development would be inconsistent with national policy.
		4	You need to engage with the public more, set up a solely public working group Response – Noted. The review of the Allocations & Development Management DPD will be subject to full public consultation in-line with the Statement of Community Involvement . This will include the holding of specific public events at the next stage of the review.
		6	The Council with the environment agency and any other official bodies MUST spearhead the flood alleviation for the Tolney Lane Community. The residents of Tolney Lane deserve better protection from flooding. Planning restrictions need addressing also, if proper flood defences were in place the community could expand as needed so families are not driven away because of short falls in provision. If any other community was treated this way it would be an act of racism and totally unacceptable Response – Noted. The Council has undertaken the Tolney Lane Flood Alleviation Options Appraisal , which considered the technical feasibility of mitigating and/or resolving flood risk issues in this part of Newark. This work will inform the development of a detailed strategy to ensure that the pitches required to meet gypsy and traveller accommodation needs up to 2033 will be delivered, including the role, which Tolney Lane can play as part of this. Discussions with external stakeholders, such as the Environment Agency will be an important part of that process.
		7	Flood defence needs addressing. Planning applications need decisions making in regard to need of pitches and keeping the community together as they wish. Response – Noted. See response to Question 6.
		8	With the Council declaring a climate emergency to stop development of Community Green Spaces. Protect and preserve all Community green spaces, Parks and Pitches outright no excuses. Allow the public to request LGS designations. Work with charities such as Fields in Trust so the protection will be in perpetuity.

			<p>Response – Spatial Policy 8 sets a high bar for the development of green spaces. Total prohibition on development would be inconsistent with national policy. The public may request Local Green Space designations but the council believes the best way to manage this is through neighbourhood plans rather than the District Local Plan. The council is happy to support community groups to enhance existing and new green spaces.</p>
		9	<p>YES, this approach needs to be publicly advertised and data gathered from Designations will allow the Council to see what areas the public hold dear and want protecting.</p> <p>Response – The council will support communities/Parish Councils who wish to use the Neighbourhood Plan process to identify candidate sites for Local Green Space designation.</p>
		10	<p>Where can I find more information regarding this?</p> <p>Response - http://builtforlifehomes.org/</p>
		14	<p>Community Green Spaces need urgent attention. For the mental, physical health and general wellbeing of the community they serve and the natural environment.</p> <p>Response – Council is undertaking a District-wide audit of spaces and producing a Green Spaces Strategy.</p>
		3,5,11,12,13	<p>unable to answer Background information would be useful</p> <p>Response – Noted. This is one of a series of consultations which has been undertaken on the Plan Review, information linking to the previous documents available on the website could be better signposted.</p>
2	Lindum Group	1	<p>The Lindum Group broadly agree with the Council's assessment of compliance with the NPPF 2019. As highlighted in our response to question 2 below, we firmly believe that an update to the Council's affordable housing policy is needed to ensure it complies with that of the NPPF.</p> <p>Response - Noted</p>
		2	<p>The Lindum Group strongly support the need for the Council to update its Affordable Housing Policy in line with the NPPF. This is especially relevant for 'entry-level exceptions sites', which is a completely concept in national policy guidance. It is our opinion that the Plan Review should include a separate Exceptions Site policy to ensure that this important policy guidance is not lost in a larger Affordable Housing Policy. Entry-Level exceptions sites can fulfil a useful function in meeting local needs in rural areas. Because these sites are exceptions, the Plan will need to clarify that any proposals that meet the definition are given appropriate weight through the decision making process.</p> <p>Response - Noted</p>
		10	<p>We consider policy DM5 in its current form to be a suitable design policy. The policy is both comprehensive and detailed and is sufficient to ensure development proposals meet a high standard. The introduction of Building for Life 12 is unnecessary and would cost applicants additional time and money when formulating planning applications.</p> <p>Response – The Council is considering whether to introduce a more standardised way of discussing layout and design with applicants the benefits of which we believe are clear for both parties. Given the standard is limited to urban design issues and does not seeks to introduce specific standards of building design and performance the Council understands that the viability implications are limited. However the comments are noted and will considered as the policy developed.</p>

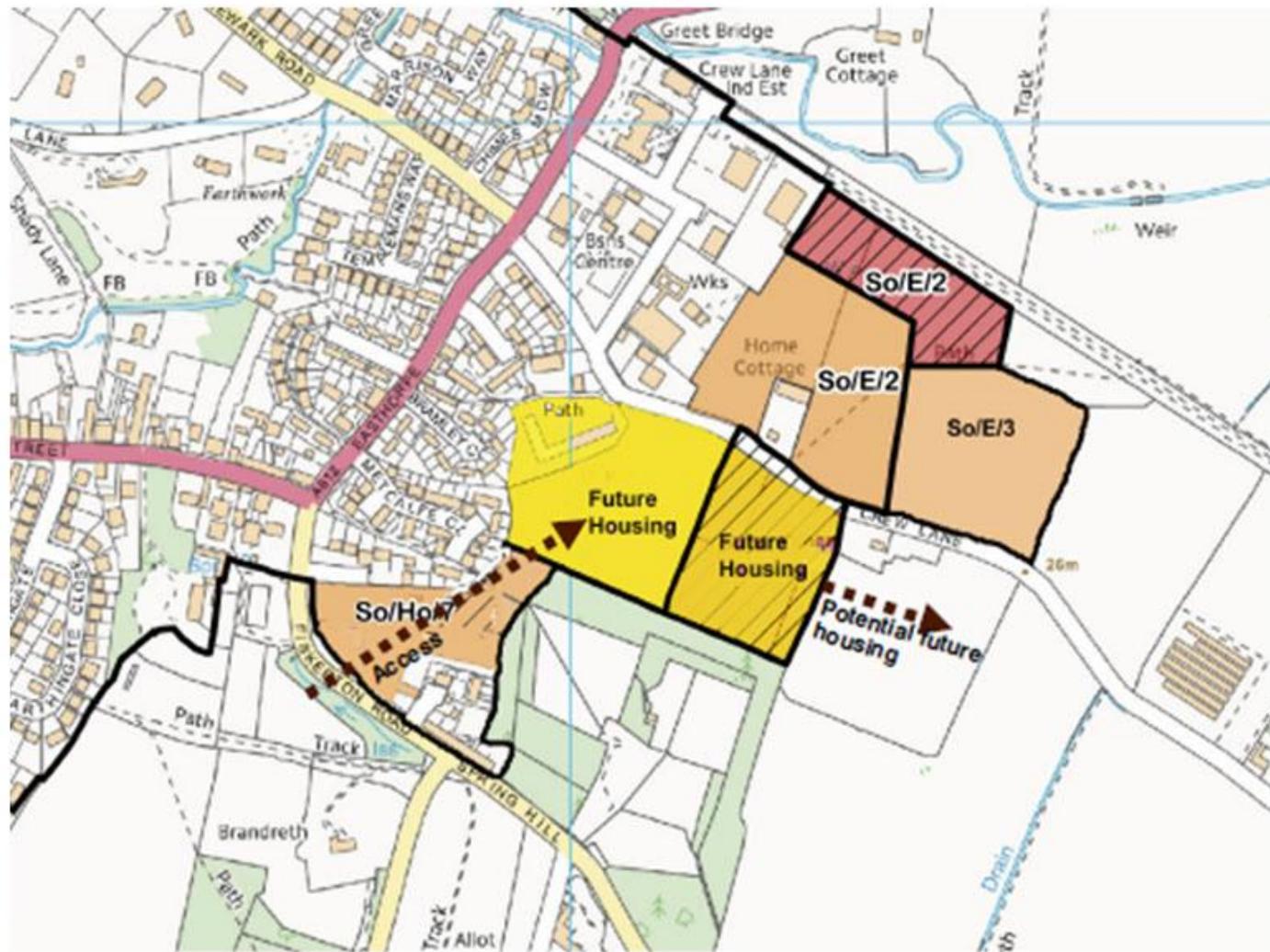
		12	<p>The Lindum Group are a Joint Venture partner on the allocated mixed use site to the north of the A17 in Newark (NUA/MU/1). As stated in the issues paper, the Wirtgen HQ development is now complete representing partial delivery of the allocation. The site is being actively marketed with high levels of interest shown by potential end users. We expect to submit for planning on several schemes before the end of the year, further supporting the sites allocated status.</p> <p>Response – Noted.</p>
3	Aspbury Planning OBO CAPLA Developments Ltd	10	<p>The Building for Life 12 standard is not a statutory requirement for development and therefore this should be carefully considered, particularly where this could threaten the viability of a scheme. The need to embed high quality design in new development is clearly outlined in the current Policy DM5 and therefore, there is already provision in the adopted Plan for functional, practical and high quality design, as such, this is considered to be sufficient to meet the requirements of the NPPF. The Building for Life 12 standard is aspirational and therefore should be treated as such and not as a rigid requirement of the Development Plan.</p> <p>Response –The Council is considering whether to introduce a more standardised way of discussing layout and design with applicants the benefits of which we believe are clear for both parties. Given the standard is limited to urban design issues and does not seeks to introduce specific standards of building design and performance the Council understands that the viability implications are limited. However the comments are noted and will considered as the policy developed.</p>
		11	<p>The made Southwell Neighbourhood Plan forms part of the Development Plan for the allocations in Southwell and as such must be taken into consideration by developers and the Local Planning Authority when formulating development proposals and in the consideration and determination of planning applications in the Neighbourhood Plan Area. All of the allocations adopted in the Allocations and Development Management DPD are also adopted in the Southwell Neighbourhood Plan, this would have been key to ensuring the Neighbourhood Plan was sound. Although the Neighbourhood Plan identifies some site specific requirements, it is not necessary to adopt these requirements in the Allocation and Development Management DPD since they form part of the Development Plan in any instance. Although we recognise that the Council may consider inserting any site specific requirements adopted by the Neighbourhood Plan into the allocation policies for Southwell contained within the Allocation and Development Management DPD for the purposes of continuity and consistency across the documents, we do not consider this to be necessary or appropriate.</p> <p>Response – Noted. It is intended to insert text to make it clear that development proposals on allocated sites in Southwell will also be subject to the policies of the Neighbourhood Plan.</p>
		12	<p>We support the inclusion of Site Reference So/Ho/5 'Land off Lower Kirklington Road' as a residential housing allocation in Southwell and also support the intention to continue the allocation of the site in the Plan Review, as identified on the Southwell Allocations Map. We do however stress the importance of emphasising in the policy that the number of dwellings (60 dwellings) is not a limit to the development of the site and instead should be treated as a guide for development. This site remains available for development and there have been no changes on site since its allocation which would impact upon its deliverability.</p> <p>Response – Noted.</p>
		1, 2, 13	Agreed Response – Noted.

4	Wood Plc obo National Grid		No comments
5	Severn Trent Water	4	<p>Severn Trent are supportive of policies that look to maximize the benefits and enhancement of local centres and retail areas, in particular policies that look to enhance biodiversity through the inclusion of trees and green features that could also incorporate SuDS to manage surface water flows.</p> <p>These policies can help to enhance both the economy, sense of place, flood risk and biodiversity within local centres, ultimately enhancing health and wellbeing.</p> <p>Response- Noted. Policy DM5 in its currently adopted form carries the expectation that surface water will be proactively managed and specifically identifies Sustainable Drainage Systems as a means of doing so. This is not proposed for alteration as part of the review.</p>
		5	<p>Severn Trent are supportive of policies that look to maximize the benefits and enhancement of local centres and retail areas, in particular policies that look to enhance biodiversity through the inclusion of trees and green features that could also incorporate SuDS to manage surface water flows. These policies can help to enhance both the economy, sense of place, flood risk and biodiversity within local centres, ultimately enhancing health and wellbeing.</p> <p>Response – Noted.</p>
		8	<p>Whilst Severn Trent cannot comment on the priorities for open space, we would acknowledge that open spaces can perform multiple operations, including flood resilience and surface water management, without adversely impacting on the primary function of the open space. In a number of cases if the SuDS features are designed correctly they can enhance the open space, increase biodiversity and in some case reduce maintenance requirements such as grass cutting. It is therefore important that Open space policies support the retrofitting of SuDS where they do not cause a detrimental impact on the primary function of the open space.</p> <p>Response – Noted.</p>
		10	<p>We would raise no objection to the consideration of Building for Life 12 standard within Policy DM5. Building for life supports a number of principles that align with sustainable development and SuDS. It is important that the development accounts for existing landscape including features such as watercourses, and how these could be utilised to form a sense of place within the development (open features that can accept surface water flows from the development).</p> <p>Response – Noted.</p>
		11	<p>This approach would result in greater certainty regarding development sites, as Local Plans are required to consider Neighbourhood Plans, there could be a risk of less strategic growth being applied due to a wider dispersal of available sites if the Local Plan and Neighbourhood Plan are not aligned.</p> <p>Response – Noted.</p>
		13	<p>The allocation of sites as opportunity sites indicates that there is low certainty / Likelihood that development will come forward at these locations, we will not therefore be planning any improvement to accommodate these developments at this time. If development of these</p>

			sites does subsequently require capacity, improvements there may be a need to implement Grampian Conditions to enable improvements to be delivered prior to completion of the developments. Response – Noted.
6	Bill Davidson, Newark Business Club	1	Agree. No. Response - Noted
		4	Yes. Review of Primary and Secondary Retail Frontage should have regard for present and forecast High Street health issues
		2, 3, 5	Yes Response – Noted.
7	Councillor Peter Harris	1	No, for other matters see notes below Response - Noted
		2	No - all housing should be at Level 6 of the UK Code for Sustainable Homes Response – Noted housing standard are not included within this area of the development plan.
		5	There should be no development in open breaks already established. There should be engagement with every community to identify open breaks for the policy. Response – A blanket ban would be contrary to national policy and unreasonably restrictive, especially where some forms of development may be appropriate. Some consideration was given to identifying Open Breaks elsewhere around Newark and the District but we consider SP3 and DM8 are sufficient to control inappropriate development. Council will support Parishes who wish to use the Neighbourhood Plan process to create their own Open Break policies, where coalescence is a possibility.
		8	Development on open spaces including Main Open Areas should be controlled including a presumption against inclusion of the land into residential gardens. Response – Noted. Existing open spaces are protected through SP8, where development proposals are assessed on their merit.
		9	No - There should be engagement with every community to identify open breaks for the policy. Response – Noted. Where a parish wants to identify Local Green Spaces or Open Breaks, the Council will support the production of a Neighbourhood Plan.
		10	All housing should be at Level 6 of the UK Code for Sustainable Homes Response – The Code has been largely withdrawn and parts included within Building Regulations. The Council is not allowed to require higher standards than national policy except regarding energy performance, up to level 4 (5 and 6 must remain voluntary).
		11	The District Council points out that following the County Council’s Sept 2016 deletion of the Southwell Bypass there is no longer any need to maintain its previously safeguarded line. I welcome this. However, I am disappointed that the town and its residents have not been engaged by the District Council in looking at how this affects the preferred allocation proposals for the Town. I point out that this matter was raised in the recent elections that led to a significant change in representation of District Councillors for the town and it is important that the District Council reviews its Crew Lane Industrial Estate Policy Area.

			<p>It is clear that any future development, in many years' time in Southwell, for the avoidance of doubt I am referring to the 2030-2050 LDF, should not to be further west, further south or north of the River Greet. East of the town extension is possible and as it is closer to the town centre, with a bus service route close by, and closest to the railway station, should be the preferred expansion location - if any is required in 20 years' time or more years to come.</p>
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			<p>Therefore, the District Council should reconsider its approach to the land there, as shown below</p>
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Rather than sterilising the land to the south of Crew Lane with industrial land which would significantly reduce the desirability and deliverability of any further residential use to the east of the light industry, the land to the south of Crew Lane should be allocated, in due

			<p>course, for residential use. So/Ho/7 should be extended to include all of the land to the south of the old depot and this be used as an access to potential residential land south of Crew Lane as above</p> <p>I, therefore, propose alterations to So/E/3 and So/Ho/7 in the Amended Allocations & Development Management DPD. This would include the amendment of the existing allocations but no increase in planned development numbers or overall size. For future long term development, it would add the extension of potential residential land to the east of Metcalfe and Bramley Closes, including the old District Council depot and adjacent brown field site to the north.</p> <p>Response – Noted – The Council agrees with the proposal by several parties including this representor that So/E/3 would be better considered for other uses in future reviews of the plan. The proposed approach to this will be set out in the Options Report. The potential to increase the size of So/Ho/7 will also be investigated in formulating the Options Report.</p>
		14	<p>Disappointed that yet again the District Council and its Planning Policy officers do not engage with a community prior to making draft policies that are then released for 'consultation'. There should have been much more extensive work with a community before any paper is drafted.</p> <p>Response – The Plan Review process has been extended by the slow progress that the Amended Core Strategy took to adoption, therefore the Council thought it important to relaunch the process of reviewing the allocations and development management policies with an Issues Paper setting out what had occurred so far and what matters would be considered going forward. In line with the Council's Statement of Community Involvement further consultation will occur on an Options Report and Draft Plan.</p>
8	National Trust	8	<p>It would be beneficial to link the Open Space Strategy with Newark's Green Infrastructure Strategy, aiming to expand, improve and link multi-functional green space across the district area and beyond.</p> <p>Response – Noted.</p>
		9	<p>The ability of Parish's to designate Local Green Spaces (e.g. in association with their neighbourhood plans) will vary from place to place. We therefore suggest that the Council takes an overarching view to ensure that Local Green Spaces can be designated where appropriate across the plan area.</p> <p>Response – Noted – however the Council does not think it is best placed to deliver such a process.</p>
		2, 10, 11	<p>Yes. Response – Noted.</p>
9	Notts County Council	14	<p>Thank you for your email dated 10th July 2019 requesting strategic planning observations on the above document. I have consulted with my colleagues across relevant divisions of the County Council and have the following comments to make.</p> <p>The District Council is currently undertaking a Plan Review of its Local Development Framework and following the adoption of the Amended Core Strategy (March 2019), NSDC is now updating its Allocations and Development Management DPD. Within this Issue and Options document, NSDC is not proposing to allocate any new housing or employment sites but to update the ongoing suitability of its existing allocations. The County Council has previously provided minerals and waste safeguarding comments on these allocation sites as per the policies contained within the Nottinghamshire Minerals Local Plan and the Nottinghamshire and Nottingham Waste Core Strategy (adopted</p>

December 2013). This raised some points in relation to several active mineral and waste sites within NSDC that were nearby to some allocation sites. The below therefore provides an update to these previous comments and provides an outline of potential safeguarding concerns. The County Council will provide further information and detail through the County Councils Strategic Planning response as these sites come forward as planning applications.

Minerals

In terms of minerals, as these are a finite resource, the Publication Version of the Nottinghamshire Minerals Local Plan as per National Planning Policy Framework (para 204) contains a policy, SP7, which safeguards areas of potential mineral resource. The Policy designates Mineral Safeguarding and Consultation Areas (MSA/MCA) and where non-mineral development is proposed in these areas, the applicant will need to demonstrate it will not needlessly sterilise the mineral resource. Although the plan is not yet adopted, its provisions should be given some weight as a material consideration. Within the Newark and Sherwood District boundary, there are three MSA/MCA: sand and gravel, brick clay and gypsum and the below site allocations fall within them:

Sand and Gravel

- NUA/E/4
- NUA/MU/1
- ST/MU/1
- Co/MU/1

Brick Clay

- Bi/Mu/1
- OB/E/3
- So/Ho/2
- So/Ho/5

Gypsum

- OS 4 (previously NUA/Ho/5)
- OS 5 (previously NUA/Ho/10)
- NAP 2B
- NAP 2A

For the majority of these sites, other than those further detailed below, as per Policy SP7 the applicant would need to demonstrate it will not needlessly sterilise minerals and where this cannot be demonstrated, and there is a clear need for non-mineral development, prior extraction

will be sought where practical. In some cases, large scale prior extraction might not be practical, however consideration should also be given to the potential use of minerals extracted as a result of on-site ground works rather than simply treating them as a waste material.

In terms of OB/E/3, the site is approximately 890m, at the closest extent, to the active Kirton Brickworks. It would therefore be recommended that any potential applicant contacts the operator, Forterra Building Products, to discuss prior extraction of brick clay. Whilst the emerging Publication Version of the Minerals Local Plan does not allocate any extensions to the brickworks, Policy MP6 outlines how if any applications are received, they will be supported where it can be demonstrated there are insufficient reserves, with National Policy requiring Brick Clay sites to have a 25 year supply. It is not considered that this employment allocation would sterilise the existing brick works and so the County Council would not consider the development to be inappropriate in this location, however it should be demonstrated there is a sound argument that identifies a clear and demonstrable need for the nonmineral development and that the practicality of prior extraction has been fully considered.

The South-Eastern part of strategic allocation NAP 2A covers the current active opencast gypsum quarry Bantycok. As detailed in the Amended Core Strategy (March 2019) this South-Eastern area is identified as existing and future mineral extraction and the area around the processing plant is allocated for proposed industrial use. Currently the quarry has permission to extract gypsum until 2027 though it is anticipated, due to the current rate of extraction, reserves will be adequate until 2023. To ensure sufficient provision of gypsum, the Publication Version of the Minerals Local Plan allocates a Southern extension through Policy MP7c which will extend the quarry life for another 15-24 years, dependent on the rate of extraction. This allocation area falls outside NAP2A boundary and further detail of the allocation can be found here: <https://www.nottinghamshire.gov.uk/planning-andenvironment/minerals-local-plan/publication-version-documents> with Inset 15 in appendix three (page 178) displaying the existing and proposed allocation.

Waste

In terms of the Waste Core Strategy, Policy WCS10 seeks to safeguard existing permitted waste management facilities and potential future sites from sterilisation from other development uses. The policy though does not seek to restrict development but to take a flexible approach so to accommodate development. For example, taking consideration of any nearby waste management facilities in a site plan layout, which could include using parking or landscaping as a buffer zone from any existing or potential waste use. In terms of the allocations included within the Allocations and Development Management DPD, some are nearby to permitted waste management sites and so the County Council has the below comments to make.

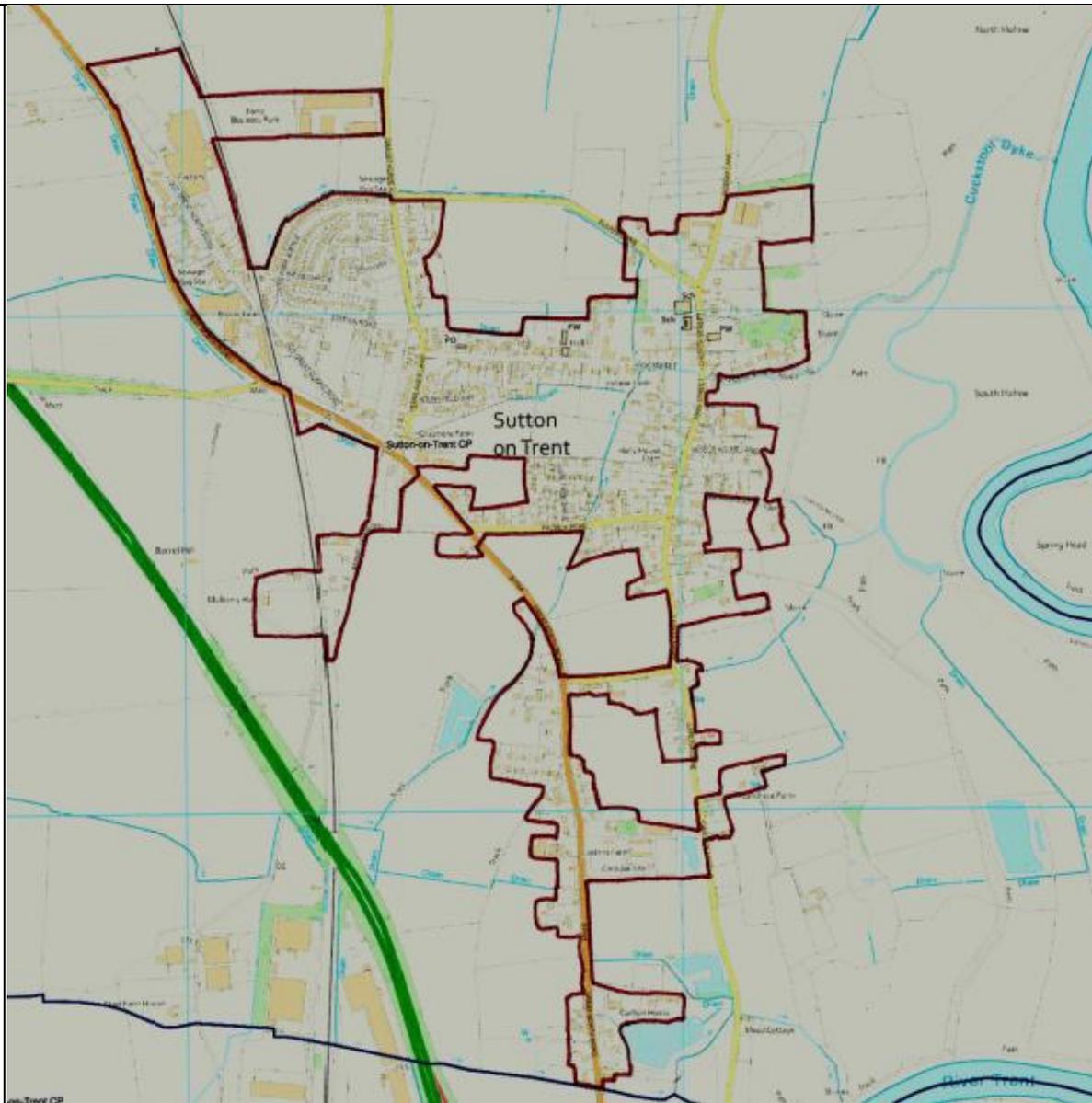
Within the large NAP 2A strategic allocation, within the green infrastructure area designated by the Amended Core Strategy is Quarry Farm, where there are several permitted waste management facilities, including several Waste Transfer sites. Therefore, any proposed developments nearby to the site would need to consider the active waste management facilities in their application to avoid potential

			<p>sterilisation. Such a flexible approach and consideration should also be considered for development at the allocated site NUA/Ho/4 which is close to the active household waste recycling centre, located to the East of Brunel Drive.</p> <p>In terms of OS 1 (previously NUA/Ho/7) and NUA/Ho/9, part of Opportunity Site One (Tarmac Site Hawton Lane/Bowbridge Road) does have permission to operate as a waste transfer site. However, it currently has unauthorised waste on the land which the Environment Agency is currently dealing with. It is not the intention of Policy WCS10, as explained in the supporting text of paragraph 7.49 of the Waste Core Strategy, to safeguard unauthorised or inappropriate waste facilities. However, in this case there is an authorised waste management use on the site which has been operated in breach of planning control Therefore the County Council is not seeking to safeguard any of the unauthorised activities but simply to ensure that the principle of the permitted waste management use at this site is taken into account in future planning decisions.</p> <p>As a note to the Local Planning Authority, part of the NUA/Ho/8 site contains unpermitted general waste which has been stored here since 2015 and to the rear (eastern) part of the site was subject to unauthorised inert waste processing operations but these have now ceased. There have been ongoing discussions between the landowner, the Environment Agency, Nottinghamshire County Council and Newark and Sherwood District Council about the removal of this waste. At the time of writing, an enforcement notice has been served by Nottinghamshire County Council requiring the landowner to remove the waste which has been deposited on the site without planning permission within a 3-month period. The landowner appealed this enforcement notice which was dismissed by the Inspector and the waste is beginning to be removed. It is not the intention of Policy WCS10 to safeguard unauthorised and inappropriate development and so the County Council but should the development proposals move forward, they should not prejudice or delay the removal of these waste materials.</p> <p>For all allocations, the sites should consider Policy WCS2: Waste awareness, prevention and re-use, and consider how any proposals could be ‘designed, constructed and implemented to minimise the creation of waste, maximise the use of recycled materials and assist the collection, separation, sorting, recycling and recovery of waste arising from the development.’ In accordance with this, as the allocation sites are likely to generate significant volumes of waste through the development or operational phases, it would be useful for applicants to be support any application with a waste audit. Specific guidance on what should be covered within a waste audit is provided within paragraph 049 of the Planning Practice Guidance.</p> <p>Response – The site specific advice is welcomed. Where it is relevant, account will be taken of the emerging Nottinghamshire Minerals Local Plan and the Nottinghamshire and Nottingham Waste Core Strategy.</p>
10		1	<p>An assessment of compliance against the Core Strategy is also required. There also needs to be a view taken as to whether DM policies are actually required on some topics given that the NPPF envisages Local Plans to predominantly cover strategic policies.</p>

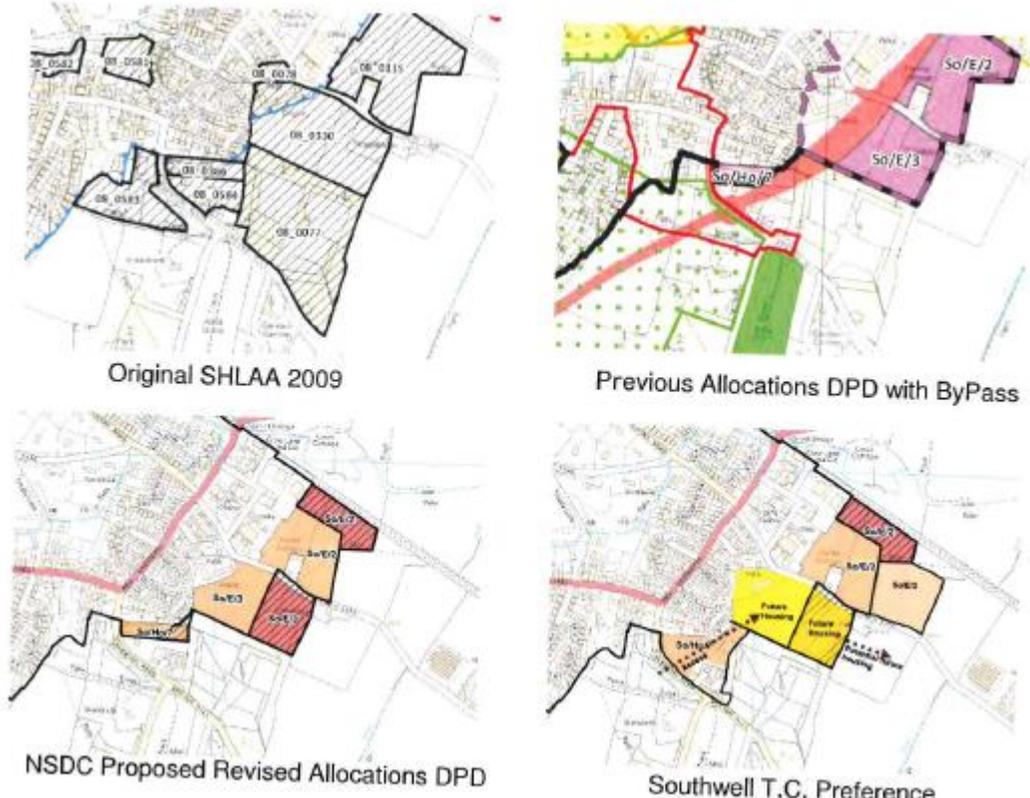
Anthony Northcote obo various clients		<p>Policy DM8 as an example uses reference to main built up area which was removed from Spatial Policy 3. Policy DM8 needs to be clarified, it doesn't cover every possible form of development but in decision making the LPA has sought to use omission from the policy to justify refusal - this was deemed incorrect by an Inspector and resulted in costs being awarded against the Council. The policy should be amended to make it clear that it only applies to the forms of development it specifies.</p> <p>Policy DM8 goes beyond paragraph 79 of the NPPF in resisting more than isolated dwellings. This needs to be considered, particularly in relation to the use of settlement boundaries for the larger villages which now means that fringe parts (and slightly detached parts) of bigger settlements are deemed in the countryside and unsuitable for development, but a similar detached part of an 'other village' under Spatial Policy 3 might be suitable for development. This inconsistency is most acute in relation to Sutton on Trent and needs to be reconsidered.</p> <p>Response – Paragraphs 2.1, 2.2 and 2.3 of the Allocations & Development Management Issues Paper address the Amended Core Strategy's compliance with the NPPF. The comments on DM8 are noted. It is intended to reword DM8 to reflect the changes to Spatial Policy 3 (SP3). The District Council is not intending to review village envelopes or urban boundaries as part of the Local Plan Review.</p>
	2	<p>Yes, the NPPF definition should be followed</p> <p>Response - Noted</p>
	3	<p>Yes, at present there is an approach to town centre boundaries, and primary & secondary retail frontages. This approach is out-of-date, town centres are contracting and time appears to need to focus the town centres more tightly to maintain their vitality. The policy also needs to take into account the increased p.d rights to change between various retail and other uses which calls into question whether any desire to protect streets from an increase in non-A1 uses can actually be effectively implemented today.</p> <p>Response –</p> <p>Noted. Considering the approach to the future management and extent of shopping frontages will form a key part of the review of Town Centre and Retail content in the Allocations & Development Management DPD. The intention is to provide for an updated policy approach, which continues to support vital and viable Centre's in challenging retail conditions. The implications from changes to PD rights is an issue, which will need to be taken account of.</p>
	4	<p>The fairly high thresholds in the NPPF are intended to be used unless local evidence clearly demonstrates a different approach. To date I'm not persuaded that robust local evidence justifies a different approach. In relation to leisure uses for example we have represented some clients who will not consider any town centre site because of client expectations regarding availability of free on-site car parking. Care needs to be taken not to undermine investment through too rigid an approach towards town centre first, particularly when Newark as an example has such large amounts of out-of-town competition in the leisure sector such that new provision if forced into the town centre is at a competitive disadvantage. Newark is not of a size where daytime demand from workers for leisure provision arises, there is also only limited evening demand from those living in and around the town centre for leisure provision.</p> <p>Response –</p> <p>Noted. The local retail impact thresholds within the Amended Core Strategy have been subject to examination and found sound, they are supported by the Town Centre & Retail Study prepared by Carter Jonas in 2016. It is important that any exclusion of small-scale retail</p>

		development from the impact test in particular is consistent with the broader approach provided by Core Policy 8. In terms of leisure development it remains crucial that DM11 continues to be able to properly support the town centre first approach for all main town centre uses. The extent to which this may involve allowing greater scope for non-retail main town centre uses within the current shopping frontages, or indeed other complimentary uses, will be central to the review of DM11, the need to support implementation of a future Town Centre Strategy is also a key consideration. It is therefore appropriate to give proper thought as to whether a locally impact test threshold should form part of the policy approach moving forwards, in order to ensure that the potential impact on the vitality and viability of the Centres (including in respect of planned intervention and investment) is taken into account when considering proposals located beyond them.
5		<p>The Core Strategy should have reviewed the settlement hierarchy as we requested, Farndon and Coddington are very large settlements which abut Newark but are not deemed part of the Newark Urban Area. However parts of allocations notably at the northern end of Newark fall within Winthorpe Parish which gives an anomaly between the definition of the Newark Urban Area and Parish boundaries. We requested the last boundary review to look to address this anomaly but unfortunately it didn't. The protected settlement breaks in some ways appear to have only a limited purpose as development on the edge of the 'other villages' is not permitted and outside of the settlement boundary of Newark is the countryside. The review should take into account the relationship to the proposed upgrading of the Newark bypass and the potential additional land take that may be required.</p> <p>Response – Noted – Planning definitions do not always align with Parish boundaries and this is not necessarily an impediment to implementation. The policy reflects the position that some forms of development which are acceptable under SP3 and DM8 could nonetheless cause Newark to coalesce with its neighbouring villages.</p>
6		<p>Yes - this is a location where a specific policy approach should be developed. In addition Tolney Lane should be included within the settlement boundary for Newark as at present this omission implies that the community are not part of Newark which is inappropriate.</p> <p>Response – Noted.</p>
7		<p>The approach should take into account the needs and preferences of the Gypsy and Traveller community.</p> <p>Response – Noted. The Gypsy and Traveller Accommodation Assessment will be largely based on primary data – providing an appropriate basis for understanding needs and preferences of the communities.</p>
8		<p>How this is to be managed in new developments, the Council does not like the use of management companies so alternative approaches such as Parish Councils or Trusts could be explored</p> <p>Response – This will be considered as part of the new Open Space strategy.</p>
9		<p>Yes - although the NPPF does allow for Local Plans to designate LGS, this is not a helpful mechanism through which to demonstrate that each LGS is demonstrably special. It would also prejudice future options for Neighbourhood Plans.</p> <p>Response – Noted.</p>
10		<p>No - where this is used in other LPAs it adds no value. In developing schemes in such areas we design proposals as clients want and then retrofit the traffic light assessment against the Building for Life standards. It is a tick box exercise that does not positively influence developments. A proper Design and Access Statement should cover the aspects covered in BfL, unnecessary duplication can and does arise</p>

	with emphasis then often placed on the BfL rather than the DAS. If it is proposed to be used then it should only apply to development on the strategic allocated sites. Response – Noted. The Council is considering whether to introduce a more standardised way of discussing layout and design with applicants the benefits of which we believe are clear for both parties. However the comments are noted and will considered as the policy developed.
11	We have no particular view - however in strict terms the Southwell Neighbourhood Plan should probably be reviewed in any event given that the NPPF and Core Strategy have both been updated since it was made. Response – Noted.
12	Sites which are under construction should not continue to be allocated, they should be shown as sites under construction. This is particularly important for site ST/MU/1 where the site under construction differs in geographic area to the site allocation as do the number of dwellings; and a purely housing scheme was granted rather than a mixed use as envisaged. Also the allocation is in flood zone 2 which conflicts with the requirements of the Core Strategy regarding allocating sites. The main open area should also be amended Sites which are under construction should not continue to be allocated, they should be shown as sites under construction. This is particularly important for site ST/MU/1 where the site under construction differs in geographic area to the site allocation as do the number of dwellings; and a purely housing scheme was granted rather than a mixed use as envisaged. Also the allocation is in flood zone 2 which conflicts with the requirements of the Core Strategy regarding allocating sites. The main open area should also be amended to reflect the areas required to remain undeveloped as part of the planning permission on ST/MU/1. Response – Noted. Where sites are under construction it is considered prudent to retain the sites as allocations. Should development stall for any reason any new applications will be determined in light of the provisions of the policy. Should the development be completed prior to later stages of the review process, they will be removed from the Plan at this stage.
13	This question cannot be answered as there are no up-to-date delivery indications given for the SUEs in Newark. Under the NPPF there is a far greater focus on deliverability and at numerous appeals, Inspectors have said that clear evidence on deliverability and phasing is required - for example agreed statements with landowners and developers about the delivery timescales/numbers on each site. As the Core Strategy was examined under the 2012 NPPF it did not consider this enhanced deliverability requirement so this DPD will be the forum through which this is tested. Response – Noted.
14	The settlement boundary of Sutton on Trent should be revised as per our suggested plan.



			Response – This is a Review of the Allocations & Development Management DPD and it is not considered appropriate to amend the village envelope at this time.
11	Sport England	8	<p>Please see our website which provides guidance on planning for sport and active recreation www.sportengland.org/facilities-and-planning/planning-for-sport/ at this stage the following issues would be raised</p> <p>Need to ensure that the evidence base is maintained up to date and Robust – Para 96 NPPF</p> <p>This includes the Playing Pitch Strategy and Built Sports Facilities Strategy.</p> <p>That new facilities are planned for positively para 92 NPPF</p> <p><u>Health and wellbeing</u></p> <p>Sport England, in conjunction with Public Health England, has produced ‘Active Design’ (October 2015), a guide to planning new developments that create the right environment to help people get more active, more often in the interests of health and wellbeing. The guidance sets out ten key principles for ensuring new developments incorporate opportunities for people to take part in sport and physical activity. The Active Design principles are aimed at contributing towards the Government’s desire for the planning system to promote healthy communities through good urban design. Sport England would commend the use of the guidance in the master planning process for new residential developments. The document can be downloaded via the following link: http://www.sportengland.org/activedesign Local plan policies can support the use of active design as a means of implementing the objectives of health and wellbeing</p> <p>Response – Noted. The existing Playing Pitch strategy will be integrated into the new Open Space strategy.</p>
12	Coal Authority		No Comments

13	Southwell Town Council		 <p>Original SHLAA 2009</p> <p>Previous Allocations DPD with ByPass</p> <p>NSDC Proposed Revised Allocations DPD</p> <p>Southwell T.C. Preference</p> <p>Response – Noted – The Council agrees with the proposal by several parties including this representor that So/E/3 would be better considered for other uses in future reviews of the plan. The proposed approach to this will be set out in the Options Report. The potential to increase the size of So/Ho/7 will also be investigated in formulating the Options Report.</p>
14	Sally Mottishaw	2	<p>Yes. Rural exception sites should not be excluded from the Greenbelt</p> <p>Response – Rural affordable exception sites are allowed adjacent to a number of green belt settlements.</p>
		6	<p>More sites required and needed</p> <p>Response- Noted. New pitch requirements will be included in the Amended Allocations & Development Management DPD, and a detailed approach to deliver the sites necessary to meet these requirements put in place – including site allocation where necessary.</p>
		7	<p>It should be easier for travellers to get sites on previously developed land</p>

			Response – the suitability of all types of land within the pool of potential site allocations will be considered as part of the review of the Allocations & Development Management DPD. Windfall gypsy and traveller proposals will be considered on their merits against the criteria within Core Policy 5 and other relevant content within the Development Plan.
		9	No. In Blidworth apart from the historical side of the old village there shouldn't be restricted green space. Response – Noted – all public open spaces are protected by SP8.
		12	Yes. Bl/Ho/1 land owner has had its allocation for years and not delivered it and has no intention of developing it and there are more suitable areas in village/ edge of village for development. Response – Noted. The local planning authority is satisfied that allocation Bl/Ho/1 remains deliverable.
		13	No. Response – Noted.
		14	Blidworth needs a complete all-encompassing green belt review round the entire village not selected sites. Response - The Green Belt review was undertaken as part of the production of the Allocations & Development Management DPD process and it was intended to be a one off and not a continual approach which would be revisited at every review of the Development Plan as set out in Paragraph 136 of the NPPF.
		3, 10, 11	Yes. Response – Noted.
15	Fisher German obo Land East of Kirklington Road Consortium of Landowners	11	<p>The Council's approach to link allocations to the Southwell Neighbourhood Plan is generally supported. The land to the East of Kirklington Road, Southwell (So/Ho/4) is deliverable. An application for a comprehensive scheme for the whole allocation will be brought forward as soon as the detailed site-specific survey work, which is currently being undertaken, is complete.</p> <p>Whilst the approach to link the allocations to the Southwell Neighbourhood Plan are supported in principle, the review of the Plan should not be bound by the content of the Neighbourhood Plan; particularly where more up to date information or evidence is available. Housing mix is an example of where the Review should reconsider the policies set out in the Southwell Neighbourhood Plan to ensure that they fully reflect up to date evidence of District wide Local Need.</p> <p>In addition to the above, the presence of a made Neighbourhood Plan should not constrain future development and should not prevent future allocations being made or identified as reserve allocations in sustainable locations through the Plan Review. It is recognised that the Amended Core Strategy was examined under transitional arrangements meaning the adopted housing requirement was based on an Objectively Assessed Housing Need (OAHN) rather than the Government's standard methodology for calculating Local Housing Needs. However, it should be noted that the Council's current adopted housing requirement figure is less than the Local Housing Need figure. It is therefore considered that the adopted housing requirement should be treated as a minimum and not a ceiling to development and that the Plan should allocate more land to ensure as large a contingency as possible is provided above the adopted housing requirement. In so doing smaller sites, in and around sustainable settlements such as Southwell have to be considered. Such an approach would not be contrary to the Southwell Neighbourhood Plan which sought to reflect the allocations already made in the adopted Allocations and Development Management DPD and prepared in the context of the Plan being reviewed.</p>

			Response - The Council has made sufficient provision for development within Southwell to meet the housing requirement and so consequently no fresh allocations are being considered for inclusion as part of the Review.
		12	<p>The Land East of Kirklington Road Consortium of Landowners are committed to the delivery of 45 dwellings on the allocation to the East of Kirklington Road (So/Ho/4). The site is deliverable. It is available now in its entirety, it offers a suitable location for development now, as evidenced by its allocation, and is achievable with the realistic prospect of the site being built out within 5 years. As set out previously the consortium of landowners are motivated to submit a single comprehensive planning application as soon as the necessary survey work for the site is complete.</p> <p>It is recognised that an application for the development of part of the allocation was refused in October 2018 (17/00605/OUTM). This does not mean that the site will not come forward or cannot be developed. The proposal was refused due to concerns that developing part of the site independently from the wider allocation would prejudice the delivery of the wider site; specifically, in respect of drainage. The Consortium of Landowners has been formed to address these concerns and ensure that a single comprehensive scheme is brought forward for the Council's approval. The outline planning application will be submitted with a Flood Risk Assessment and Drainage Strategy for the entire site. This, and supporting documentation including ecology assessments, an arboricultural report, highways appraisal, heritage statement, landscape and visual impact assessment, will all inform an indicative masterplan which will confirm the parameters within which the site will be brought forward for residential use.</p> <p>The landowners look forward to working with Officers, Members and the Community to deliver the land to the East of Kirklington Road.</p> <p>Response – Noted.</p>
16	GPS Planning obo Balfe Construction	5	<p>YES. Clearly many of the issues associated with the Open Break policy also integrate with the consideration of landscape and visual character, perception, openness and naturalness. An integrated approach is advised, linking these attributes with spatial and core policies. The assessment should be robust and follow a narrative structure rather than tabulated, in order to avoid criteria 'cancelling each other out' and allowing the analysis to draw out what is important in each location. The review of the Open Break policy should include a physical, perceptual and value assessment, elements for consideration in terms of landscape character should include topography, views and visual character and aesthetic qualities.</p> <p>Response – Noted the Council will consider a range of factors in reviewing Open Breaks including those mentioned. The purpose of Open Breaks is to retain openness. Where this creates opportunities for integration with other policy goals – this is beneficial - but they are incidental to the policy's aim of preventing coalescence.</p>
		2, 10	Yes Response – Noted.

17	GPS Planning obo Harlaxton Estates	5	<p>YES. Clearly many of the issues associated with the Open Break policy also integrate with the consideration of landscape and visual character, perception, openness and naturalness. An integrated approach is advised, linking these attributes with spatial and core policies. The assessment should be robust and follow a narrative structure rather than tabulated, in order to avoid criteria ‘cancelling each other out’ and allowing the analysis to draw out what is important in each location. The review of the Open Break policy should include a physical, perceptual and value assessment, elements for consideration in terms of landscape character should include topography, views and visual character and aesthetic qualities.</p> <p>Response – Council will continue to consider Open Breaks purely in terms of openness. Where this creates opportunities for integration with other worthy goals- such as with the Open Space/Playing Pitch strategy at Land South of Newark- these will be used. But they are incidental to the policy’s aim of preventing coalescence.</p>
		2, 10	Yes Response – Noted.
18	Pegasus Group obo Gascoine Group	2	<p>2. SECTION 3 – AFFORDABLE HOUSING</p> <p>2.1 The publication of the NPPF2 in July 2018 (revised February 2019) brought two significant changes with respect to affordable housing. Firstly, as detailed in Annex 2: Glossary, the definition of Affordable Housing changed. The NPPF defines affordable housing as follows:</p> <p>Affordable housing: housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the following definitions:</p> <p>a) Affordable housing for rent: meets all of the following conditions: (a) the rent is set in accordance with the Government’s rent policy for Social Rent or Affordable Rent, or is at least 20% below local market rents (including service charges where applicable); (b) the landlord is a registered provider, except where it is included as part of a Build to Rent scheme (in which case the landlord need not be a registered provider); and (c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision. For Build to Rent schemes affordable housing for rent is expected to be the normal form of affordable housing provision (and, in this context, is known as Affordable Private Rent).</p> <p>b) Starter homes: is as specified in Sections 2 and 3 of the Housing and Planning Act 2016 and any secondary legislation made under these sections. The definition of a starter home should reflect the meaning set out in statute and any such secondary legislation at the time of plan-preparation or decision-making. Where secondary legislation has the effect of limiting a household’s eligibility to purchase a starter home to those with a particular maximum level of household income, those restrictions should be used.</p> <p>c) Discounted market sales housing: is that sold at a discount of at least 20% below local market value. Eligibility is determined with regard to local incomes and local house prices. Provisions should be</p>

		<p>d) Other affordable routes to home ownership: is housing provided for sale that provides a route to ownership for those who could not achieve home ownership through the market. It includes shared ownership, relevant equity loans, other low cost homes for sale (at a price equivalent to at least 20% below local market value) and rent to buy (which includes a period of intermediate rent). Where public grant funding is provided, there should be provisions for the homes to remain at an affordable price for future eligible households, or for any receipts to be recycled for alternative affordable housing provision, or refunded to Government or the relevant authority specified in the funding agreement.</p> <p>2.2 In addition, the NPPF now includes a number of different provisions regarding Affordable Housing policy which were not previously included in national policy. The main differences between the two approaches are identified by the Issues Paper as:</p> <ul style="list-style-type: none"> • that previously Affordable Housing could not be secured on sites of 10 or less (i.e. 11 or more) and now they can be secured on sites of 10 or more. • that alongside the dwelling number trigger a combined gross floor space of more than 1000sqm was also included however now this has been replaced with a 0.5 hectares trigger. • that at least 10% of new dwellings to be available for affordable home ownership (with a range of exemptions to this) • that ‘entry-level exceptions sites’ should be supported by Local Planning Authorities. <p>2.3 The Council proposes that in order to address these policy changes that a new affordable housing policy is developed as part of the next stage of the Plan Review. Our client is supports and encourages the Councils approach to revise the Affordable Housing Policy to be reflective of National Planning Policy. Our client does however reserve the right to make further comment on this matter at a later date once the wording of the policy has been developed.</p>
	12	<p>1.3 Our clients land interest is District wide, however for the purposes of this response in considering Section 9, focus will surround two particular parcels of land. These are:</p> <ul style="list-style-type: none"> ○ Allocation NAP2B – Land East of Newark ○ Land at Oaklands Close, Collingham (SHLAA Ref. 16_0074) <p>3. SECTION 9 - HOUSING AND EMPLOYMENT ALLOCATIONS</p> <p><u>The Housing Requirement</u></p> <p>3.1 Section 9 of the Issues Paper considers both Housing and Employment Allocations in the District. Paragraph 9.1 of the Issues Paper states:</p>

“...It should be noted that even with the proposed amendments to reflect changes in circumstance to the allocation policies, sufficient capacity exists to more than meet the minimum requirements for both housing and employment in line with the Adopted Amended Core Strategy DPD. At this juncture we are not intending to identify any new allocations other than for Gypsy and Traveller provision...”

3.2 Our client does have concerns surrounding the Councils approach to not identify any new allocations for residential uses. The NPPF is clear that plans should be positively prepared, aspirational and significantly boost housing supply.

3.3 The housing requirements set out within the adopted Core Strategy should be viewed as a minimum requirement. Indeed, Spatial Policy 2 of the Amended Core Strategy states:

“...The housing requirements for Newark & Sherwood District between 2013 and 2033 are a minimum of 9080 dwellings...” (Pegasus Emphasis)

3.4 Therefore, if the plan is to achieve its housing requirement as a minimum, it stands to reason that additional sites are required to enable the plan requirements to be surpassed. Secondly, additional sites will ensure additional flexibility for the Core Strategy, which is important given that it has a plan period of 20 years over which circumstances can change. A buffer of sites will therefore provide greater opportunities for the plan to deliver its housing requirement. It is our view that this should be at least a 20% buffer. This approach is consistent with that put forward by the Home Builders Federation (HBF). Given this, in order to meet the requirements of the NPPF, additional housing allocations should be identified across the District.

Newark Urban Area

3.5 At Paragraph 9.6, the Council identify that within the Newark Urban Area the housing requirement is 5284 dwellings. Taking into account the houses built since 2013 and the sites which have planning permission and are likely to be delivered during the Plan period, this means that a residual minimum requirement of 1243 dwellings is required (as at 31 March 2019). This residual need is met by the remaining allocations which continue to be suitable and the Residual Strategic Site Allocations (NAP2B&C).

3.6 Our client welcomes that the Residual Strategic Site Allocations, in particular NAP2B, are anticipated to be delivered during the Plan Period and will contribute towards the Residual Need. This accords with the Amended Core Strategy which retains and recognises these strategic sites as being key to the delivery of the strategy, as set out in Spatial Policy 5 of the Core Strategy.

3.7 Whilst the removal of the Strategic Site Allocations is not proposed, it is stressed that their removal would be contrary to the Core Strategy, and the adopted Development Plan. Our client reserves the right to make further comment should the removal of the allocation NAP2B be proposed at any point during this DPD review.

Collingham

3.8 At Paragraph 9.11 of the Issues Paper, the Council identify that the development of Co/Mu/1 is considered to meet the requirement within the village, by more than 33 dwellings above the minimum requirement. Therefore, the Council consider that no further housing is required in the village over the Plan Period.

3.9 Our client opposes the Council's view that no further sites should be allocated in Collingham. Firstly, it is important to recognise that site Co/Mu/1 already benefits from outline planning permission with the Reserved Matter consents already granted or submitted. A number of the houses are already built. As such, aside from those that will be delivered in the next few years, Collingham will be subject to little or no residential development coming forward for the remainder of the Plan Period. This is clearly unsustainable for the settlement, which requires continued growth throughout the Plan Period. This is also contrary to the requirements of the NPPF which clearly states that plans should be positively prepared, aspirational and significantly boost housing supply.

3.10 For the above reasons, our client believes that additional housing growth should be proposed in the settlement. Collingham as a principal village in the District represents a sustainable settlement which we believe can accommodate residential development over and above that which it has been allocated. We believe the site at Oaklands represents an excellent opportunity for a residential allocation, and is sequentially preferable to others within Collingham which could accommodate site specific constraints, such as flood risk.

4. SUMMARY AND CONCLUSIONS

4.1 We trust the above representations are clear as to the basis of our Client, The Gascoine Group, view on the draft Issues Paper of the Review of the Allocations and Development Management DPD.

4.2 Whilst our Client supports the need to review the DPD, the document must be produced in a robust and sound manner. Currently our Client believes there are a number of flaws within the issues paper which will ultimately frustrate sustainable development from coming forward and the delivery of housing across the District.

4.3 The NPPF is clear in the need to significantly boost housing supply, changes are therefore required to ensure that DPD delivers more than the minimum housing requirement and to ensure the document is sufficiently flexible and adaptable over the plan period to enable sustainable proposals to come forward and ultimately be deliverable.

Response – The Council has made sufficient provision for development within the District to meet the housing requirement along with additional flexibility in the form of opportunity site and so consequently no fresh allocations are being considered for inclusion as part of the Review.

19	Upper Witham IDB	14	Generally Newark & Sherwood DC have the appropriate policies with regard to flood risk and land drainage. Response – Noted.
20	Gladman Developments Ltd	2	Yes. Gladman considers that it would be prudent to update the affordable housing policy to reflect the latest position set in national policy. The Council will need to be mindful of the need to carry out a review of its affordable housing needs evidence base to ensure that any subsequent policy requirement is supported by robust evidence on need and viability. Reviewing the existing affordable housing policy is not the only mechanism at the Council’s disposal to ensuring affordable housing is delivered to meet identified housing needs. The Council should also be mindful of the fact that the total affordable housing need should be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, taking into account the probable percentage of affordable housing to be delivered by eligible market housing led developments. The Council should therefore seek to identify additional housing land so that it allows for choice and flexibility in housing land supply as well as helping to deliver the required number of affordable homes over the plan period. Response – Noted. The District Council agrees with Gladman that provision of affordable housing via new development schemes is not the only method for securing additional affordable housing. Indeed not only does the Council have a flexible land supply but it has a significant programme of Council House building (330 dwellings). Looking in detail at the at the figures since 2011/12 around 21% of housing on qualifying sites is affordable.
		5	Gladman considers that the Open Break designations at Coddington, Farndon and Winthorpe should be revised through the Local Plan Review. Whilst it is acknowledged that these are longstanding designations remaining from the County Development Plan, these were prepared in accordance with previous national policy which took a restrictive approach to development in the countryside. Gladman submits that new development can often be located in countryside gaps without leading to the physical or visual merging of settlements, eroding the sense of separation between them or resulting in the loss of openness and character. In such circumstances, we would question the continued purpose of a gap designation, particularly if this would prevent the development of otherwise sustainable and deliverable housing sites to meet the districts housing needs. If the Open Break designations are to be retained, then this will need to be supported by a robust evidence base and landscape character assessment. Gladman reserves the right to comment on this policy at a later stage once the evidence has been made available for comment in future iterations of the plan. Response – Such a policy approach continues to have support at national level. It is intended that a robust evidence base document will support the proposed review.
		10	Whilst Gladman acknowledges the importance of high quality design, planning policies should not be overly prescriptive and need flexibility in order for schemes to respond to site-specific constraints and the character of the local area. There will not be a one size fits all solution in relation to design and sites will need to be considered on a site by site basis with consideration given to various design principles. In seeking to apply Building for Life 12 standards, the Council should allow for flexibility within the policy wording so that developers are ‘encouraged’ to have regard to Building for Life 12 standards (where necessary). Furthermore, the use of Building for Life 12 should be

			<p>voluntary at the discretion of the developer so that it does not lead to undue policy burdens being put in place which may affect development viability. The following wording is put forward for the Council’s consideration to assist in the drafting of such a policy: “Developers are encouraged to take into account the principles outlined in Building for Life 12 (or its successor) when considering the design of a development proposal.”</p> <p>Response – Noted. The Council is considering whether to introduce a more standardised way of discussing layout and design with applicants the benefits of which we believe are clear for both parties. Given the standard is limited to urban design issues and does not seeks to introduce specific standards of building design and performance the Council understands that the viability implications are limited. However the comments are noted and will considered as the policy developed.</p>
	12,13		<p>Gladman notes the context in which the Plan is being prepared and the need of the site allocations to look again at a range of matters and issues, principally the need to accommodate the needs of Gypsy and Traveller sites, the reconsideration of previously identified sites as ‘Opportunity Sites’ and changes to development management policies. Whilst the Council is still in the early stages of plan preparation, the changes to national policy required by the NPPF 2019 must be carefully considered by the Council as it develops its emerging Local Plan. To support the Government’s continued objective of significantly boosting the supply of homes, it is important that the Local Plan Review provides a sufficient amount and variety of suitable sites that can come forward where they are needed and ensure that the needs of groups with specific housing requirements are addressed and land with permission is developed without unnecessary delay.</p> <p>Whilst it is accepted that the AADMDPD is still very much in its infancy in terms of plan preparation, in order to ensure that the housing requirement can be delivered in Newark & Sherwood, the Plan will need to be flexible and ensure that it identifies a wide range of sites, site size and site locations to provide for all aspects of the housebuilding industry to deliver identified housing needs.</p> <p>It is noted that the AADDPDPD does not seek to allocate any additional housing land but instead ‘identifies’ a number of opportunity sites. These sites have previously benefited from allocation in previous plans and/or planning consent but development on these sites has not yet materialised. As such, these now appear to be essentially broad locations for future growth as opposed to allocations identified in the Plan. In this regard, the Council should be mindful of the significant changes to the definition of deliverable introduces through the NPPF (2019). Importantly, the new definition places the onus on the local planning authority to demonstrate that sites within its housing land supply are capable of coming forward within the next five years. It states:</p> <p>“To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:</p> <p>a) Sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within</p>

			<p>five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans)</p> <p>b) Where a site has outlining planning for major development, has been allocated in a development plan, has a grant of planning in principle, or is identified on a brownfield register, it should only be considered deliverable where there is a clear evidence that housing completions will begin on site within five years.”</p> <p>Gladman is concerned that the Council’s decision to not allocate additional housing land does not provide sufficient flexibility within the Council’s housing land supply. Given that a number of the proposed opportunity sites have previously been identified as allocations and/or benefited from planning consent but development has yet to commence on site raises concerns on the deliverability of these sites. These sites offer no guarantee of coming forward and are unlikely to provide an effective response to a housing shortfall should it become apparent that housing is not being delivered as anticipated on the remaining allocated sites identified in the Amended Core Strategy. As such, the Council should seek to identify additional housing land opportunities that can come forward which will increase the housing land supply and offer additional flexibility within the Council’s supply of housing land.</p> <p>Although Gladman does not wish to comment on existing allocations, we consider further flexibility needs to be provided in the AADMDPD. Should any delays occur against the initial housing delivery projects as currently seems to be the case with the opportunity sites then this will result in a situation whereby the development needs of the area are unlikely to be achieved over the plan period. It would also mean that the Council’s ability to demonstrate a flexible and rolling five-year housing land supply would be put in jeopardy.</p> <p>In order to secure the deliverability of the Plan, Gladman considers that the AADMDPD should identify additional housing land and allow for additional flexibility so that sites, not allocated through the Plan, can come forward to accommodate any slippage which may occur in respect of the existing identified sites. This will also aid the Council in delivering additional housing in sustainable locations both in mix and location of sites across the settlement hierarchy and help improve the delivery of much needed market and affordable housing.</p> <p>The Council will need to provide clear evidence to demonstrate that the opportunity sites and sites within its housing land supply are deliverable and can commence in the next five years.</p> <p>Response – The Council has made sufficient provision for development within the District to meet the housing requirement along with additional flexibility in the form of opportunity site and so consequently no fresh allocations are being considered for inclusion as part of the Review. Using the amended definition of deliverable, the District council is confident that it has a deliverable five year land supply.</p>
21	Highways England	14	Highways England welcomes the opportunity to comment on the Allocations and Development Management Issues Paper. We note that the document provides details on a number of policies for which consultation responses will be used to inform review of Allocations and Development Management Development Plan Document (DPD).

			<p>Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth. In relation to this consultation, our principal interest is in safeguarding the operation of the A1 and A46 which route through the Plan area.</p> <p>We have had significant previous engagement with the Council in the preparation of its Development Plan, most recently in September 2018 when we provided a response to the Modifications to the Publication Amended Core Strategy. Throughout our engagement, we have maintained our position that development in Newark and Sherwood has potential to impact significantly upon the operation of the A46 and A1.</p> <p>Our comments remain the same in that we welcome the fact that any large strategic sites with the potential to impact upon the operation of the SRN will be subject to Transport Assessments in order for their impacts to be appropriately assessed.</p> <p>We have no further comments to provide and trust that the above is useful in the progression of the Allocations and Development Management DPD. <u>Response</u> – Noted.</p>
22	Barton Willmore obo Urban & Civic Plc	12	<p>Urban & Civic Plc are the Master Developer delivering the Sustainable Urban Extension at Newark South. Newark South benefits from a strategic site allocation taken forward in the Amended Core Strategy (adopted March 2019) under Area Policy NAP 2A Land South of Newark. Newark South also benefits from outline planning permission (with means of access in part) under application 14/01978/OUTM. This planning permission is currently being implemented. Phase 1 of the Southern Link Road is substantially complete and open, two housebuilders (Avant Homes and Bellway) are on site delivering dwellings as part of Phase 1, and a third housebuilder (Countryside) has submitted reserved matters. <u>Response</u> – Noted.</p>
		13	<p>As set out in response to Question 12, Urban & Civic Plc are the Master Developer delivering Newark South, a strategic site allocated in the Amended Core Strategy. The Issues Paper identifies two Opportunity Sites adjacent to Newark South - OS1 (270 dwellings) and OS3 (210 dwellings). Paragraph 9.66 of the Issues Paper states that: "Much of the development within the Newark Urban Area relies on the 3 strategic sites coming forward within the Plan period. The identification of opportunity sites will provide extra flexibility ... if development of the allocated sites does not progress as anticipated." However, the Issues Paper, at paragraph 9.63, states that "... there is nothing to prevent these sites coming forward for housing development at any point in the Plan period ...". Opportunity Sites should not come forward that may affect delivery of Newark South, a strategic site on which construction has commenced and housing delivery is underway. The Newark South development is delivering significant infrastructure, not least the Southern Link Road</p>

			(SLR) which is to facilitate planned wider growth in Newark and not just Newark South. Moreover, delivery of dwellings at Newark South is dependent on delivery of infrastructure, including occupation of more than 600 dwellings being dependent on Phase 1 of the SLR being completed and occupation of more than 700 dwellings being dependent on commencement of construction of Phase 2 of the SLR. Urban & Civic would object to Opportunity Sites coming forward whilst development at Newark South is constrained. Response – Noted.
		14	We reserve the right to comment on all policies coming forward at future consultations. Response – Noted.
23	Collingham Parish Council	1	Yes . No . Response – Noted
		2	Yes Response – Noted.
		3	Yes - a review of Newark, Ollerton and Southwell Town Centres and their extents as part of the production of the Amended Allocations & Development Management DPD appears to be a sensible approach Response – Noted.
		4	The policy change to enable retail landlords to convert commercial space to residential dwellings needs to ensure that the land lord has tried to market and let the properties and provide sufficient evidence of this, before the change of use is considered. If prospective tenants are unable to contact the landlord and no marketing has taken place - change of use should not be considered Collingham is referred to in Policy DM11 as a local centre - If a review of this policy is to be undertaken, the Parish Council should be included in this process to ensure that the developed policy continues to support the needs of the local area Response – Noted. Considering the approach to the future management and extent of shopping frontages will form a key part of the review of Town Centre and Retail content in the Allocations & Development Management DPD. The intention is to provide for an updated policy approach, which continues to support vital and viable Centre’s in challenging retail conditions. The implications from changes to PD rights is an issue, which will need to be taken account of.
		5	The current Open Breaks provide the separation required to allow the settlements to retain their separate identities. It is unclear what benefit can be gain by undertaking a review. For example, Winthorpe has a natural break from Newark with the A1 and other local infrastructure being used as the boundary - how would a review possibly change this? Response – The previous review, in 2012, was high-level and we believe a detailed and comprehensive review will support the policy’s use in decision-making.

6	<p>Yes. If there was a specific policy Area, this could define the needs of the area and address them in the best way for its local residents and tackle the local issue currently presented</p> <p>Response – Noted.</p>
7	<p>No Response – Noted.</p>
8	<p>Provision of small open spaces on small developments, places an unnecessary additional financial burden on the maintaining authority. Investing the same money on the existing facilities in a village environment, would provide additional interest whilst minimising the additional maintenance costs associated with a remote site.</p> <p>Response – Noted. There is always a balance to be struck between additional open space and improving existing facilities.</p>
9	<p>No. If a Parish Council does not wish to undertake a Neighbourhood plan at the current time or is in the process of preparing a neighbourhood plan - they would currently be using the NSDC policy in relation to this. If NSDC have no policy in place, where does this leave the Parish Council? It would be helpful for NSDC to have a policy in place, for any Parish/Town Council which currently doesn't have a Neighbourhood Plan.</p> <p>Response – Policy SP8 provides protection for all public open space.</p>
10	<p>Yes - However it is unclear how this could be implemented</p> <p>Response – Noted – it will be implemented through an amendment to DM12.</p>
13	<p>We have been unable to find any information in the documents with regard to "SUEs". However from the preceding text in the consultation document this would appear to be Newark focused and this Parish Council is therefore not in a position to provide a detailed response. The Collingham reserved land is acceptable to the Parish Council and provides an ideal location for future major development in both the village and the Parish.</p> <p>Response – Noted.</p>
14	<p>The Parish Council are in agreement with the sites allocation for the Parish in both the existing and the current plan and the retention of the current "village envelope". It is however a concern that whilst sites are not allocated in either document, planning has been approved for the access to another site for an additional 16 dwellings on a site which is not included in the allocations. Para 9.9 of the issues paper – under “employment and housing” mentions that two responders of eleven would like to promote additional allocations in the village at Manor Road and Oaklands. One of the areas is designated in the MOA and the other is outside of the village envelope. The Parish Council are pleased to see that neither of these suggested allocations is being considered and fully support this decision.</p> <p>Whilst it is appreciated that the number of dwellings allocated in the plan period is a floor and not a ceiling, there must be consideration given to the designation of a principal village, with an A road running through the middle (High Street), will all junctions</p>

			<p>on to the High Street being of less than the minimum standard and how much further the village can expand without this issue being addressed.</p> <p>Response – Noted.</p>
24	Harris Lamb obo CB Collier NK Limited	13	<p>It is our view that Opportunity Site 3, Flowserve, should be allocated for housing development, particularly given the loss of several allocations from the draft plan. The Flowserve site is subject to no more uncertainty over timescales for delivery than the proposed site allocations. Indeed, given that the site is subject to a groundworks application for remediation, with the clear purpose of preparing the site for residential development and is also the subject of a current planning application for residential development, there is clear intent to bring the site forward for development in the early part of the plan period.</p> <p>The principle of residential development on the site has been established by previous planning permissions 07/01840/OUTM, granted in 2009, and 12/00561/OUTM, granted in 2013. Whilst these permissions have expired, they demonstrate that the principle of residential development on the site has already been considered to be acceptable by NSDC. The acceptability of residential development on the site has been further confirmed through recent pre-application discussions with officers. Officers accepted that the residential development of the site would be in accordance with Policy DM1 of the ADMDPD 2013 which supports development within the settlement boundaries.</p> <p>There have been no material changes to the development plan since the previous applications were approved and no material changes within the recently adopted Core Strategy that would affect the acceptability of the site for development. The development of the site for residential use is in accordance with the development plan, specifically Strategic Policies 1 and 2 of the Core Strategy which seek to accommodate 60 per cent of the district’s Housing requirement within the Newark Urban Area.</p> <p>National planning policy is also highly supportive of the development of the site for residential purposes. In particular, paragraph 118 of The Framework states that LPA’s should:</p> <p><i>c) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land;</i></p> <p><i>d) promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively ...</i> <i>(our emphasis)</i></p> <p>There is a current outline planning application for residential development, reference 19/00854/OUTM. Planning permission for the demolition of existing buildings, remediation of site, formation of drainage pond, de-culverting and formation of new watercourse and raising</p>

			<p>of ground levels to create a development site was granted on 5/3/19, reference 18/01235/FULM. The site is both available and achievable. Start on site is envisaged in early 2021, with completion taking place in mid-2026.</p> <p>Potential contamination issues were investigated under planning application reference 18/01235/FULM and suitable mitigation measures have been agreed with the council. A small proportion of the site lies within Environment Agency Flood Zone 3, and part of the site lies within Flood Zone 2. This matter has been addressed by the current outline planning application proposal which seeks to both remove developable areas from the floodplain and achieve flood risk betterment off-site, for properties downstream. The proposed development will take account of and address any detrimental impact on any potential protected species habitats. Mitigation will be provided against any detrimental impact to the adjacent Local Wildlife Site. This matter has been addressed under application reference 18/01235/FULM. The current outline planning application proposes the retention of those trees on site which are the subject of Preservation Orders. The proposed development will take account of the existing Public Rights of Way within the site.</p> <p>Response – Noted. The site being identified as an opportunity site rather than an allocation will not prevent any development from taking place.</p>
25	GHM Planning Ltd obo Mr Tony Barrowcliffe	1, 2	Yes Response – Noted.
		14	<p>With regard to Lowdham the proposals state the housing requirement is 9 dwellings and that since 2013 three above this minimum requirement have been provided. The report concludes that sufficient provision has been made to meet the requirement and it is not proposed to make any changes to the allocations for Lowdham. However, this conclusion pre-dates the results of the pending Housing Needs Survey for Lowdham which may conclude a far higher number of houses are required for the village. This would accord with a previous survey which identified a far greater number of houses were sought in the village than the 9 above. It appears by not taking into account the results of the pending housing needs survey the Council is making the housing needs survey superfluous. Furthermore, by not proposing further housing allocations, especially to meet local needs, the development opportunities that will result from the A614 works, including to the Lowdham roundabout, would not be maximised when the main point of these works is to facilitate growth opportunities along the A614 corridor.</p> <p>Response – Lowdham is tightly constrained by both the Green Belt and areas at risk of flooding. The Green Belt review was undertaken as part of the production of the Allocations & Development Management DPD process and it was intended to be a one off and not a continual approach which would be revisited at every review of the Development Plan as set out in Paragraph 136 of the NPPF. The results of the Housing Needs Survey for Lowdham will be considered as part of the consideration of any windfall applications.</p>
26	Farndon Parish Council	1	<p>The Parish Council recognises and agrees with the assessment of compliance with the NPPF 2019. The District Council now needs to implement the comments, particularly regarding the new national policy on nationally important but non-scheduled assets of archaeological interest and development in the open countryside.</p> <p>Response – Noted</p>
		2	Yes Response – Noted.
		3	It should be reviewed but with the focus on ensuring that retail development be retained within the town centres.

		<p>Response – Noted. Considering the approach to the future management and extent of shopping frontages and the uses appropriate within them will form a key part of the review of Town Centre and Retail content in the Allocations & Development Management DPD. The intention is to provide for an updated policy approach, which continues to support vital and viable Centre’s in challenging retail conditions.</p>
4	<p>The District Council should resist out of centre developments to ensure that the Centres remain vital and viable. That includes resisting office developments that would remove spend from the Centres.</p> <p>Response – Noted. All proposals for main town centre uses (including offices) are subject to Sequential Test which seeks to direct such development as a first preference to locations within Centres, then edge of centre before considering out-of-centre. This approach is reflected in Core Policy 8 and will not be altered through the review of DM11.</p>	
5	<p>The village of Farndon is protected by two open breaks, one between Crees Lane, Brockton Avenue and Fosse Road; the other between the dualled A46, and Fosse Road. These open breaks are extremely important to the village as it ensures a buffer zone between the village and Newark. One of the open breaks, the one between the A46 and Fosse Road, is currently under threat as a planning application has been submitted and little reference has been made to the fact that this land is protected under Policy. Any detailed review should take account of the importance of the open break to the community and high importance should be given to retaining them. The Parish Council has submitted a separate, more detailed, response to the review of the Open Breaks.</p> <p>Response – Noted.</p>	
6	<p>It would make sense for there to be a policy for the area if there are not already policies in existence that cover the development that comes forward for Tolney Lane. If policy already exists then that should be implemented on every occasion and carried through by Members and Officers.</p> <p>Response- Noted. There is no current policy area defined and so it is through the combination of gypsy and traveller and other relevant policy content in the Development Plan and national planning policy that proposals are determined. Consideration is being given to what role Tolney Lane can play in the future and for how to best plan to meet the needs of gypsy and traveller communities through the review, including whether a Policy Area would assist in this.</p>	
7	<p>Site allocation should be correct for all the community involved, not just for one section of it.</p> <p>Response- Noted. Core Policy 4 in the Amended Core Strategy provides a geographic basis for the allocation of land to meet gypsy and traveller needs, with the criteria in Core Policy 5 providing an appropriate basis to ensure that potential sites are suitable in terms of their potential impact.</p>	
8, 9	<p>Open Space should be maintained for the benefit of all and any threat to it should not be entertained. It should automatically be considered as important as the Green Belt and protected as such.</p>	

			<p>Response – Green Belt is afforded a high level of protection which national policy does not support for more general use. New and existing Open Spaces may be identified through a Neighbourhood Plan and protected as Local Green Space but Council cannot make the process “automatic”. SP8 is considered strong enough for general purposes.</p>
		10	<p>Yes, buildings should always be built to the highest possible standard and their design should not impact on the character of the area they are proposed for.</p> <p>Response – Noted.</p>
		11	<p>That is a matter for Southwell Town Council and the communities that would be affected by such an approach.</p> <p>Response – Noted.</p>
		13	<p>Yes, but given the number of dwellings contained within those opportunity sites there must be the infrastructure in place to support them and existing residential areas.</p> <p>Response – Noted.</p>
27	Claire Pendle Planning	5	<p>The consultation document reviews the three open breaks, currently designated around the Newark Urban Area. In doing so, it notes that they are long standing designations, present in some form or other within each successive statutory development plan covering the Newark area since 1964. They exist to ensure the settlements retain their separate identities and characteristics, and to prevent coalescence in locations where there is a pressure for development. Importantly, the documents note that the extent of the current designations, and associated policy wording, was subject to examination as part of the Allocations & Development Management DPD in December 2012 and by implication found sound by the examining Inspector, appointed on behalf of the Secretary of State. Newark urban area is the main location for new development of all types within the District and it sits, appropriately, at the top of the spatial strategy within the Amended Core Strategy. The spatial strategy has planned for the growth needs of the Borough in such a way that development is directed to Newark and, whilst a town centre first approach has correctly been taken for town centre and other employment uses, a number of major urban extensions are planned. The open breaks exist to protect the form and pattern of individual settlements, countryside and other open areas around the town and to maintain the functional separation that exists whilst allowing planned development to proceed in an appropriate manner. The Open Breaks at Farndon, Coddington and Winthorpe not only manage the relationship of significant planned new development they also provide protection against further development pressure which would result in the coalescence of those settlements and Newark. Turning to Farndon specifically; it is a rural village and, whilst closely associated with Newark, the village is not physically attached to Newark Urban Area. Farndon has a very different identity to Newark and consequently a different role within the spatial strategy with limited development reflecting the needs of its small community. The Open Break policy has allowed Farndon to continue to function as a village rather than as a suburb of Newark. The policy has been successful with the coalescence of the settlement prevented and the individuality, role and function of each settlement maintained. Large scale development at Newark South was carefully planned to maintain and enhance the role of the Farndon Open Break. The western boundary of the masterplan shows a planting belt with sports pitches, open space, etc to ensure the separation of the two settlements is maintained. The current application on land off Fosse Road, application reference 18/02362/FULM, clearly shows that there is development pressure within the Open Break. The application site represents an essential element of the Open Break without which the coalescence of the settlements occurs. The proposal as submitted, relies on a pretence that the</p>

		<p>Newark South development would immediately adjoin this part of the open break; resulting in no harm because the open break is already comprised. This misses, entirely, the place making considerations that went into the Newark South development which made provision for open space immediately adjacent to the open break in order to maintain its integrity and prevent harm to its form and function. As mentioned, this approach to planned development has recently been found to be sound and is capable of continuing to provide a robust and appropriate approach to guiding development and meeting the need for growth in the statutory development plan. The importance of the open breaks in principal, and the implementation of the existing policy wording in light of development pressure was tested recently in an appeal at Coddington (APP/B3030/C/18/3196972 – 3196978 (inclusive) and found to be compliant with the Framework and necessary to maintain the relationships described above, despite (in that instance) some benefits arising from the development proposed. Taking these matters together, it is our view that a review of the open break policy should find no change necessary to the approach in the existing statutory development plan.</p> <p>Response – Noted.</p>
4		<p>The current wording of Policy DM11 requires retail development proposals which create more than 2,500sqm of floorspace outside of town, district and local centre locations to be justified by sequential and impact tests. The policy wording should be amended to require a sequential test for main town centre uses rather than purely ‘retail’ in order for the policy to comply with the Framework. Furthermore, the current threshold is fairly high when compared to other adopted local plans. Any lowering of the floorspace figure will, of course, need to be informed by appropriate evidence. Given that it is a key objective of national and local policy to protect town centres, and with Newark showing signs of precarious health, a review of the threshold is welcomed. We note that roadside services are currently capable of being considered under Policy DM8. How this policy relates to Policy DM11 and its requirements for sequential assessment should be considered in order to restrict roadside service proposals in the countryside to only those which are genuine and have proven need taking into account existing services. Furthermore, the relationship between DM8 and the Open Break policies (i.e. NUA/OB/1) should also be clarified, in as much as that, proposals for roadside services should not normally be permitted in open breaks. The policy wording and cross referencing of policies in these regards should be considered carefully in order to prevent harm to the town centre first and open break policy objectives. We would be more than happy to discuss this letter and the implications it may have for policy wording if that is considered helpful. In the meantime, we would be grateful if our comments could be given due consideration through the review.</p> <p>Response –</p> <p>Noted. The intention is that the reference to the Sequential Test within DM11 will be amended to clarify that it refers to all Main Town Centre Uses. Core Policy 8 within the Amended Core Strategy has already introduced local impact thresholds well below 2,500 sqm, the review of DM11 will consider whether it would be appropriate for the same to be done for non-retail Main Town Centre Uses.</p> <p>It is considered that the inclusion of roadside services within Policy DM8 continues to be appropriate, given that in most cases it is the open countryside where such proposals will be located. Where this is not the case then other relevant policy content within the Development Plan</p>

			<p>provides an appropriate basis for determination. Where roadside proposals incorporate main town centres uses then it is considered that Core Policy 8 and Policy DM11 provide the basis for application of the Sequential Test – as shown as part of the determination of the roadside services proposal in the Farndon Open Break. It is therefore not considered necessary to make further amendment along the lines of that suggested.</p> <p>The wording of Open Breaks policy will form part of the review of the designations; it is however not viewed as necessary to move from the current approach towards development in general to list specific forms of development which will not be acceptable.</p>
28	Fisher German obo Richborough Estates	11	<p>The Southwell Neighbourhood Plan was made in October 2016 and as such was prepared to be in accordance with both the original Core Strategy and Allocations and Development Management DPD's. This plan sought to add a number of local policies to those contained within the Council's adopted Development Plan. As such, the Neighbourhood Plan simply matched the allocations contained within the Allocations DPD. Considering this, it is logical to assume that if the Council looked to alter allocations within Southwell as part of this plan review, any changes could simply be matched by a review of the Neighbourhood Plan which would logically follow. Regardless, due to primacy any changes to allocations would automatically overrule the allocations contained within the Neighbourhood Plan anyway.</p> <p>In addition to the above, the presence of a made Neighbourhood Plan should not constrain future development and should not prevent future allocations being made or identified as reserve allocations in sustainable locations through the Plan Review. It is recognised that the Amended Core Strategy was examined under transitional arrangements meaning the adopted housing requirement was based on an Objectively Assessed Housing Need (OAHN) rather than the Government's standard methodology for calculating Local Housing Needs. However, it should be noted that the Council's current adopted housing requirement figure is less than the Local Housing Need figure. It is therefore considered that the adopted housing requirement should be treated as a minimum and not a ceiling to development and that the Plan should allocate more land to ensure as large a contingency as possible is provided above the adopted housing requirement. In so doing smaller sites, in and around sustainable settlements such as Southwell have to be considered. Such an approach would not be contrary to the Southwell Neighbourhood Plan which sought to reflect the allocations already made in the adopted Allocations and Development Management DPD and prepared in the context of the Plan being reviewed.</p> <p>Response – Noted. The Council has made sufficient provision for development within Southwell to meet the housing requirement and so consequently no fresh allocations are being considered for inclusion as part of the Review. It is intended to insert text to make it clear that development proposals on allocated sites in Southwell will also be subject to the policies of the Neighbourhood Plan.</p>
		12	<p>Despite the loss of at least one allocation at the former Minster School, the Council consider that there remains sufficient land allocated, and committed to negate the need to establish any new allocations.</p> <p>Considering the remaining allocations, we have a number of concerns relating to So/Ho/5 - Land off Lower Kirklington Road. An application for 80 dwellings (amended from 105 dwellings) has recently been refused by Newark and Sherwood's Planning Committee, with four reasons for refusal. It is considered that some of the reasons for refusal may be surmountable, albeit with potentially fewer dwellings coming forward</p>

on site. There does however appear to be an impasse in delivering an acceptable access to the site. The applicants preferred solution was a 4-armed mini roundabout, stating that traffic lights were incongruous with the overriding character of Southwell. The Highways Authority however would not accept a 4-armed mini roundabout, requiring a traffic light arrangement to enter the site. This meant the applicant had to apply with traffic light junction, despite having outlined the inappropriateness of such an approach. Whilst this was the requirement of the Highways Authority this was not accepted by the Council's Planning Committee who agreed that the proposed traffic lights would harm the character of the settlement and as such forms one of the reasons for refusal. Paragraph 108 of the NPPF confirms that when considering whether a site should be allocated for development, it should be ensured that safe and suitable access to the site can be achieved for all users. Having regard for the severe doubts that must exist regarding the ability to successfully access the site, this allocation must now be regarded as undeliverable and should not be continued as an allocation, unless significant evidence can be provided outlining that an acceptable scheme is available on the site.

Whilst according to the Council's data this would not lead to a shortfall of housing delivery within Southwell against the Core Strategy target, the Council are reminded that it is incumbent upon them to seek to boost significantly the supply of housing. The targets contained in the Core Strategy are minimums, not maximums and given the low levels of growth directed towards Southwell there are likely to be significant positives through increasing delivery levels within the Service Centre settlement. The Council are also reminded that it is necessary to maintain housing delivery and a five-year supply of housing land and there must be a demonstrably robust land supply at the Examination or the Planning Inspector cannot find the Plan sound. As such, we consider there is significant merit in replacing any allocations lost to ensure a continued integrity of supply.

It is further noted that the original Core Strategy outlined that Southwell '*has a serious housing need which is perpetuated by high local house prices*'. Despite this, both the original Core Strategy and the amended has sought to restrict the levels of development directed to the settlement, on the basis that the settlement is constrained. We do not agree that the level of housing directed to Southwell is commensurate to either its sustainability or likely levels of housing need. The Amended Core Strategy directs only 3% of the housing requirement here (10% of the Service Centre growth). This will not sufficiently improve affordability within the settlement and the reality is that without sufficient growth affordability is likely to worsen. Clearly the availability of sites which have been previously assessed as acceptable indicate that there is little justification in restricting further growth here. Southwell is a highly sustainable settlement, the third largest in the District and benefiting from the best retail offer outside of Newark. As such it is considered growth can be brought well above the 264 dwellings established in the Core Strategy. Such housing targets contained within the Core Strategy are minimums and not maximums, and it is entirely reasonable and consistent with national policy to seek to deliver levels of growth in excess of minimum targets. This is particularly pertinent in areas such as Southwell, which have well documented affordability and house-type composition issues.

One of the key themes within the Southwell Neighbourhood Plan is the delivery of bungalows within Southwell. This is reflective of the composition of the population of Southwell, which contains a high proportion of older people. To this end the Neighbourhood Plan was

submitted and successfully examined containing a policy requirement for 20% of new housing on allocated sites to be bungalows. This leads to a notional requirement of in the region of 60 bungalows to be delivered within the settlement. However, despite this, only 19 have been approved to date, and it is not clear if all of these have or will be delivered. It is noted that the recently rejected application at allocation So/Ho/5 contained no provision for bungalows and again this forms a reason for refusal. Considering this, the Council should seek to positively increase the delivery of bungalows within the settlement where possible.

Having regard for affordable housing, it is noted that no affordable houses were delivered by the private sector in Southwell in the past two years and only 10 have been delivered in the previous four years. This equates to only 2.5 affordable units per year. In this period however 104 dwellings were completed. This equates to only 2.4% of all new properties being affordable. This further highlights the need for larger schemes to be advanced, which will provide affordable housing, rather than placing significant reliance on windfall sites. Without this, there will likely be significant issues related to affordable housing demand and the ability of the Council to cater for this need.

Within the Allocation & Development Management Issues Paper, the Council outline their proposed approach for each settlement designated in the Amended Core Strategy as either a Sub-Regional Centre, Service Centre or a Principal Village. For Southwell, the Council indicate at paragraph 9.21 that there are sufficient dwellings provided for through both completions and commitments (sites benefiting from planning permission) to deliver the 264 dwelling targets established within the Core Strategy, with two dwellings to spare. Some of these commitments are also allocations from the original Allocations & Development Management DPD, but also from a large number of small windfall sites.

It is also noted that this total assumes the delivery of all committed sites and does not apply any lapse rate. Lapse rates are often in excess of 20% and as a result delivery could be significantly below that committed. Moreover, and to demonstrate this point, the Council within their calculations rely on an approved outline permission for 12 dwellings at Lower Kirklington Road (15/00475/OUTM). This outline application was granted on the 27th October 2016. The first condition outlined that a reserved matters application must be submitted within 3 years. To date there has been no submission of a reserved matters application, with just two months left before the permission lapses. It is also noted that a new planning agent is advancing a scheme for 80 dwellings on the wider allocated site and as such it does not seem likely at present that the 12-dwelling approved scheme will be carried forward. Furthermore, access for this 12 dwelling scheme is yet to be established and having regard for the 80-dwelling scheme, it is not clear whether an acceptable access can be established as discussed above. Having regard for the above, there is some doubt as to whether the total assumed at paragraph 9.21 can be relied upon therefore.

Considering these points we consider there to be compelling justification to allocate additional land within Southwell on land to the west of Allenby Road. Details of the site and indicative illustrations are put forward.

			<p>Response – The Council has made sufficient provision for development within Southwell to meet the housing requirement and so consequently no fresh allocations are being considered for inclusion as part of the Review. The agents of So/Ho/5 confirm that the land is still suitable and achievable, noting that the figure of around 60 dwellings is not a ceiling. The permission for 12 dwellings is likely to lapse later this year. However, the figure included for the allocation was reduced by 12 to ensure there was no double counting. Should the application lapse the allocation allowance will revert to 60 dwellings leaving no net deficit.</p>
29	IBA Planning Ltd	1	<p>Yes</p> <p>Response – Noted</p>
		2	<p>Yes. However, unsure why entry level exception sites should not be supported in the GB given paragraph 145(f) of the 2019 NPPF includes "limited affordable housing for local community needs under policies set out in the Development Plan (including policies for rural exception sites)".</p> <p>Response – The NPPF is clear at footnote 34 that they are not appropriate in Green Belt locations.</p>
		5	<p>Yes. As confirmed in the consultation document, many of the current Open Break designations have simply been carried forward from those set many years ago. Clearly, regard should be had to their overall function as part of any review, but the Council should consider more specifically whether there are any sites or areas which contribute little, or are less important, to the overall objectives of the policy. The retention of Open Break designations is however still supported. As a policy that has a wider/strategic role, land falling within the Open Breaks (post review) will be afforded additional protection over say less strategically important countryside in circumstances where the Council might not be able to demonstrate a 5 year housing land supply and the presumption in favour of sustainable development is triggered.</p> <p>Response – Noted.</p>
		12	<p>The Council's summary in paragraph 9.62 that (despite the proposed de-allocation of Bl/Ho/4) "Sufficient provision has therefore already been made to meet the housing requirements of Blidworth and that flexibility exists if the delivery of sites does not occur at anticipated rates" is clearly predicated on Allocation Bl/Ho/3 coming forward and delivering its maximum quota of 100 dwellings.</p> <p>However, the Council will surely acknowledge there remains significant doubt over the actual delivery and capacity of this site (as there were at the time of its original allocation) owing to, among others, a substandard junction which appears to fall beyond the control of the site owners, those promoting the site and the local Highway Authority to be able to satisfactorily resolve.</p> <p>In reality, the Council has no idea at present how many houses the site can yield, or indeed whether it can be delivered at all. If it does (in terms of a minimum number), then it should be the known minimum number that should be included within the policy wording and justification, rather than the maximum.</p>

Clarity is also sought as to why the owners of site Bl/Ho/4 now suggest this site is no longer available for development - as this runs completely counter to the representations made at the time of the previous Allocations and Development Management DPD Examination when the Inspector was persuaded the site was available for development and allocated it for housing at the expense of others.

The current Allocations and Development Management DPD requires the securing of alternative allotment provision before the development of site Bl/Ho/4 can occur.

If the reason the owners consider the site is "no longer available" is due to the perceived absence of, or difficulty in procuring, alternative allotment provision, then my clients wish the Council to be aware they have a site on the edge of the village which they are prepared to release (as part of either a land swap or joint venture arrangement) for replacement allotments to assist in securing the delivery of Bl/Ho/4 - one of the few remaining sites left for development within the existing built-up area.

Whilst my clients' site lies within the Green Belt, allotments are of course one of the few categories of development considered appropriate within such a designation.

In the light of this information, the reasoning behind the current owners' consideration of Bl/Ho/4 should be further explored - as the retention of this housing allocation provides the key to ensuring there is sufficient flexibility in the DPD following review if the delivery of (other) sites does not come forward at the anticipated rate.

The need for flexibility is all the more important in Blidworth where current allocations significantly fell short of the original Core Strategy requirements and where the settlement is tightly constrained by the Green Belt, with limited opportunities available within the built-up area to come forward as windfall sites to provide alternative flexibility.

The de-allocation of site Bl/Ho/4 further erodes certainty of housing numbers for the village across the Plan period and consequently seriously diminishes flexibility.

Finally, in fairness to all those landowners who patiently promoted their land through the original Core Strategy and Allocations and Development Management DPD consultation stages and EIPs (including the Green Belt Review) but were ultimately denied consideration as a consequence of the Inspector concluding there were sufficient sites within the built-up area (including particularly site Bl/Ho/4) without the need to release further land from the Green Belt, the Council is urged not to de-allocate site Bl/Ho/4 too readily and to further explore the options of alternative allotment provision as required to facilitate the delivery and more effective use of the land at Bl/Ho/4 for housing.

			<p>In the above connection, the original Core Strategy requirements necessarily incorporated a significant proportion of affordable housing to meet identified local housing needs. The re-allocation of sites elsewhere to non-Green Belt locations clearly did nothing to fulfil those local housing needs of Blidworth.</p> <p>The uncertainties of the delivery (and yield) for site BI/Ho/3 and the de-allocation of BI/Ho/4 together further diminish the opportunity for meeting those local housing needs in a viable and sustainable manner.</p> <p>Response – Work on a design based exercise to establish an appropriate site capacity for site BI/Ho/3 has been undertaken. The new capacity of the site is up to 80 dwellings. Blidworth Parish Council as owners of the allotment site (BI/Ho/4) have confirmed that they wish the site to be withdrawn. The Council has made sufficient provision for development within Blidworth to meet the housing requirement and so consequently no fresh allocations are being considered for inclusion as part of the Review.</p>
30	Johnson Mowat obo Avant Homes	1	<p>Whilst the table in Section 2 which outlines comments on compliance of Development Management Policies is useful, there is a lack of information regarding any proposed changes to Policies. The comments relate to the account to be taken of new national policy and guidance on viability assessment and developer contributions in a number of policy instances. This reference is welcome however account should also be taken to the cumulative impact of policy requirements on the viability and ultimately the deliverability of sites. An updated viability assessment would be advisable to sit alongside the Allocations and Development Management Plan Review.</p> <p>Response – Noted.</p>
		2	<p>Avant Homes agree that the Council should update its Affordable Housing policy to align with the latest NPPF policy requirements relating to threshold, at least 10% of new dwellings to be available for affordable home ownership, and support for entry level exception sites.</p> <p>Response – Noted.</p>
		9	<p>Avant Homes reserve the right to make further comments following the production of an audit of the Districts' open space and the production of updated open space standards. In relation to Local Green Space (LGS) and the Council proposing to leave the discretionary LGS designation process to Parish Council's as part of Neighbourhood Plan production, it is important that any LGS designation is robustly justified, and not used as a tool to prevent future development. It is equally important that the development industry and relevant landowners are informed of any proposed LGS designations during all stages of the Neighbourhood Plan process.</p> <p>Response – Noted.</p>
		10	<p>Building for Life 12 is not a mandatory requirement, it is a good design guide. It should not therefore become a policy requirement within Policy DM5. The justifying text to Policy DM5 could make reference to Building for Life 12 as a good design guide.</p> <p>Responses – Noted. The Council is considering whether to introduce a more standardised way of discussing layout and design with applicants the benefits of which we believe are clear for both parties. However the comments are noted and will considered as the policy developed.</p>
		14	<p>Additional comments relate to Section 9 of the Issues Paper – Housing and Employment Allocations.</p> <p>It is disappointing that the Issues Paper informs that there is no intention to identify any other new allocations.</p>

The Core Strategy Review, adopted in March 2019, includes a housing requirement based on an Objectively Assessed Housing Need as opposed to the Government's Standard Methodology due to the Review being examined under the transitional arrangements. The Core Strategy requirement is 9,080 dwellings between 2013 and 2033 (this equates to 454 dwellings per annum).

The Standard Method Local Housing Need number for Newark and Sherwood recalculated on the basis of the latest affordability ratios is **496** dwellings per annum (see explanation of calculation below):

Step 1: Using the 2014-based household projections from the current year over a ten year period (2019 – 2029) indicates an increase of 401 dwellings per annum.

Step 2: This is adjusted using the most recent median workplace-based affordability ratio (table 5c), published in March 2019. This is currently 7.80. The following calculation is then applied.

$$\text{Adjustment factor} = ((7.80 - 4)/4) \times 0.25 = 0.2375$$

Annual Local Housing Need figure = $(1 + 0.2375 \times 401) = 496$ dwellings per annum.

Step 3: The capped figure ($401 \times 1.4 = 561$) is greater than the annual local housing need figure so a cap does not apply.

In any event, the Core Strategy housing requirement is a minimum target and the provision of flexibility and contingency of sites allows for greater choice and competition in the market. We would therefore welcome more choice of sites in the Local Plan Review and would suggest that additional sites are identified.

The Framework requires regular reviews of Local Plans at least every 5 years. The Standard Method Local Housing Need figure is higher than the Core Strategy Review requirement (which is based on the former OAHN approach). It is likely that the Core Strategy minimum requirement will be increased in future reviews, therefore diminishing the Council's existing flexibility if existing allocated sites do not deliver as anticipated. In light of the likely increase to the housing requirement in future reviews it is considered wholly appropriate to identify additional allocations in the Allocations and Development Management Local Plan Review. There can be no harm that flows from this approach.

			<p>Furthermore, the success of the Core Strategy is reliant on 3 large sustainable urban extensions (South of Newark – circa 3,150 dwellings; East of Newark – circa 1,000 dwellings; and land around Fernwood - circa 3,200 dwellings). The reliance on these 3 large strategic sites is further reason to provide greater flexibility and choice of allocations, in order to spread the risk, should the strategic sites not deliver at the rates envisaged.</p> <p>In light of the above, we strongly recommend the Council introduces a layer of sites that can act as a fall back, if needs be, safeguarded for release in the event of poor or slow SUE delivery. The buffer in these sites should provide for 15% of the plan requirement.</p> <p>The site at Boughton is a sustainable edge of settlement site, close to existing facilities, and suitable for allocation, which will contribute to the regeneration focus of this Service Centre in accordance with the Core Strategy spatial growth strategy. There is no reason why additional flexibility of sites cannot be identified at this stage of the Plan Review.</p> <p>Response – The Council has made sufficient provision for development within the District to meet the housing requirement along with additional flexibility in the form of opportunity site and so consequently no fresh allocations are being considered for inclusion as part of the Review.</p>
31	Boyer Planning	1	<p>We agree with the Council's assessment that the Affordable Housing policy, as contained in Core Strategy (March 2019) Core Policy 1, should be updated in order to comply with the NPPF 2019 and our reasoning for this agreement can be seen in our answer to Question 2 below.</p> <p>Response - Noted</p>
		2	<p>We wholly agree that the Council should update Core Strategy (March 2019) Core Policy 1 'Affordable Housing Provision', which seeks to 'secure 30% of new housing development on qualifying sites as Affordable Housing', to reflect the latest government policy as set out in the NPPF, with particular reference to Paragraph 64 of the NPPF.</p> <p>As is stated in Paragraph 64, 'where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the homes to be available for affordable home ownership, unless this would exceed the level of affordable housing required in the area, or significantly prejudice the ability to meet the identified affordable housing needs of specific groups.'</p> <p>The current Affordable Housing policy (Core Strategy Core Policy 1) seeks a 30% provision on all new qualifying housing sites districtwide, which does not account for variation in socio-economic factors which would have an impact on the nature of market and affordable housing need across the district.</p>

		<p>Through lowering the affordable housing requirements for the District in line with the latest national government policy development opportunities which previously would have been rendered unviable would be enabled, thereby serving to support the Government's objective of significantly boosting the supply of housing in accordance with Paragraph 59 of the NPPF.</p> <p>Further to this, the exemptions to the 10% requirement as is outlined in Paragraph 64 of the NPPF should be incorporated into the Affordable Housing policy for the District, with the exemptions being that the site:</p> <p>"a) provides solely for Built to Rent homes; b) provides specialist accommodation for a group of people with specific needs (such as purpose-built accommodation for the elderly or students); c) is purposed to be developed by people who wish to build or commission their own homes; or d) is exclusively for affordable housing, an entry-level exception site or a rural exception site."</p> <p>Reply – National government planning does not lower affordable housing requirements, it merely specifies the minimum percentage of affordable home ownership products which should be provided on sites of 10 or more dwellings (i.e.10%). The Council will continue to set a policy compliant local target.</p>
	12	<p>Land around Fernwood, referred to in the Policy NAP 2C in the adopted Core Strategy, is allocated as a strategic site for housing (in the region of 3,200 dwellings along with employment development and other features.</p> <p>In the short term, the Council have included 130 dwellings from this allocation in their most recent five-year housing land supply (2018-2023). The Council refer to two resoultions to grant outline planning permission, with 180 units for Persimmon Homes (16/00506/OUTM) and 350 dwellings for Larkfleet Homes (17/01266/OUTM).</p> <p>Since the publication of the Council's Five Year Housing Land Supply document in September 2018 there has been no further progress made towards reserved matters applications for either parcel. As such, this demonstrates that the allocation is not coming forward in a timely manner such that 130 dwellings should be discounted from the current housing land supply and, critically, further provision of sites elsewhere in the District should be made to protect the housing land supply from being negatively impacted.</p> <p>The Council have included 490 dwellings from the Site Allocations and Development Management DPD (2013) in the latest Housing Trajectory, justifying their inclusion based upon evidence submitted to the Local Plan Inspector as part of the Local Plan Examination.</p> <p>However, since the publication of the latest Five Year Housing Land Supply (September 2018) the NPPF and NPPG guidance have been updated and which now requires Councils to provide up-to-date, site specific evidence of the deliverability of these sites over the next 5</p>

years. Per the requirements of the updated guidance, in order to demonstrate the deliverability of sites without full planning permission, site specific evidence should be obtained directly from the landowners or developers that control the sites which have been included within the supply.

Land north of Lowfield Lane has been allocated in the Site Allocations and Development Management DPD (2013) under reference NUA/Ho/10 for around 120 dwellings and is under the Council's landownership. To date no progress has been made towards the submission of an application for this site, and it is not apparent what level of developer interest there is in purchasing the site and taking it forward for development. In the absence of an outline or full planning application, an apparent on-board developer, or any site specific evidence to demonstrate deliverability there is no certainty that land north of Lowfield Lane will come forward in the next five years and should therefore be removed from the five-year housing land supply.

Similarly, land at Bowbridge Road, allocated for mixed-use development including around 115 dwellings and a new leisure centre under reference NUA/MU/4 in the Allocations and Development Management DPD (2013) and which is Council owned, has at the time of writing not been the subject of an outline nor full planning application and there is also no indication of the level of developer interest in taking on the site. In the absence of an outline or full planning application, an apparent on-board developer, or any site specific evidence to demonstrate deliverability there is no certainty that land at Bowbridge Road will come forward in the next five years and should therefore be removed from the five-year housing land supply.

There is one allocation in Clipstone, referred to as Cl/MU/1 in the Allocations and Development Management DPD (2013) for 120 dwellings on land at former Clipstone Colliery. We query the deliverability of the site due to likely intensive remediation works which will be required to enable the residential development of the site, given the land's former use as a colliery, and the colliery's headstocks remain in situ. In the event that the Clipstone Colliery site fails to come forward the housing needs of Clipstone will fail to be addressed over the plan period, which is in opposition to the objective of the Government to significantly boost the supply of homes.

In response to this, and in response to other allocated sites which may not come forward as expected elsewhere in the District, we propose the allocation of land off Clipstone Drive, Clipstone (please see the accompanying Location Plan) which could be developed for residential purposes delivering in the order of approximately 800 dwellings. Land off Clipstone Drive, Clipstone benefits from being sited in a highly sustainable location bearing direct reference to the settlement as well as the recently developed parcel of land to the north-east. The site forms a natural boundary to Clipstone, serving to tie the Taylor Wimpey development to the north-east in with the schools and other uses to the south-west, thereby offering a betterment to Clipstone.

The site benefits from having access to the south-west from Clipstone Drive with the possibility of pedestrian accessibility into the parcel of land to the north-east where Persimmon Homes obtained full planning permission for 107no. dwellings (app. ref: 17/00582/FULM).

Further to this, the site also benefits from being located entirely within Flood Zone 1 and does not contain any trees or groupings of trees which are protected by Tree Preservation Orders. There are also no listed buildings nor scheduled ancient monuments on or within close proximity to the site.

The proposed allocation as contained herein is being promoted with firm developer interest, thereby demonstrating its deliverability, and our client is highly motivated to submit a planning application in regards to the residential development of the site subsequent to the site's allocation.

The allocation of the site will act to reinforce the five-year housing land supply of the District in the short to medium term, and the developer/s would be able to get on-site promptly due to the relative lack of pre-development preparatory works or infrastructure which is required.

The proposed allocation, which is being submitted simultaneously through the SHLAA process, would make a considerable and material contribution towards not only meeting the housing requirements of the District but also due to proximity it would have a positive impact on the housing requirements for Mansfield District, with the site being located approximately 5km to the north-east of Mansfield town centre and Clipstone being referred to as a settlement in the 'Mansfield Fringe Area' in the Allocations and Development Management DPD (2013). Therefore, the allocation of land off Clipstone Drive, Clipstone is accordant with the general thrust of the NPPF and in particular the duty for local planning authorities to co-operate with each other in order to address strategic matters, as is stated in Paragraph 24 of the NPPF.

In conclusion, there are no material reasons why land off Clipstone Drive, Clipstone could not be allocated and then developed for residential purposes. Indeed, there are uncertainties over the delivery of some of the allocations which have already been made, which are referenced above. As such, further allocations will need to be made to ensure that the housing land needs of the District are met, being mindful of the Government's aspiration to deliver 300,000 dwellings a year.

Response – The Council has made sufficient provision for development within the District to meet the housing requirement along with additional flexibility in the form of opportunity site and so consequently no fresh allocations are being considered for

			inclusion as part of the Review. Using the amended definition of deliverable, the District council is confident that it has a deliverable five year land supply.
		14	<p>We also wish to raise comment regarding the Community Infrastructure Levy (CIL) Charging Schedule which has been adopted by the Council in 2018 wherein a Districtwide rate of £100sqm has been imposed upon retail uses across use class A1-A5.</p> <p>This element of the CIL Charging Schedule has an acutely harmful impact upon the viability of implementing retail schemes across use classes A1-A5 within the District and should be removed.</p> <p>The CIL Charging Schedule fails to recognise the current economic climate in the traditional retail sector, which is well recognised as being in severe decline, with particular reference to high street retail. Enforcing a £100sqm CIL charge upon retail uses across use classes A1-A5 is highly counterproductive and serves to inhibit critically needed retail investment across the District.</p> <p>Response – The Council carried out a comprehensive viability assessment to support the review of the CIL including the setting of a retail rate.</p>
32	IBA Planning obo Forest Homes Ltd	12	<p>The Council's summary in paragraph 9.62 that (despite the proposed de-allocation of Bl/Ho/4) "Sufficient provision has therefore already been made to meet the housing requirements of Blidworth and that flexibility exists if the delivery of sites does not occur at anticipated rates" is clearly predicated on Allocation Bl/Ho/3 coming forward and delivering its maximum quota of 100 dwellings.</p> <p>However, the Council will surely acknowledge there remains significant doubt over the actual delivery and capacity of this site (as there were at the time of its original allocation) owing to, among others, a substandard junction which appears to fall beyond the control of the site owners, those promoting the site and the local Highway Authority to be able to satisfactorily resolve.</p> <p>In reality, the Council has no idea at present how many houses the site can yield, or indeed whether it can be delivered at all. If it does (in terms of a minimum number), then it should be the known minimum number that should be included within the policy wording and justification, rather than the maximum.</p> <p>Clarity is also sought as to why the owners of site Bl/Ho/4 now suggest this site is no longer available for development - as this runs completely counter to the representations made at the time of the previous Allocations and Development Management DPD Examination when the Inspector was persuaded the site was available for development and allocated it for housing at the expense of others.</p>

The current Allocations and Development Management DPD requires the securing of alternative allotment provision before the development of site Bl/Ho/4 can occur.

If the reason the owners consider the site is "no longer available" is due to the perceived absence of, or difficulty in procuring, alternative allotment provision, then my clients wish the Council to be aware they have a site on the edge of the village which they are prepared to release (as part of either a land swap or joint venture arrangement) for replacement allotments to assist in securing the delivery of Bl/Ho/4 - one of the few remaining sites left for development within the existing built-up area.

Whilst my client's site lies within the Green Belt, allotments are of course one of the few categories of development considered appropriate within such a designation.

In the light of this information, the reasoning behind the current owners' consideration of Bl/Ho/4 should be further explored - as the retention of this housing allocation provides the key to ensuring there is sufficient flexibility in the DPD following review if the delivery of (other) sites does not come forward at the anticipated rate.

The need for flexibility is all the more important in Blidworth where current allocations significantly fell short of the original Core Strategy requirements and where the settlement is tightly constrained by the Green Belt, with limited opportunities available within the built-up area to come forward as windfall sites to provide alternative flexibility.

The de-allocation of site Bl/Ho/4 further erodes certainty of housing numbers for the village across the Plan period and consequently seriously diminishes flexibility.

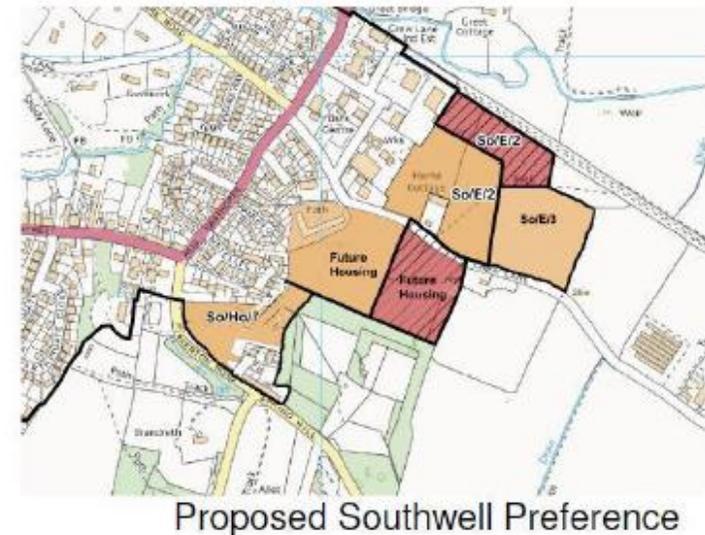
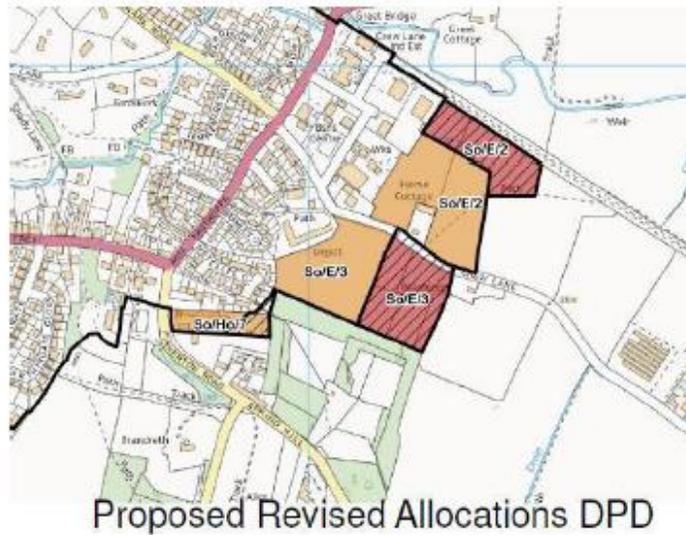
Finally, in fairness to all those landowners who patiently promoted their land through the original Core Strategy and Allocations and Development Management DPD consultation stages and EIPs (including the Green Belt Review) but were ultimately denied consideration as a consequence of the Inspector concluding there were sufficient sites within the built-up area (including particularly site Bl/Ho/4) without the need to release further land from the Green Belt, the Council is urged not to de-allocate site Bl/Ho/4 too readily and to further explore the options of alternative allotment provision as required to facilitate the delivery and more effective use of the land at Bl/Ho/4 for housing.

In the above connection, the original Core Strategy requirements necessarily incorporated a significant proportion of affordable housing to meet identified local housing needs. The re-allocation of sites elsewhere to non-Green Belt locations clearly did nothing to fulfil those local housing needs of Blidworth.

			<p>The uncertainties of the delivery (and yield) for site Bl/Ho/3 and the de-allocation of Bl/Ho/4 together further diminish the opportunity for meeting those local housing needs in a viable and sustainable manner.</p> <p>Response – Work on a design based exercise to establish an appropriate site capacity for site Bl/Ho/3 has been undertaken. The new capacity of the site is up to 80 dwellings. Blidworth Parish Council as owner of the allotment site (Bl/Ho/4) has confirmed that they wish the site to be withdrawn. The Council has made sufficient provision for development within Blidworth to meet the housing requirement and so consequently no fresh allocations are being considered for inclusion as part of the Review.</p>
33	Tetlow King Planning obo David Sparks, Minster Veterinary Centre	2	<p>The Council should ensure that the definition of affordable housing within the Plan matches the range of affordable housing products now detailed at Annex 2 to the February 2019 National Planning Policy Framework (NPPF). This will ensure that local policy also provides support for the broad range of products now detailed in national policy.</p> <p>For the avoidance of doubt, the NPPF now defines affordable housing as follows and the Council's Affordable Housing Policy should follow suit:</p> <p>A) Affordable housing for rent - meets all of the following conditions: (a) the rent is set in accordance with the Government's rent policy for Social Rent or Affordable Rent, or is at least 20% below local market rents (including service charges where applicable); (b) the landlord is a registered provider, except where it is included as part of a Build to Rent scheme (in which case the landlord need not be a registered provider); and (c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision. For Build to Rent schemes affordable housing for rent is expected to be the normal form of affordable housing provision (and, in this context, is known as Affordable Private Rent).</p> <p>B) Starter Homes - as specified in Sections 2 and 3 of the Housing and Planning Act 2016 and any secondary legislation made under these sections. The definition of a starter home should reflect the meaning set out in statute and any such secondary legislation at the time of plan-preparation or decision-making. Where secondary legislation has the effect of limiting a household's eligibility to purchase a starter home to those with a particular maximum level of household income, those restrictions should be used.</p> <p>C) Discounted market sales housing - is that sold at a discount of at least 20% below local market value. Eligibility is determined with regard to local incomes and local house prices. Provisions should be in place to ensure housing remains at a discount for future eligible households.</p> <p>D) Other affordable routes to home ownership - is housing provided for sale that provides a route to ownership for those who could not achieve home ownership through the market. It includes shared ownership, relevant equity loans, other low cost homes for sale (at a price equivalent to at least 20% below local market value) and rent to buy (which includes a period of intermediate rent). Where public grant funding is provided, there should be provisions for the homes to remain at an affordable price for future eligible</p>

			<p>households, or for any receipts to be recycled for alternative affordable housing provision, or refunded to Government or the relevant authority specified in the funding agreement.</p> <p>Response – Noted</p>
		11	<p>Among the consultation documentation is the Consultation Responses Document (July 2017) which provides a summary of representations received to the February 2017 Preferred Approach consultation and the District Council’s response to these and any actions that will result from this.</p> <p>At paragraph 2.36 of the Consultation Responses Document, the District Council’s response is set out as follows:</p> <p><i>“Following the County Council’s deletion of the Southwell Bypass there is no longer any need to maintain its previously safeguarded line. In this event Policy So/E/1 commits the authority to taking the opportunity to review the Crew Lane Industrial Estate Policy Area. As part of this the Town Council’s proposals concerning So/E/3 and So/Ho/7 will be assessed and its merits considered moving towards the Publication Amended Allocations & Development Management DPD. It should be noted that the proposal would largely involve the amendment of existing allocations”.</i></p> <p>The Consultation Responses Document outlines the District Council’s clear action to:</p> <p><i>“Assess the Town Council’s proposal concerning So/E/3 and So/Ho/7 and consider its implications moving towards the Publication Amended Allocations & Development Management DPD.”</i></p> <p>For clarity, the representation made by the Town Council to the February 2017 consultation is replicated below in figure 1.</p>

Figure 1: Southwell Town Council Representations to February 2017 Preferred Options Approach Consultation

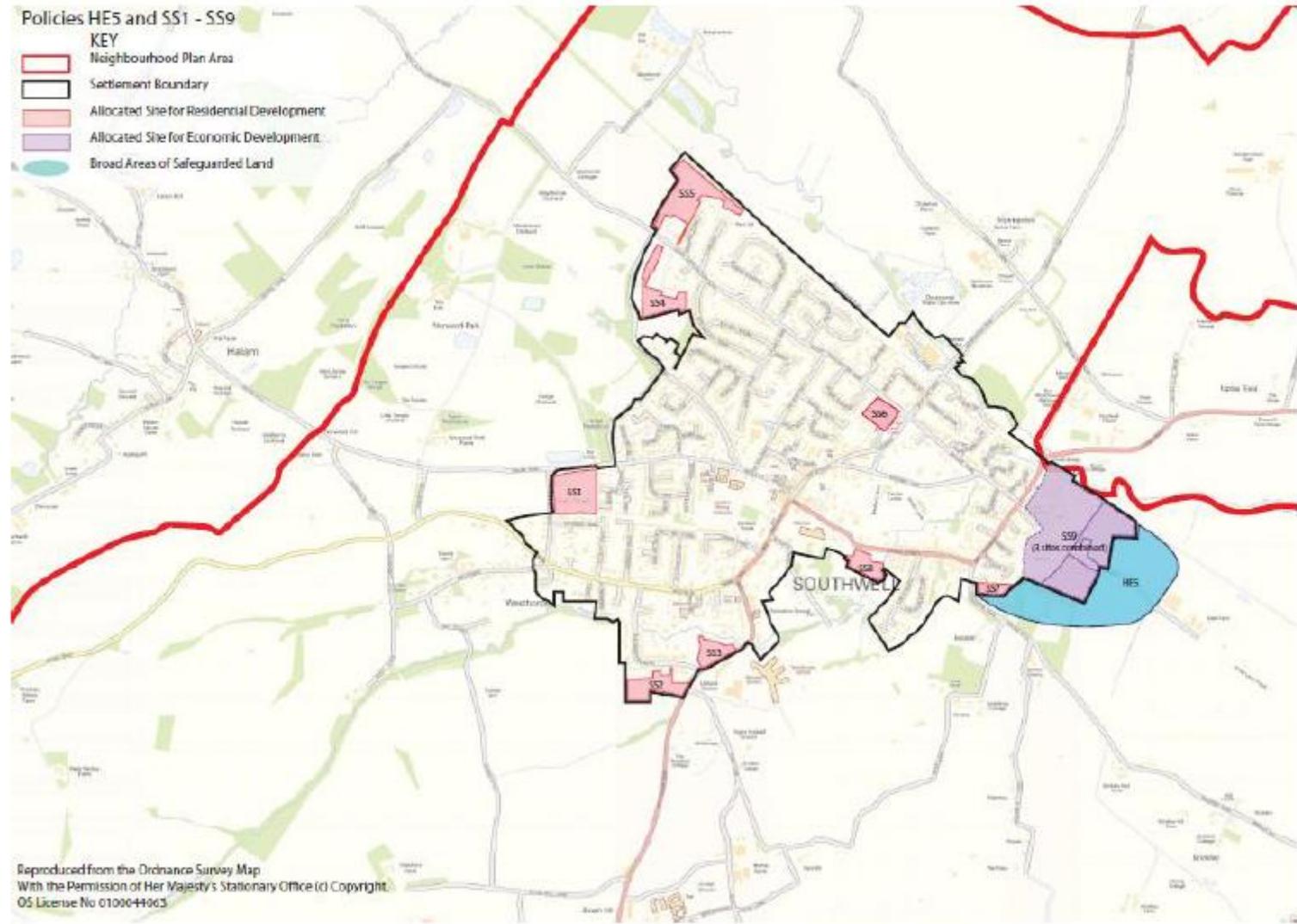


At paragraph 2.38 of the Consultation Responses Document reference is drawn to my client's proposed site which was put forward through the consultation process, and notes that my client's site adjoins the area proposed by the Town Council.

The District Council's response states that the District Council has made sufficient provision for development within Southwell so no fresh allocations are being considered. This is contrary to the District Council's response at paragraph 2.36 where it commits to assessing the merits of the Town Council's proposals, part of which extend onto my clients land to the north of Crew Lane. The District Council's approach is to have pre-determined the outcome before it has even assessed the proposals.

It is also a matter of consideration that my clients land was included within a broad area of safeguarded land under proposed Policy HE5 in the Consultation Draft Southwell Neighbourhood Plan, which is replicated in figure 2 below.

Figure 2: Consultation Draft Southwell Neighbourhood Plan Proposed Allocations



At the time the proposed Policy HE5 (which my clients land fell within) was said to address Objective 1 and Objective 6 of the Consultation Draft Neighbourhood Plan, which for the avoidance of doubt were:

- *“Objective 1: Sustainable Development – to ensure that proposals for new development are presented within the wider social, economic and environmental context and informed decision about future growth can be made”*; and
- *“Objective 6: Housing and Employment – to support residential and commercial development within the town, through meeting the strategic requirements for growth whilst maximising the benefits for the community.”*

The proposed Policy HE5 at the time of the Consultation Draft Neighbourhood Plan is replicated below at figure 3.

Figure 3: Consultation Draft Southwell Neighbourhood Plan Policy HE5
POLICY HE5 - SAFEGUARDED LAND FOR THE FUTURE

Introduction

10.17. The Allocations and Development Management DPD at the District level sets a number of sites for employment and residential development to meet identified local need. Should any of the current DPD allocations prove undeliverable for any reason apart from viability, then the following policy indicates the circumstances and location where other development may be suitable as a replacement. If the present DPD is found to be delivering development successfully then the safeguarded land may be held over for consideration in the next plan period.

10.18. The land associated with the Southwell Bypass and allocated employment site So/E/3 are also possible locations for other development. There are only certain portions of these sites and circumstances whereby these may be considered as alternative residential development sites. The policy below sets out these circumstances.

Policy

The Neighbourhood Plan identifies sites to the east of Southwell adjacent to the Crew Lane allocated sites as a broad location as suitable for development in the next plan period (as shown on the plan at Appendix 6), or in place of an allocated site where it can be demonstrated that there is not a realistic chance of the site being delivered in the plan period.

Sites that are brought forward within these broad locations must demonstrate compliance with the following criteria:

- *Consideration and minimisation of landscape impact, with particular concern for the landscape setting of Southwell.*
- *Protection of key views as defined by Policy So/VP of the NSDC A&DM DPD*

Any release of the above land will require formal consideration and amendment to the Urban Boundary set out in the A&DM DPD.

It is entirely unclear why the proposed Policy HE5 was removed by the time of the Submission Version Neighbourhood Plan. The Town Council had already found this to be an acceptable location for residential development in the earlier iterations of the Plan, even going so far as to state that it would represent a location that would meet the objective of sustainable development and the objective for strategic growth.

There is no publicly available information showing any objections from any local residents or statutory consultees to the proposed policy nor any technical studies identifying any reasons as to why the land in question would not be suitable for residential development.

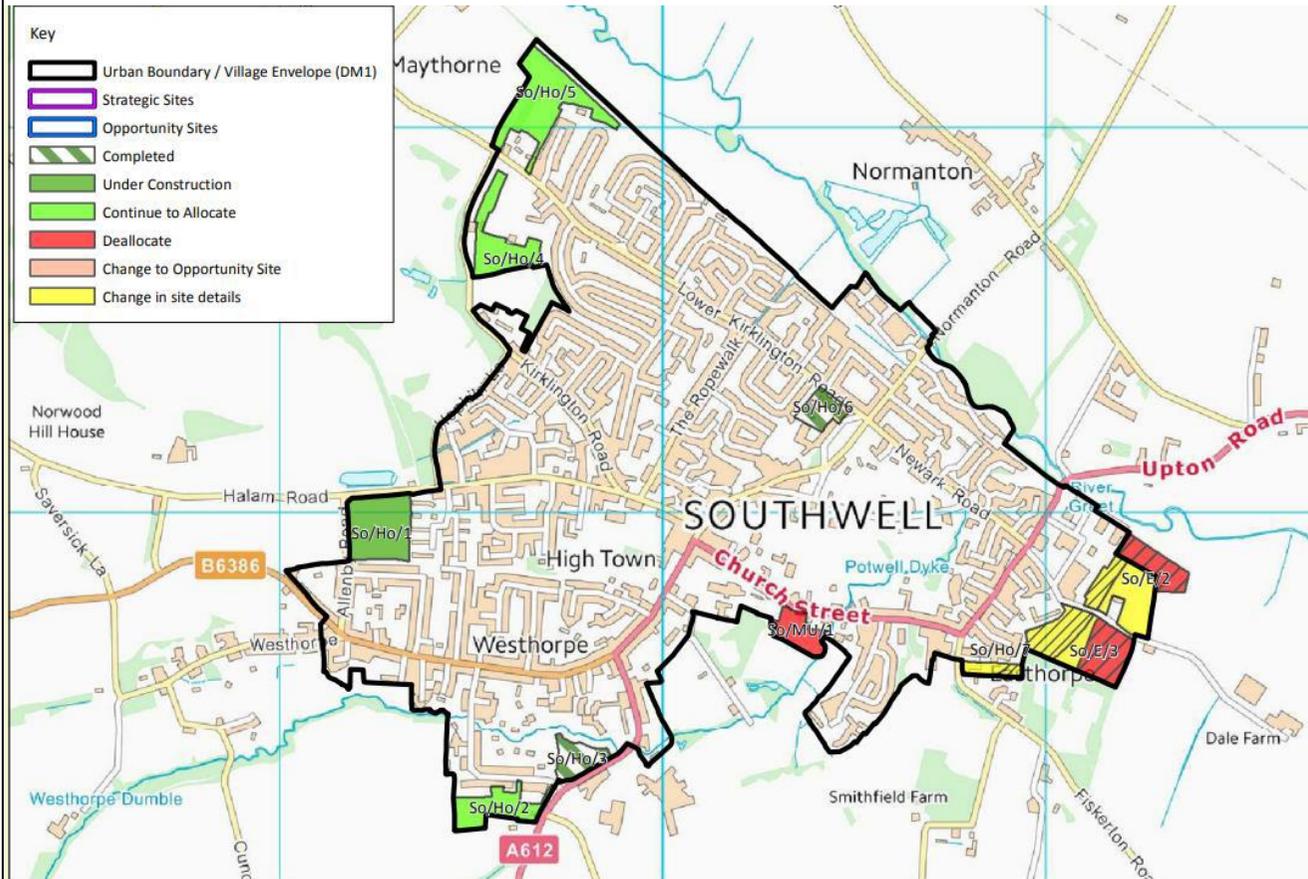
The removal of the 'Broad Areas of Safeguarded Land' for development from the Plan is made even more peculiar by the fact that the Town Council have continued to publicly promote their preference for residential development to the east of Southwell through their representations to the Allocations and Development Management Plan Review process.

What is abundantly clear is that Town Council have long considered, and continue to consider, that the most appropriate and sustainable location for the future growth of Southwell is to the south east of the Town on land either side of Crew Lane.

It is understood that the Town Council have not been invited to engage further with the District Council to discuss their preferred allocation proposals for the Town, despite the District Council's public commitment to assess the merits of these proposals.

Despite the Town Council's clear preference for residential development to extend southeast from Southwell to the south side of Crew Lane, the District Council's current consultation proposals indicate that the District Council intends to deallocate land south of Crew Lane as shown at figure 4 below.

Figure 4: Allocations and Development Management Issues Paper Proposed Amendments to Southwell



The emerging Allocations and Development Management Plan references the Town Council's alternative approach put forward to the future development of the south east of the Town at paragraph 9.15 and acknowledges that the Southwell Neighbourhood Plan requires a review of the Crew Lane Industrial Area given there is no longer a requirement for the By-pass.

Once again reference is drawn to my client's land being adjacent to the land proposed by the Town Council for residential development at paragraph 9.20.

Paragraph 9.21 goes on to state that the housing requirement in Southwell is 264 dwellings and when dwellings built since 2013 and site with permission are considered then *"two dwellings above the minimum requirements have been provided"*. It is important that the District Council acknowledge that the requirement for Southwell is a minimum.

There are a further 14 years left to run until the end of the Plan period and it would be entirely unrealistic to suggest that the minimum housing requirement of 264 dwellings for Southwell had been met and therefore there should be no further residential development in the Town for another 14 years. Such an approach would be a wholly unsustainable stance to take, particularly in light of the well-documented national housing crisis and the fact that the current adopted Allocations DPD itself acknowledges at paragraph 3.4 that *"Southwell does however have a serious local housing need which is perpetuated by high local house prices"*.

At present the adopted Policy So/E/1 covers the Crew Lane Industrial Estate with adopted Policies So/E/2 and So/E/3 allocating 2.71 and 2.18 hectares of employment land respectively, with the former abutting the edge of the Workhouse immediate setting. Adopted Policy So/E/1 made provision for this by requiring that there is the *"provision of appropriate mitigating measures such as landscape screening"* to *"prevent negative impacts on the setting of the Workhouse"*.

The District Council now proposes to deallocate an element of So/E/2 that adjoins Racecourse Road and immediately abuts the Workhouse immediate setting and is affected by flood risk. This suggests that a set-back approach where development north of Crew Lane is an acceptable approach in principle to the District Council.

The proposed development of my client's land would follow this approach which the District Council suggests would be acceptable through its emerging Policy.

Southwell Neighbourhood Plan Policy HE4 supports the development of commercial uses on Crew Lane. The Policy states that *"should the safeguarded land associated with the Southwell by-pass located within So/E/1 on the Proposals Map not be required and should land within*

allocated site So/E/3 on the Proposals Map be considered unnecessary to meet identified employment needs, both may be considered for other uses, for example residential.”

The announcement by the County Council in September 2016 that plans for the By-pass had been scrapped triggered the first part of this policy and opens opportunities to the southeast of Southwell for alternative forms of development, such as residential development.

At paragraph 9.17 of the Allocations and Development Management Plan Review Issues Paper, the updated employment land position for Southwell is set out. This shows that there is a requirement for 4.5 hectares. Once land developed since 2013 and the proposed allocations of 4.10 hectares are taken account of then this results in a total of 6.73 hectares of employment land, which exceeds the identified requirement by 2.23 hectares.

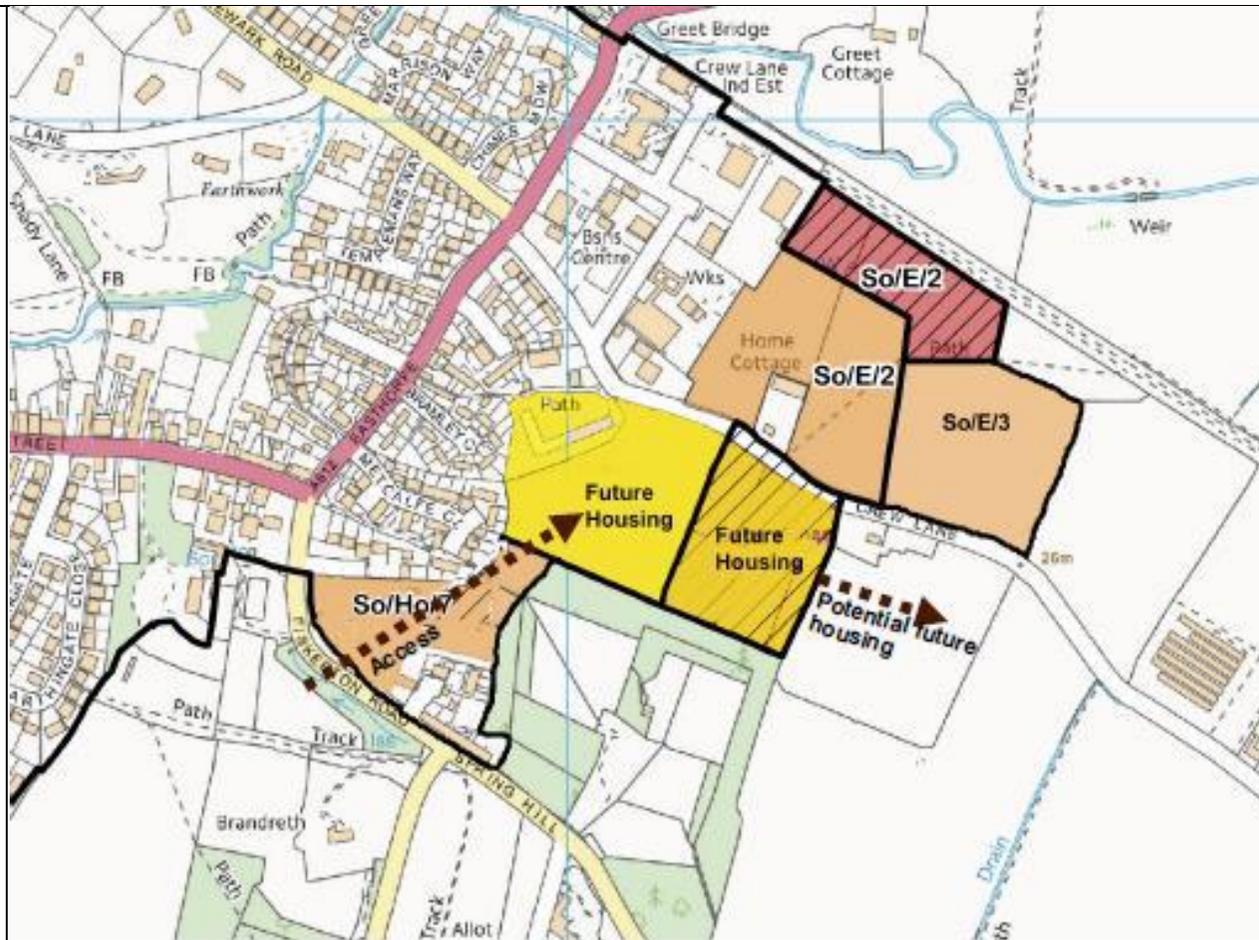
This indicates that the land allocated within So/E/3 would be unnecessary to meet identified employment needs, which triggers the second part of Southwell Neighbourhood Plan Policy HE4. The District Council also proposes to de-allocate part of So/E/2 for reasons of flood risk, the reasons for the de-allocation of part of So/E/3 however are wholly unclear.

The Town Council’s position on this could not be much clearer. They have made provision for such an eventuality through their Neighbourhood Plan and since the announcement by the County Council that the By-pass had been scrapped the Town Council have made representations to the District Council on a number of occasions indicating that they wish to see residential development taking place south of Crew Lane in place of the current employment allocations, with commercial uses to the north of Crew Lane.

As the PPG sets out¹, the vision for neighbourhood planning is that it gives communities the power to shape the development and growth of their local areas. The elected representatives of the local community in Southwell have made it abundantly clear that they see residential growth of their local area as being in a south-easterly direction along Crew Lane, with commercial uses north of Crew Lane. The adopted Policy within their Neighbourhood Plan expressly allows for such an approach. Yet the District Council appear entirely unwilling to engage with the wishes of the local community in Southwell.

It is understood that Southwell Town Council continue to consider that the eastwards growth of the town remains the most appropriate direction for the future growth of Southwell in terms of residential development, as well as allowing for future employment growth of the Crew Lane industrial estate north of Crew Lane and that a representation has been made by the Town Council indicating a preferred allocations strategy as indicated at figure 5.

Figure 5: Southwell Town Council’s Preferred Allocations



In line with the aspirations of the Town Council my client proposes commercial uses on their land north of Crew Lane, set back from Racecourse Road and with appropriate landscaping mitigation to address any concerns over impacts on views from the Workhouse.

The development proposals for my client's land to the north of Crew Lane include the development of a small animal hospital of circa 1,000 sqm which will be operated by the Minster Veterinary Centre. This would provide new specialist employment opportunities for Southwell as

well as providing further synergies with the Nottingham Trent University Brackenhurst campus veterinary and zoology programmes, with the small animal hospital providing research and educational opportunities as well as treatment.

The Minster Veterinary Centre already has a strong well-established relationship with Nottingham Trent University as it provides training support via professional placements for veterinary students.

As an existing local business which is looking to expand its current operations, with the resultant employment and training benefits this would bring, the proposals are considered to accord with the overarching ambitions of Core Policy 6 which supports the establishment and growth of SMEs.

The Southwell Neighbourhood Plan is clear in its support for commercial development at Crew Lane and provides the flexibility to allow for the allocated employment sites to come forward for residential development in the event that the protected route for the bypass is no longer required. My client's proposals for their land north of Crew Lane would meet with the Town Council's aspirations for this area.

My client's land to the south of Crew Lane, which extends to Fiskerton Road, is proposed for residential development which would cross subsidise the construction of the small animal hospital and therefore forms an integral element of the Minster Veterinary Centre's growth plans.

The proposal for residential development on my client's land would abut the land to the south of Crew Lane that the Town Council have made representations to the Plan Review process setting out their aspiration for allocations as residential development.

As the Southwell Neighbourhood Plan Policy HE4 sets out, the opportunity now exists for alternative uses to be explored along Crew Lane given that the protected route for the By-pass is no longer required. Through their representations to the Plan Review process the Town Council have made clear their preference for residential development to the south of Crew Lane and an extension to commercial uses to the north of Crew Lane as preferred allocations for growth in Southwell.

My client's land provides the opportunity for the continued extension of commercial and residential uses to the southeast of Southwell which meets the aspirations of the Town Council and the Neighbourhood Plan which seeks to re-evaluate the proposed uses of the employment allocations along Crew Lane for residential uses in the event that the Southwell By-pass is no longer required.

At paragraph 9.24 of the emerging Allocations and Development Management Plan, the District Council state that once adopted it will become more up-to-date in development plan terms than the Southwell Neighbourhood Plan. It should be noted that the Southwell Neighbourhood Plan covers the period to 2026 whilst the Plan Review covers the period to 2033, a difference of seven years.

			<p>It is understood that the Town Council are investigating taking forward a review of the Neighbourhood Plan. Therefore it is critically important that the District Council addresses the Town Council's preference for extending commercial allocations north of Crew Lane and replacing employment allocations with residential allocations south of Crew Lane in the Allocations and Development Management Plan Review, to ensure that both Development Plan Documents capture the future growth ambitions of the Town.</p> <p>My client supports the Town Council's proposals for commercial uses north of Crew Lane and residential uses south of Crew Lane and would welcome working further with the Town Council to achieve its aspirations for growth to the southeast of Southwell, as well as working with the District Council to assist with achieving the communities ambitions for the future growth of Southwell.</p> <p>Response – Noted – The Council agrees with the proposal by several parties including this representor that So/E/3 would be better considered for other uses in future reviews of the plan. The proposed approach to this will be set out in the Options Report. The potential to increase the size of So/Ho/7 will also be investigated in formulating the Options Report.</p>
34	Historic England	1	No Response - Noted
		3	Yes, it would be helpful in respect of the use of retail frontages and the link with the historic environment/heritage led regeneration. Response- Noted. Given the nature of Newark Town Centre concerns relating to the historic environment/heritage will form an important part of any approach towards its future management.
		4	A review of the test could be helpful in respect of the use of retail frontages and the link with the historic environment/heritage led regeneration. Response- Noted.
		5	If Open Break designation proceeds to review stage, impacts on the historic environment should be taken into account, including impact on heritage assets and setting. Response – The review will acknowledge situations where openness has occurred for historic reasons e.g. presence of a heritage asset but the Open Breaks purpose is to prevent coalescence. Any heritage implications will be addressed through other policies.
		6	It is outside HE's remit to consider the merits of a Tolney Lane Policy Area. However, if this is pursued the impact on the historic environment should be taken into account in relation to designated and non-designated heritage assets and their setting. Development in this area has potential to particularly impact on the Conservation Area, Newark Castle and nearby Scheduled Monuments Response- Noted. Potential impact on the historic environment will be taken account of as part of determining whether a Tolney Lane Policy Area is designated, and the role which the location can play in meeting future gypsy and traveller needs.

		8	Synergies between the natural and historic environment should be considered due to the opportunities for enhancement and better revealing the historic environment as part of any open space strategy Response – Noted.
		10	Yes, BfL12 offers good opportunity to ensure local distinctiveness is captured and for new development to make positive contributions to place all of which can enhance the historic environment. Response – Noted.
		11	Yes. Response – Noted.
		13	NFC as previously allocated and/or with permission Response – Noted.
35	Delta Planning obo Simons Developments	12	<p>Para 9.1 of the Issues Paper states that sufficient capacity exists to more than meet the minimum requirements for both housing and employment in line with the Core Strategy and that no new allocations will therefore be identified through the Allocations & Development Management document.</p> <p>With regard to employment land, a supply of 104.6ha has been identified against a requirement of 51.9ha including completed development sites, sites with planning permission (such as Land South of Newark) and sites allocated in the Core Strategy or considered to be suitable for allocation.</p> <p>Interrogating the employment land supply in detail reveals that there are only two sites of a strategic nature which would be suitable for a strategic logistics/industrial user; NAP2A and NUA/E/2. The remaining supply is made up of sites that are too small in size to accommodate large footprint occupiers or are allocated for other uses, such as Land around Fernwood (NAP2C) which is allocated for a mix of uses including 15ha of land for offices.</p> <p>Whilst of a sufficient size to accommodate a range of occupier requirements, we consider that the employment site NAP2A has a number of short-medium term delivery issues and is unlikely to come forward until the latter stages of the Local Plan period. Although it has an outline planning permission (as part of the wider outline for Newark South, now called Middlebeck Newark) it is notable that the site has been marketed for some years without success and its current marketing is very low key whilst delivery of infrastructure is awaited. The site requires a link to be provided to the new Southern Link Road which is yet to be constructed. The developer’s website notes that the delivery of the next phase of the relief road is linked to housing delivery and subject to funding. The lack of immediate deliverability is a key issue for this site as the strategic logistics/industrial market is driven by occupiers looking for ‘oven-ready’ sites that can be delivered quickly. The site also lies in a slightly peripheral market location and is separated from the main urban area of Newark with no established employment areas nearby. Currently, employment uses in the area are concentrated at the north-eastern edge of Newark in close proximity to the A1, A46 and A17.</p>

		<p>Apart from the strategic site allocation NAP2A we are aware of only one other site in Newark with potential to accommodate large logistics/industrial users – Brunel Park, Newark (NUA/E/2) and the adjacent G-Park, Brunel Drive, Newark. Despite years of marketing, and in the case of G-Park a previous consent for employment uses, these sites have not been taken up for employment uses. We consider that these sites have a fundamental problem with access which is via the local road network. This makes the land unsuitable and unattractive for a large footprint industrial or logistics occupier. In our opinion these sites are only suitable for local employment needs and the continued protection for employment may even need reconsideration as encouraged by the NPPF.</p> <p>Response – Noted. See response to Q14 below.</p>
	14	<p>As outlined in our response to Question 12, we consider that the only two sites suitable for a strategic logistics/industrial user have serious delivery issues. There is therefore no high quality and immediately deliverable site in Newark that is available for operators looking for large high quality sites and we consider that this lack of strategic land allocations will constrain investment in the District. We submit that an additional allocation should be identified in the Allocations and Development Management Plan to supplement the existing employment land supply and offer a greater choice of sites to potential businesses seeking to locate or expand in the District, and in particular to attract inward investment.</p> <p>It is submitted that Land to the east of Newlink Business Park offers the best location for such additional employment growth as set out in more detail in the Site Supporting Statement submitted with these representations.</p> <p>The site extends to approximately 48.3 hectares and currently comprises agricultural land. It lies immediately east of the Newlink Business Park.</p> <p>Newlink Business Park is a highly successful distribution location. The first phase of the site was built in 2003 with a second major phase following in 2006. Combined these provide some 134,000 sqm of floor space. A third and final phase for a further 17,236 sqm was granted permission in 2010. The site is occupied by the Logistics and Services Division of DSG Retail Ltd (part of the Dixons Carphone Plc group). It is the principal National Distribution hub for direct store replenishment, home deliveries and returns. It also accommodates the group’s main service repair centre, Knowhow. It is one of the largest sites of its kind in Europe and employs 3,000-4,000 people. It is understood to be the largest employer in the Newark area.</p> <p>The site is strategically located with direct access off the A17. It lies immediately to the east of the A1, A17, A46 interchange and benefits from excellent connectivity north and south via the A1/A1M and onto the M1.</p> <p>As shown in the Site Supporting Statement, the site is immediately available and deliverable. There are no known technical or land ownership constraints. An initial masterplan for the site has been prepared and shows how the site could accommodate a range of large footprint user requirements within Use Class B2 and B8, with a total potential floor space of some 185,000 sqm.</p>

			<p>It is envisaged that the site would come forward in phases, with a first phase of development of circa 40,000 sqm to proceed ahead of the A46 upgrade scheme in 2020-2022 and the remainder once that is secured (2025-2030). Detailed discussion is currently underway with Highways England on the traffic implications of the proposal and phasing strategy, which has included the submission of a draft transport assessment, and these discussions have been very positive.</p> <p>It is considered that the site should be included as an additional employment allocation in the Allocations and Development Management document to increase the supply of sites of a sufficient size to accommodate strategic logistics/industrial occupiers in the District.</p> <p><i>Supporting Statement also provided.</i></p> <p>Response – The site is located between the A1 and A17 adjacent to Newlink Business Park, which is accessed off the A17. It lies approximately 0.5 km from the A1/A46/A17 junction. Simons acknowledge that there are presently known capacity constraints at this junction and along the A46 corridor.</p> <p>As set out above, sufficient employment land has already been identified within the Plan Review process. Major infrastructure improvements to the A46 were announced for the second Road Investment Strategy which detailed the following programme of works for Newark: “A46 Newark northern bypass – widening of the A46 north of Newark to dual carriageway, raising the last section of the A46 between the A1 and M1 to Expressway standard. Improvement of the A46/A1 junction to allow for better traffic movement to Newark and Lincoln.” It is believed that more detailed plans for these works are anticipates by the end of 2019.</p> <p>It is considered that the need for additional strategic employment land should be more appropriately considered as part of the next round of Plan making when the proposals for the implementation of road improvements will be further progressed. This document forms part of the Plan Review and the strategic policies detailing the housing and employment provision have already been found sound through the Adoption of the Amended Core Strategy DPD.</p>
36	Mansfield District Council	1	<p>Yes. It is considered that the assessment in Section 2.0 of the document correctly identifies the key areas where amendments are likely to be required to the policies in the adopted Allocations and Development Management DPD.</p> <p>Response – Noted.</p>
		2	<p>Yes. One of the main changes to Government policy is the amended definition of affordable housing. It would be appropriate to make modifications although flexibility should be included to allow for future changes in Government policy.</p> <p>Response – Noted.</p>
		3	<p>Yes. It is appropriate to take account of changes to the supply of retail floorspace in and around the district. The challenging trading circumstances for retail and town centre uses increase the need for a flexible approach to town centres. Removing refernces to primary and secondary frontages would also accord with the NPPF at paragraph 85b which refers only to primary shopping areas.</p>

			Response – Noted.
		4	<p>While the aim of protecting town centre vitality and viability through reducing the threshold for the impact test for leisure uses is generally supported consideration will need to be given to the evidence base to justify the threshold and the evidence used to inform impact assessments. The impact of leisure floorspace is likely to be harder to predict compared to retail floorspace.</p> <p>In relation to excluding small scale retail development from the sequential test, consideration will need to be given to any rural communities which are located close to a centre in a neighbouring district. Allowing retail floorspace without a sequential test in these locations may affect vitality and viability in these centres.</p> <p>Response – Noted. The purpose to excluding small-scale retail would be to directly support the sustainability of rural settlements. The scale and form of such development would need to be consistent with this objective – being restricted to that which would serve the needs of the settlement in question. It is intended that appropriate safeguards would be built into the approach, but that the Local Impact Test Thresholds included within Core Policy 8 of the Amended Core Strategy would provide this with respect to the matter of scale.</p>
		6	<p>It is considered appropriate to designate the identified area to ensure that there is a clear policy basis for future decisions related to the site. The number of pitches which would be acceptable on site could also be identified.</p> <p>Response – Noted.</p>
		7	<p>As you will be aware, Mansfield District Council are in the process of preparing a Gypsy & Traveller DPD with the aim of identifying pitches/plots. As part of the Duty to Cooperate we will work together closely to ensure that needs can be met in appropriate locations.</p> <p>Response – The District Council welcomes Mansfield District Councils continued commitment to joint working.</p>
		10	<p>Yes. The NPPF (paragraph 129) supports the use of assessments frameworks such as Building for Life 12.</p> <p>Response – Noted.</p>
37	Natural England		No Comments
38	Savills obo Midlands Land Portfolio Limited and partner	12	<p>This submission has been prepared by Savills (UK) Ltd on behalf of the Landowner, Midlands Land Portfolio Limited and their planning promotion partner Northern Trust Company Limited. We write to promote the Land at Bulcote Steading, Bulcote ('the site') for residential development. These representations are made in response to the Newark and Sherwood Local Plan Review, Allocations and Development Management Issues Paper and follow a full suite of representations which have been made in support of the site, including representations made in support of the site in response to the Bulcote Neighbourhood Plan.</p> <p>These representations have been made in the context of the pending planning and listed building applications which have been submitted to Newark and Sherwood Council (NSC), regarding the land, buildings and listed buildings at Bulcote Steading, as identified on the site location plan included at Appendix 1. Planning Applications Ref. 15/00784/FULM and 17/02325/FULM and Listed Buildings Consent (Ref. 12/00785/LBC) were submitted to NSC in 2015 and 2017 seeking the redevelopment of the farm buildings to accommodate residential development, and associated enabling residential development on the site. These applications are currently under determination with NSC.</p>

The site

Bulcote Steading is located approximately 12km to the north-east of Nottingham on the south-eastern periphery of the Village of Bulcote, north-east of the settlement Burton Joyce. Both villages have a joint population of over 4,000 people. The site is located on the south-westerly fringe of Newark and Sherwood District, adjoining the neighbouring Borough of Gedling.

Bulcote Steading is a nationally important Grade II Listed farm complex in Nottinghamshire. The buildings have a collective group value demonstrating a fine example of a very late model farm within the English Model Farm Movement (1700-1914). Being Grade II Listed, Bulcote Steading is a heritage asset of significance and national importance. The farm buildings were listed Grade II in February 2005 along with the adjacent Field House and Corporation Cottages, Although not specific on the list entry, these buildings have a degree of group value and a relationship in terms of their location and setting.

The majority of the site is located within the southern edge of the Bulcote Conservation Area. Bulcote Farm on the north side of Old Main Road, lies outside, but within the setting of the Bulcote Conservation Area. There are also a number of Listed and Local Listed Buildings within the vicinity of the site. The development is accessible by public transport, with a bus stop within short walking distance of the site providing two bus services per hour to Southwell and Nottingham. The site is also located close by to Burton Joyce Rail Station, which is located 1.9km from the site, providing location and regional connections.

Case for Allocation

Heritage

The Newark and Sherwood Amended Core Strategy was adopted in March 2019. Adopted Core Policy 14 relates to the Historic Environment. This policy promotes ‘...positive action for those heritage assets at risk through neglect, decay, vacancy or other threats’. This is reflective of the national position, outlined within the NPPF which affords ‘great weight1; to the conservation of heritage assets.

Extensive discussions have taken place between the applicants, NSC and Bulcote Parish Council over many years. It is common ground that, irrespective and without prejudice to the determination of the current planning applications, a long term future has to be found for the listed buildings and this is most likely to be based on residential use and will include some enabling development to bridge the heritage deficit. The debate is now about extent.

We are therefore seeking a site specific allocation which covers the Bulcote Steading site and surrounding land. Such an allocation would be a ‘special policy area’ which is reflective of the heritage objectives and benefits which an acceptable development proposal can deliver.

Rural Development

Spatial Policy 3 of the adopted Core Strategy supports development within the countryside which enhances heritage assets as well as the re-use or redevelopment of former farmyards/ farm buildings. Bulcote Steading is located in the Nottingham Fringe Area within the Core Strategy, no specific policies are put forward for this area due to the major constraint of the Nottingham-Derby Green Belt. As such, the allocation of Bulcote Steading would maximise the unique opportunity to direct development to this rural area, in line with the NPPF and adopted Core Strategy, benefitting the vitality of both Bulcote and Burton Joyce, utilising a site upon which the principle of development has been accepted.

Deliverability

Paragraph 16 of the NPPF requires Local Plans to be aspirational but deliverable, and prepared with the objective of contributing to the achievement of sustainable development.

As afore mentioned, the principle of the development of Bulcote Steading for residential development, including some enabling development has been established through the course of the live applications relating to the site. The extent of the proposed development on site is now the only matter of negotiation.

Technical reports have been prepared and submitted in support of the site, to demonstrate that it is both deliverable and developable. The landowners and their development partners are committed to the delivery of development at the Land at Bulcote Steading, and the preservation of historic assets on the site. It is envisaged that a sensitive development could be delivered on site within 5 years of the receipt of planning permission.

Summary

In summary, the land at Bulcote Steading is clearly deliverable and developable and the requirement for development to come forward on the site to ensure the long term protection of the heritage assets, has been accepted. With this in mind, Bulcote Steading should be allocated within the Local Plan Review in recognition of the important contribution it will make towards supporting the long term preservation of the farmstead, which is currently largely vacant. The NPPF is supportive of development in this location, stating that ‘great weight’ should be afforded to the preservation of heritage assets. The allocation of this deliverable site will contribute to NSC housing delivery in the District and more locally to the rural economy and vitality of Bulcote, utilising a site which is made up of brownfield and greenfield land.

Response – Noted. However, Bulcote lies with the Green Belt and is not one of the Settlements Central to delivering the Spatial Strategy as set out in the Adopted Amended Core Strategy. Allocation of this site is not therefore considered appropriate.

39	Home Builders Federation	1	<p>The Council should remain open-minded because as the Allocations & Development Management LPR progresses it may become necessary to review policies not intended to be changed in response to more recently published national guidance and / or outcomes from the Government's forthcoming Planning Green Paper and / or the Building Better, Building Beautiful Commission.</p> <p>It is agreed that Policies DM2 : Development on Allocated Sites and DM3 : Developer Contributions & Planning Obligations should be reviewed to take account of new national policy and guidance on viability assessment and developer contributions. Policies DM2 and DM3 should set out the contributions expected from developers including the level and types of affordable housing provision required and other infrastructure for education, health, transport, flood & water management, open space, digital communication, etc. As set out in the 2019 National Planning Policy Framework (NPPF) such policy requirements should not undermine deliverability of the Allocations & Development Management LPR (para 34). The cumulative burden of infrastructure, other contributions and policy requirements should be set so that most sites are deliverable without further viability assessment negotiations (para 57). It is important that the Council understands and tests the influence of all inputs on viability as this determines if land is released for development. The Council should undertake an updated viability assessment. The Council's Issues Paper does not set out the proposed approach to changes to Policies DM2 and DM3 therefore the HBF may make further comments on this matter during later consultations as preparation of the Allocations & Development Management LPR progresses.</p> <p>It is also agreed that Policy DM7 : Biodiversity & Green Infrastructure should be reviewed to take account of new national policy on biodiversity and habitats. The Council's Issues Paper does not set out the proposed approach to changes to Policy DM7 therefore the HBF may make further comments on this matter during later consultations as preparation of the Allocations & Development Management LPR progresses.</p> <p>A separate policy for meeting the needs of an ageing population as set out in the recently published national guidance (NPPG ID63-001 to 019) dated 26th June 2019 should be considered by the Council.</p> <p>Response – It is agreed that the District Council should remain open minded in carrying out the Local Plan Review. The comments on DM2, DM3 and DM7 are noted. Core Policy 3 sets out District Council policy on meeting the housing needs of the elderly population of the District.</p>
		2	<p>It is agreed that the Council should update its Affordable Housing Policy in relation to site thresholds, requirements for 10% affordable homeownership and entry level exception sites.</p> <p>Response – Noted.</p>
		5	<p>It is agreed that Open Break designations should be subject to detailed review.</p> <p>Response – Noted.</p>
		9	<p>The HBF agree with the Council's approach to the designation of LGS as part of Neighbourhood Plans provided landowners and / or developers are properly consulted about proposed LGS designations during both the preparation and examination of Neighbourhood Plans.</p> <p>Response – Noted.</p>

10	<p>The HBF is supportive of the use of Building for Life 12 as best practice guidance to assist the Council, local communities and developers assess new housing schemes. The HBF has played a fundamental role in establishing Building for Life 12 but it was never intended to become enshrined as a mandatory policy requirement in Local Plans. The use of Building for Life 12 should remain voluntary rather than becoming a requirement of Policy DM5 : Design which would oblige developers to use this tool. If the Council wishes to refer to Building for Life 12 it should be in the supporting text of Policy DM5. If Building for Life 12 was introduced as a mandatory requirement of Policy DM5 then the Council should assess any viability implications. The Council cannot assume that there are no additional costs as the creation of place in terms of local character and site context may involve specific elevational treatments / materials. The Council should also clearly set out the assessment of residential development against Building for Life 12 by expecting a positive performance against the criteria but without achieving a prescribed number of greens under the Building for Life 12 traffic light system of assessment.</p> <p>Response – Noted. The Council is considering whether to introduce a more standardised way of discussing layout and design with applicants the benefits of which we believe are clear for both parties. Given the standard is limited to urban design issues and does not seeks to introduce specific standards of building design and performance the Council understands that the viability implications are limited. However the comments are noted and will considered as the policy developed.</p>
12	<p>Housing Allocations</p> <p>It is acknowledged that the Allocations & Development Management LPR is the delivery document for the recently adopted Amended Core Strategy. However it is noted that the Amended Core Strategy was examined under transitional arrangements so its adopted housing requirement was based on an Objectively Assessed Housing Need (OAHN) rather than the Government’s standard methodology for calculating Local Housing Needs (LHN) as a consequence the Council’s adopted housing requirement figure is less than LHN. The adopted housing requirement is a minimum and not a ceiling to sustainable development therefore the Council is encouraged to provide as large a contingency as possible above the adopted housing requirement in the Housing Land Supply (HLS) to ensure that housing needs are met. A large contingency provides more flexibility to response to changing circumstances and to provide greatest choice and competition in the land market. There is no numerical formula to determine the quantum of a HLS contingency but where the HLS is highly dependent upon one or relatively few large strategic sites in one locality then greater numerical flexibility is necessary than if the HLS is more diversified. The widest possible range of housing sites by both size and market locations should be sought to provide suitable land for small local, medium regional and large national housebuilding companies. A diversified portfolio of housing sites offers the widest possible range of products to households to access different types of dwellings to meet their housing needs. Housing delivery is maximised where a wide mix of sites provides choice for consumers, allows places to grow in sustainable ways and creates opportunities to diversify the construction sector.</p> <p>Response – The Council has made sufficient provision for development within the District to meet the housing requirement along with additional flexibility in the form of opportunity sites.</p>

			<p>It is noted that the Council state no new housing site allocations are proposed. As set out in the 2019 NPPF (para 68a) at least 10% of the housing requirement should be accommodated on sites no larger than one hectare or else demonstrate strong reasons for not achieving this target. The Council should confirm that this national policy requirement has been achieved.</p> <p>Response – The Amended Allocations & Development Management DPD will update the position on the allocations set out in the current Adopted Allocations & Development Management DPD in accordance with the spatial strategy set out in the recently Adopted Amended Core Strategy. This document was examined under the transitional arrangements. Making additional provision for 10% of the housing requirement on sites of no larger than 1 hectare is not possible given the current spatial strategy within the recently Adopted Core Strategy. New allocations would need to be identified which would be in addition to the identified supply which already incorporates a generous level of flexibility. There is a risk of unsustainable levels of development resulting which were not envisaged within the Plan. The Plan making process is designed to provide a level of certainty for both developers and the general public. We have already seen significant levels of completions (over 10% of the housing requirement) on sites under 1 hectare within the Plan Period and there is no reason to conclude that this will not continue. It is considered that in this instance, strong reasons can be demonstrated the provisions of NPPF paragraph 68(a) can not be achieved in this manner.</p>
		13	<p>The HBF is supportive of the Council's opportunity site approach if the SUEs in the NUA do not come forward as anticipated. There is no numerical formula to determine the appropriate quantum of opportunity sites but where the HLS is highly dependent upon one or relatively few large strategic sites in one locality then greater numerical flexibility is necessary than if the HLS is more diversified. The HBF do not comment on the merits or otherwise of individual sites selected as opportunity sites.</p> <p>Response – Noted.</p>
		14	<p>Conclusion</p> <p>For the Newark & Sherwood Allocations & Development Management LPR to be found sound under the four tests of soundness as defined by the 2019 NPPF the Plan should be positively prepared, justified, effective and consistent with national policy (para 35). It is hoped that these responses are of assistance to the Council in preparing the next stages of its LPR. If any further information or assistance is required please contact the undersigned.</p> <p>Response – Noted.</p>
40	P&DG obo NSK	1	<p>Please see our comments in response to Question 13.</p> <p>Response – Noted, see response to Q13.</p>
		12	<p>Please see our comments in response to question 13. Should remaining allocations not be deemed to come forward then there should be sufficient flexibility provided by other allocations, not potential opportunity sites. The latter provides no certainty in planning terms.</p> <p>Response – Noted, see response to Q13.</p>
		13	<p>P&DG do not agree with the principles of the Issues Paper review to specify 'opportunity sites'. Sites that are previously allocated should remain allocated to give full confidence to the market. Relisting them as 'opportunity sites' offers far less certainty at a time of great economic uncertainty. It would also appear to be a premature, short term adjustment to a plan that depends upon strategic sites to deliver its outcomes. On behalf of our client we believe the plan needs to once again provide a degree of acknowledgement that allocations on a</p>

strategic scale require such designation through the plan period for the site's potential to be fully realised. With a regeneration site of great potential and a willing landowner in NSK Europe Ltd this is all the more relevant.

The Plan Review's current proposals to downgrade the proposed designation for NUA/MU/3 "Land at NSK Factory, Newark" from an allocation to an opportunity site is premature, inflexible, and is not supported. In order for NSK Europe Ltd to remain in Newark they will require a suitable alternative location which has not yet been sourced despite a strong willingness to do so, and to a large extent this will depend upon maximising the value obtained from the current site. Deallocating the site on the basis that there is no fixed timeframe to transfer to a new site will not provide any certainty to businesses and investors who may be interested in site NUA/MU/3 should NSK Europe Ltd then find the alternative site. Our previous representations to the Local Plan has suggested that the Northern Road site is not suitable to future expansion requirements and cannot operate to full efficiency. Its value as a proposition would be weakened by the proposals. As such there is a very real and present risk that the proposed change to the policy designation of this site will actually damage NSK Europe Ltd's ability to relocate in Newark, and contrary to National Planning Practice Guidance (NPPG) the plan may not be sound in its ability to respond effectively to business requirements.

Furthermore, it is common knowledge that we are at a time of significant global economic uncertainty and nationally this is compounded by Brexit. This has already had a significant bearing upon decisions made internationally by multinational corporations, including Japanese industries' investments in the UK that rely upon decisions made globally. Now is not the time for the Local Plan to deallocate this site. The NPPF is clear that plans must be proactively prepared and do all they can to be resilient to often rapid economic challenges, and unlock development potential and delivery of its allocations. If the review goes ahead with the designation of the NSK Europe Ltd site as an opportunity site, then this is likely to fuel the ever present risk of whether the business is able to expand in Newark and if it remains possible. Business requires the planning policy process to be flexible in the short and long term to plan ahead for its needs.

Downgrading the site in the proposed way does not mean anything in planning terms, only an allocation would provide a meaningful and robust means of providing for growth in the plan. Deallocation refocuses the plan to be more reliant than it ever needed to be on a smaller number of sites that the Council may perceive as more deliverable; time and time again it is suggested that plans must positively allocate for growth, as a minimum. It would appear that the proposed plan review goes against the grain of these principles; rather than be a potential opportunity the deallocation of NUA/MU/3 would represent a missed opportunity. The site has already been through significant testing informing the present allocation, which would demonstrate its suitability in the plan period. The site after all continues to be in a highly sustainable location on the edge of the town centre and near to Northgate railway station.

In summary, a short term decision by reconsidering allocations in this way will do the NSK Europe Ltd site no favours; they require an existence in the plan in the long term, to respect the phased delivery of a key regeneration scheme offering much potential. Its implementation will not take place overnight, and not all of it in the shorter term part of the plan period. Regeneration sites require time to

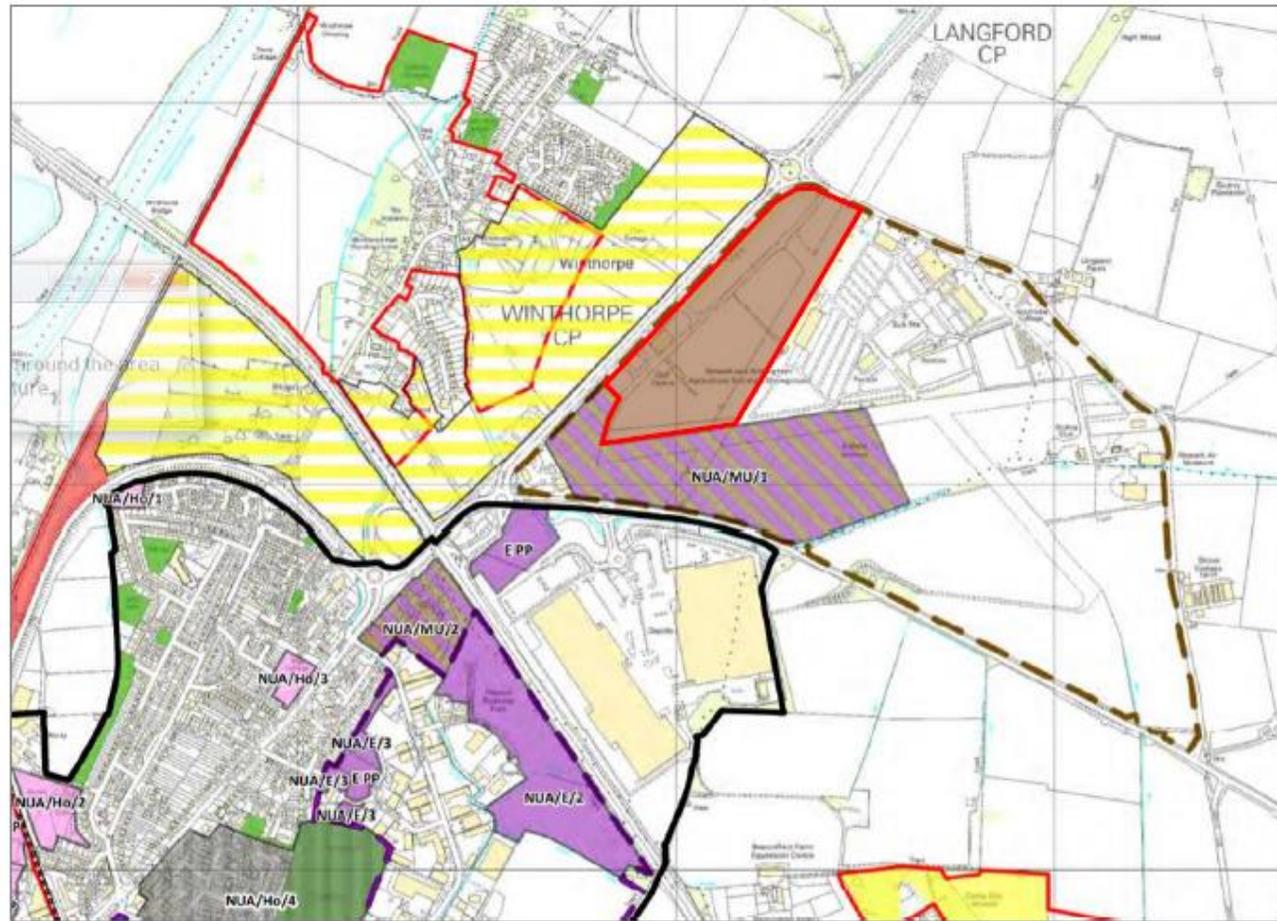
			<p>progress and with that will come incremental increases in market interest and accordingly development potential. The intention of NSK Europe Ltd is still to deliver the site within the plan period and as such the site should only be an allocation and reviewed as an allocation. The new NPPF already provides for a rolling programme of at least 5 yearly plan reviews whereby a site's position as an allocation could be assessed, but a review should not be coordinated in such a way that would undermine the likelihood of an allocation coming forward which is to the heart of our reservations at present.</p> <p>The need for NSK Europe Ltd to adapt to a changing economy, global market, alongside its desire to maintain a presence in the town was key to the submissions made leading up to the present allocation. This position has not changed, but the Issues Paper as drafted is placing clear and significant risks upon that approach while the search for an alternative site continues. We question the soundness of the approach taken at present.</p> <p>Response – Noted. However as set out in the options report, the site is not being de-allocated but rather re-designated as an opportunity site. There is no longer a requirement for the long term allocation of retail floorspace and there is no certainty over delivery timescales. The Local Planning Authority needs to strike an appropriate balance between identifying sites which may come forward during the Plan Period and ensuring that the allocated sites are deliverable. It is considered that the most appropriate way to give some certainty to NSK Europe Ltd without undermining the deliverability of the Plan is to re-designate it as an Opportunity Site.</p>
		14	<p>NSK seek to continue to be informed during the next stages of the Local Plan Review.</p> <p>Response – Noted.</p>
41	Peacock & Smith obo Gleeson Developments	2	<p>Yes, the revised NPPF is a significant material consideration. Affordable housing policy should reflect the wider definition of affordable housing as set out at Annex 2 of the Framework in particular.</p> <p>Response – Noted.</p>
		14	<p>We have concerns that a) the Council has failed to allocate land at Oldbridge Way, Bilsthorpe for housing in accordance with a grant of detailed planning permission; and b) that more land should be allocated for housing in Bilsthorpe.</p> <p>In respect of Point a) above, Land at Oldbridge Way benefits from an extant outline planning permission (ref: 16/01618/OUTM) for 113 dwellings and a recent reserved matters consent (ref: 18/01971/RMAM). In addition, Gleeson are in discussions with the landowner to bring forward the site for housing and our client has recently held planning discussions with the Council on this basis. The Gleeson development would be for circa 120 dwellings on the site and we can confirm this would mitigate its own impacts and provide for 30% low cost affordable housing as defined by the NPPF (Definition d)).</p> <p>In such circumstances we consider that there is no justification for not reflecting the planning status of this site by listing it as an allocation within the Issues Paper. The site is suitable and clearly viable given the interest by Gleeson. Furthermore, as both of the other two housing-related allocations proposed in Bilsthorpe (Bi/MU/1 and Bi/Ho/2) have, or recently had, planning permission, there is no reason to treat land at Oldbridge Way differently.</p>

			<p>Regarding Point b) above, Bilsthorpe is a sustainable settlement with a primary school, library, GP surgery, village hall and a number of businesses that provide employment opportunities. The grant of planning outline permission for the proposed development of Bi/MU/1 proposes 3,000 sq.ft of retail floorspace, and the proposed energy centre at Bilsthorpe Colliery would create new local job opportunities. In view of these sustainability facets we consider that Bilsthorpe is a suitable location for a greater quantum of housing than is proposed by the Issues Paper, and this would provide for a more effective and robust portfolio of sites in the event that there are any delivery issues with the allocations proposed by the Council.</p> <p>We would also point out that the amended Core Strategy does not prevent the allocation of additional sites in Bilsthorpe, since the housing requirement for the settlement is a 'minimum' requirement.</p> <p>Response – The site at Oldbridge Way Bilsthorpe lies outside of the existing Village Envelope and was granted permission at a time when the District Council was unable to be certain of a developable five year land supply. The site has permission with a limited time for implementation in order to boost the supply of housing in the short term. Should development on this site lapse, further permissions may not be considered favourably as the position with the five year land supply is now more positive. This site is therefore not proposed for allocation.</p>
42	Framptons obo The Welbeck Estate	12	<p>These submission are made directly in response to:</p> <ul style="list-style-type: none"> - paragraph 9.47 - 9.49 - paragraph 9.55 <p>A planning application is being prepared for mixed-use development in accordance with the provisions of Policy CI/MU/1. The masterplan will show the retention of the headstocks.</p> <p>As such it is submitted there is no cogent evidence to suggest that these allocations will not come forward.</p> <p>Response – Noted.</p>
43	Philip Hemsall	14	<p>Small village settlements close to a Principal Village, with existing safe suitable access roads connections should be considered suitable for development.</p> <p>Response – Development proposals will be considered against the provisions of Amended Core Strategy policy SP3 Rural Areas.</p>
44	North Muskham Parish Council	1	Yes. No further matters to be addressed. Response - Noted
		2	<p>Our village has recently had an affordable housing development built on an exception site on Main Street. One issue that should be addressed is the use of the word 'need' and serious consideration should be given to establish a limited length of time for this consideration to be referred to.</p> <p>Response – Entry-level exception sites differ to the Rural affordable housing policy exception sites in that they do not have to demonstrate need.</p>
		3	Yes, viability of town centres is of primary importance.

			Response – Noted.
		5	While not relevant to North Muskham, open breaks are there to protect the communities they relate to and should be respected. Response – Noted.
		6	Yes, so that all parties are aware of the constraints associated with this area. It should address all relevant issues, especially unauthorised development. Response – Noted.
		7	Site allocation should be correct for all the community involved, not just for one section of it. Response - Noted. Core Policy 4 in the Amended Core Strategy provides a geographic basis for the allocation of land to meet gypsy and traveller needs, with the criteria in Core Policy 5 providing an appropriate basis to ensure that potential sites are suitable in terms of their potential impact.
		8	Open Space should be maintained for the benefit of all and any threat to it should not be entertained. It should automatically be considered as important as the Green Belt and protected as such. Response – Green Belt is afforded a high level of protection which national policy does not support for more general use. New and existing Open Spaces may be identified through a Neighbourhood Plan and protected as Local Green Space but Council cannot make the process “automatic”. SP8 is considered strong enough for general purposes.
		9	See above Response – Noted.
		10	Yes, buildings should always be built to the highest possible standard and their design should not impact on the character of the area they are proposed for. Response – Noted.
		11	That is a matter for Southwell Town Council and the communities that would be affected by such an approach. Response – Noted.
		13	Yes, but given the number of dwellings contained within those opportunity sites there must be the infrastructure in place to support them and existing residential areas. Response – Noted.
45	Dunham on Trent with Ragnall, Darlton and Fledborough Parish Council		No comments

46	Aspbury Planning obo landowners	14	<p>This representation is made on behalf of The Newark & Nottinghamshire Agricultural Society (N&NAS) and landowners of the areas to which this representation relates, that is, the 'Newark Showground 'Triangle' and, specifically, land north of the A17 and east of the A46 at Winthorpe.</p> <p>N&NAS is currently involved in a major review of its strategic objectives for the future of the 'Showground' (East Midlands Events Centre [EMEC]) at Winthorpe. The draft objectives are set out in the attached draft Note, although this is subject to further review. The Society is currently engaged in a round of stakeholder meetings, including with the District Council, the County Council, The LEP and the Midlands Engine to promote this strategic review, to secure stakeholder buy-in, and with the ultimate objective of producing a new –Master Plan-led Strategic Plan for the Showground and environs. In doing this the Society is actively engaging and co-operating with the other major landowner within the defined Newark Showground Policy Area, the Hounsfield family.</p> <p>As will be seen from the Note, the two key elements of the emerging strategy are:</p> <ul style="list-style-type: none"> • a major improvement to the Showground/EMEC as an events venue, rendering it fit for purpose in the 21 Century and second only to the NEC within the Midlands Region as a facility; • the funding and facilitating of the upgrading of the operational estate through the disposal and development - in conjunction with the Society's immediate neighbours of the land that is, amongst other things, surplus to the operational requirements of the Society, fronting (east of) the A46, together with the land already allocated as Mixed Use Site 1 (Policy NUA/MU/1), north of the A17. <p>To this end we propose:</p> <ul style="list-style-type: none"> o retaining Policy NUA/SPA/1 – 'Newark Urban Area – Newark Showground Policy Area', but with the bullet 'the need to adequately screen new development' deleted in favour of "the need to achieve high quality sustainable building design and comprehensive integrated landscaping." o amending Policy NUA/MU/1 and the Proposals Map (see attached plan) to include the land fronting and to the east of the A46 and retitling it "Employment-led Mixed Use Site 1 and the text as follows: "Land North of the A17 and East of the A46 is allocated for employment-led mixed use development...." And the third bullet point to: <ul style="list-style-type: none"> • "Within the context of the Master Plan, phasing the scale and timing of development to accord with the programme for the upgrading of the A46 (T) Newark By-pass, including improvements to the A1/A46/A17 junction. In the meantime, any development will need to demonstrate that it will not have a detrimental impact on the free and safe flow of traffic on the A46, A17 and A1 Trunk Roads."
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			<ul style="list-style-type: none">○ The wording of both policies and/or the supporting text to them in the Plan to be amended/augmented to acknowledge the regional significance of the Showground and also of the extended NUA/MU/1 Policy area and the potential/significance of the latter, by virtue of its overall size, strategic location and character, as a major 'inward investment' opportunity site.
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Proposed extension to NUA/MU/1

Newark & Nottinghamshire Agricultural Society

Strategic Objectives for the Winthorpe Estate to 2030

- For the 'Showground' to be recognised as the premier multi-purpose events venue in the East Midlands and second only to the NEC within the Midlands Region. This is to be achieved by:
 - Re-branding and significantly raising the profile, awareness and recognition of the Site as a regionally and nationally important facility;
 - Progressively increasing and improving the quantity, quality, range, variety and flexibility of event accommodation and of complementary/ supporting services and facilities, so as to be relevant and attractive to the evolving and diverse market for outdoor and indoor events, exhibitions and conferences in the 21st Century;
 - Substantially enhancing the environmental sustainability, resilience and efficiency of the venue in the design, construction, upgrading/adaptation and operation of buildings and by maximising the generation or renewable energy on-site - as a commercial/operational/economic objective in itself, but also to demonstrably enhance the credentials and reputation of the Society as a socially/environmentally responsible organisation and to widen the appeal of the venue to the market;
 - Establishing the venue as an exemplar/demonstrator of state-of-the art smart technologies and as a digital hub, so as to enhance the efficiency of its operation and functionality and to broaden its attraction and marketability;
 - (Whilst appealing to a broad market spectrum for events of all types) Developing a unique/specialised role as a centre for education in and promotion of the wider public understanding of sustainable agriculture, food production and the rural economy and society, consistent with the charitable aims and objectives of the N&NAS;
- Establishing, identifying and promoting the land – *primarily* fronting the A46/A17 Trunk Roads - that is in the ownership of (and surplus to the continuing operational needs of) the Society itself and also of our immediate neighbour (the Hounsfield family) – amounting together to some 30 hectares + or thereabouts - as an investment and development opportunity of regional significance. This will in turn secure two subordinate objectives: To provide:
 - the financial resources to reinvest in and fund the further enhancement and development of operational facilities as described above; and,
 - To provide needed commercial facilities (e.g. hotel, nursery/crèche/food and drink/convenience retail) complementing the primary operational function of the Showground and thereby enhancing the attractiveness of the venue to the market - and similarly complementing the development of the rest of the non-operational land.

To be achieved by and/or involve:

- establishing (a) partnership(s)/joint venture(s) with commercial investors, developers and operators (and with relevant public sector stakeholders as necessary) to deliver development;
 - insofar as it is relevant to the market, viable and commercially deliverable, giving priority within such development to accommodating uses/ activities/enterprises concerned with the agricultural sector and food/ beverages industry (including research and development and production/ processing) and with technology/engineering related thereto;
 - developing a secondary/further/higher educational ‘campus’ explicitly related to agriculture and food to complement the above;
 - theming the two preceding elements around sustainable agriculture and food production aimed at arresting climate change.
- Working with national regional and local stakeholders/partners to ensure that:

spatial planning and economic development policies are conducive to, encouraging and supportive of the above objectives;

- strategic infrastructure (including the local road system, services and and utilities) have the capacity to accommodate the development encompassed by these objectives;
- the potential of and the opportunities for this location fully appreciated and are widely advertised, including to key inward investors.

Response – The suggested changes to the wording of NUA/MU/1 set a greater emphasis on employment uses and removes the requirement for appropriate improvements to have been completed at the A1/A46/A17 junction prior to any employment development taking place. The additional area of land proposed for inclusion under NUA/MU/1 runs alongside the A46 and the additional emphasis on employment land is proposed in part as enabling development to help fund the operational requirements of the N&NASs ambitions set out in the draft Strategic Objectives. The area of land already sits with the NUA/SPA/1 area but would represent a large increase in the area of land available for employment development at a time when additional land is not required.

It is considered that it would be more appropriate for the masterplan for the Showground Policy Area to be further developed, on a partnership basis, with the existing NUA/MU/1 area remaining as existing. A significant area of the NUA/MU/1 land remains available for development and many of the complementary uses being proposed for the showground area can already be positively considered under the existing policy.

			<p>Development Plans are subject to regular review on a five year basis and any additional land could be considered for inclusion within future development plans where the level of take up with the existing area can be taken into account.</p> <p>The proposed amendments to the wording of policy NUA/SPA/1 could be included within the Options Report.</p>
47	Anglian Water	1	<p>No. Agree in part - Policy DM5 Design of the adopted Allocations and Development Management Policies DPD refers to development proposals proactively managing surface water through the use of Sustainable Drainage Systems (SuDs) which is fully supported.</p> <p>The revised NPPF published in February 2019 requires plans to take a proactive approach to mitigation and adapting to climate change including taking account the long term implications for water supply (para 149 of the NPPF). However the adopted Allocations and Development Management Policies DPD doesn't currently refer to water efficiency/re-use measures some of which can be complementary to managing surface water run-off from new development proposals.</p> <p>The Environment Agency considers that the area served by Anglian Water is an area of serious water stress as defined in the Environment Agency 2013 'Water stressed areas final classification report'. Anglian Water and the Environment Agency have also recently published an advice to local authorities setting out our support for the inclusion of the optional higher water efficiency standard where Anglian Water is the water company area.</p> <p>Therefore we would fully support the optional water efficiency standard being applied within the part of the Newark and Sherwood area where Anglian Water is the water company.</p> <p>Anglian Water as a water company is keen to encourage increased water efficiency/re-use as part of new residential developments. To support this we are offering financial incentives for residential developers that demonstrate that water use would be 100 litres/per person/per day at the point of connection. As outlined in our current Developer charges the fixed element of zonal charge for water supply would be waived where this can be demonstrated.</p> <p>We are also actively working with developers to install green water systems in new homes including rainwater/stormwater harvesting and water recycling systems. Further details of Anglian Water's approach to green water proposals are available to view at: https://www.anglianwater.co.uk/developers/green-water.aspx</p> <p>Therefore for the reason set above we would ask that Policy DM5 be amended to include reference to the optional higher water efficiency standard for residential development and increased water re-use including the measures but not limited to the measures identified above.</p> <p>Response-</p>

			Noted. The inclusion of the optional water efficiency standard within the part of the District falling within the Anglian Water area will be considered in detail as part of the review process.
48	Canal & River Trust	5	<p>The Trust has no comment to make with regards to whether the Open Break designations should be subject to detailed review. However, should they be reviewed, we do believe that consideration should be given towards the impact of development upon the River Trent corridor. The Open Break between Newark and Farndon straddles the River Trent corridor, and development here could significantly impact upon the river corridor. We therefore believe that consideration should be given towards the impact of any new allocations of policy designations upon the following:</p> <ul style="list-style-type: none"> - The impact on the character and appearance of the waterway corridor; - The impact on the biodiversity of the river corridor; - The impact on pollution towards the river corridor (e.g. from water runoff or construction activities). <p>We believe that any new development would need to be sensitively sited in order to ensure compliance with priorities set in the NPPF (e.g. paragraphs 127 and 170) concerning the impact on landscape character and the natural environment. This is especially pertinent given the role of the river corridor as part of the Strategic Green Infrastructure Network and the need for policy and decisions to accord with the aims of Core Policy 12 'Biodiversity and Green Infrastructure' from the adopted Core Strategy.</p> <p>Response – Noted.</p>
		8	<p>Green Infrastructure assets, including towpaths and riverside walkways, provide spaces for recreation in the District, and should be identified and included within the Green Space Strategy. We believe this is integral towards promoting sustainable transport (in line with the aims of Spatial Policy 7 from the adopted Core Strategy) and promoting leisure in line with the aims of Spatial Policy 8.</p> <p>Policy approaches to promote engagement and connections with the Green Infrastructure network, and for off-site contributions to ensure that walkways and pathways along the network are robust enough to promote public use should be considered to ensure that new and existing communities in proximity to the network can benefit from accessing these spaces.</p> <p>The Canal & River Trust look after and bring to life 2000 miles of canals & rivers, including parts of the River Trent corridor. Our waterways can be easily utilised by a wide section of the population. We believe that our network is uniquely placed to make a significant contribution to improving the wellbeing of those people living within easy reach of one of the free-to-use towpaths running alongside our canals and rivers. A report commissioned by the Trust 'Assessing the wellbeing impacts of waterways usage in England and Wales' written by social impact consultancy group Simetrica, reveals:</p> <ul style="list-style-type: none"> • The associated benefits of visiting a canal or river increase with the length of visit, with research showing higher levels of happiness and lower levels of anxiety for longer trips • Any visit to a waterway is associated with higher levels of life satisfaction and visiting regularly is associated with even higher levels of life satisfaction. <p>The Trust's research also reveals that three quarters of towpath users say that they visit to 'get away from it all and clear my head', and because they are 'great places to relax and de-stress' (Towpath Survey, 2017). Nationwide, whilst eight million people live within 1km of our</p>

			<p>network, only 3/10 ever visit (as calculated by the Trust's Waterway Engagement Monitor (WM) April 17 to March 18). As a result, any policy that promotes additional visits to our network has the potential to make a significant impact to the wellbeing of local populations. Whilst specialist sports facilities, can have a role to play in promoting wellbeing and physical activity, we believe that the green and blue infrastructure of the District, which extends into key urban areas, would be accessible to a wide range of people with a variety of physical ability. As a result, we strongly believe that a policy approach promoting the role of such strategic infrastructure has the potential to benefit a large proportion of residents in the District.</p> <p>Response – Noted.</p>
		9	<p>No. We believe that the Local Authority should provide detailed guidance and assistance for Local Communities in designating Local Green Space (LGS) within the Neighbourhood Plan Process.</p> <p>Whilst we do not object to the designation of Local Green Space areas, we do believe that the Local Authority should take an active role in liaising with Local Communities and Parish Councils to ensure that any new designations do not compromise the function and role of our waterway network.</p> <p>We have significant concerns that communities could designate operational waterways land as 'Local Green Space', including towpaths and land required by the Trust to undertake essential maintenance works to our waterways. This could have significant unintended consequences. Such a designation, under the provisions of paragraph 101 of the National Planning Policy Framework, would rule out all development on the towpath (except in very special circumstances) which could limit the ability for the Trust to undertake improvements to both maintain and enhance the local community's enjoyment of our network. This could include the provision of facilities to enhance the use of the waterway by boaters, improvements to the towpath for walkers, the provision of facilities for fishing, and changes to the use and operation of moorings that could be required to promote allow boaters and visitors to moor.</p> <p>Response – Noted.</p>
		10	<p>Yes. The utilisation of Building for Life 12 (BfL12) standards could make the Local Plan more effective in meeting the aims of section 12 'Achieving Well Designed Places' from the NPPF.</p> <p>BfL12 makes specific reference to the need for improving and integrating with existing connections; taking advantage of existing landscape features (including watercourses); and creating well defined spaces. Account of these requirements could significantly enhance the quality of new development in proximity to our waterways, which could help ensure that new communities benefit from easy access to our network and the wellbeing benefits this can offer.</p> <p>Response – Noted.</p>
49	Carter Jonas	2	Yes Response – Noted.
50	Coddington Parish Council	5	<p>No. The retention of the designated open break with its present boundaries is essential to the form and setting of the village, to ensure there is no coalescence of Coddington and Newark, more so now that pressure for development is even greater than when the designation was originally made. Damage has already been done to the traditional form of the village which makes retention of the open break in its present form essential. No re-assessment is required, rather commitment to the designation should be strengthened.</p>

			<p>In addition, the open break designation should be extended on the north side of Coddington to prevent encroachment of industrial development.</p> <p>Response – The Council believes that a review demonstrates its commitment to the policy and will provide an up-to-date evidence base to ensure that the policy can be robustly defended. The review will consider the need to extend the Open Break around the north of Coddington.</p>
51	Environment Agency	6	<p>Yes. The Environment Agency agree that a Tolney Lane Policy Area should be explored. This would be an ideal place to provide clear guidance on what future development would/wouldn't be acceptable in this area of high flood risk, along with confirmation of specific mitigation requirements that all future developments in this area will need to aspire to comply with. It has long been our opinion that only 'temporary' planning permissions should be considered within the current boundaries of this site, as a last resort, to allow for the potential future provision of an alternative site (in an area of lesser flood risk) where temporary occupants at Tolney Lane could ultimately be relocated. We are keen to continue working with your Authority, and other partners, on Tolney Lane issues and options.</p> <p>Response – Noted and the commitment to continued cooperation welcomed.</p>
52	JHWalter	5	<p>Yes. We believe that the Open Break designation is a useful method of preventing the coalescence of neighbouring settlements within Newark. However, we believe that a detailed review would be helpful in order to update N&SDC as to how the Open Break is currently functioning and how recent development has impacted upon the integrity of the Open Break.</p> <p>There is a parcel of land on Farndon Road, opposing the NCV Sales car & van dealership and adjacent the pumping station which has development to the north-west and south-west, but is included within the Open Break. We consider that areas like this should be excluded from the Open Break, where small-scale development is appropriate with the local area and would not have an adverse impact on the integrity and functionality of the Open Break. Development on this parcel of land would not lead to the coalescence of Farndon and Newark and would effectively 'round-off' the main built-up area of the settlement. We acknowledge that this area is partly within Flood Zone 3, but is also protected by its own dedicated flood bank. However, we believe that the material consideration of flood risk should remain separate from the designation process of determining whether land is or is not within the Open Break.</p> <p>It is noted that there are applications within the Farndon Open Break on Farndon Roundabout which potentially alter the integrity and functionality of the Open Break at this point. A review of the open break is welcomed in order for a detailed assessment of the current designations to be undertaken. Specifically, we would recommend that the review considers whether developments within these areas have altered the form and function of the areas of Open Break and whether scope should be provided through revised policy for small scale developments opportunities to come forward.</p> <p>Response – It is agreed that flood risk is not a reason for inclusion in the Open Break. A detailed review will be undertaken and any proposed changes to the boundaries will be in line with expert advice.</p>
53	Midlands Rural Housing	2	<p>Yes. 3.3 The Council has for a number of years successfully promoted 'Rural Affordable Expectations Sites' (comment 1) which support small scale affordable housing developments in villages for those wishing to live in their local community but where they cannot access affordable</p>

housing. These are an exception to normal policy and can be cross subsidised by limited development of market housing. The new category of 'entry-level exceptions sites' is included in the NPPF which is similar to 'rural affordable expectations sites' (comment 2) but is restricted to providing affordable housing suitable for first time buyers (or those looking to rent their first home). Entry-level exception sites should not be larger than one hectare in size or exceed 5% of the size of the existing settlement nor be in the Green Belt. They should be located adjacent to existing settlements. It is proposed that in order to address these policy changes that an approach to is developed for inclusion in the new affordable housing policy as part of the next stage of the Plan Review (comment 3).

Comment 1 - Comment 1 - 'Rural Affordable Expectations sites' - please note the spelling error as it should be 'Rural Affordable Exception sites' and to be even more accurate should it not be just 'Rural Exception Sites' removing reference to affordable as they are not usually referred to with the word affordable in the title. It also could lead to confusion with the N&SDC policy that allows for cross subsidy?

Comment 2 – MRH would dispute that the new category of 'entry level exception site is in fact 'similar' to rural Exception sites (spelling error as above) as 'entry level exception sites' are not in fact RURAL. The only similarity is that they are designed to deliver affordable homes but the type of affordable home is not suited in the main to rural locations due to the limited tenures available and the numbers involved.

In the 2018 NPPF;

1. Section 71 (referenced below) falls under the section in the NPPF 'identifying land for homes' it DOES NOT fall under the section RURAL HOUSING.

2. The first point in the rural housing section 77. Says ' In rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs.'

This would suggest that rural policies and local needs requirements would override an application for an entry level exception site in a rural area that is not supported by the evidenced need shown through a HNS (points 4.5 and 4.6 in the N&SDC Affordable housing SPD).

MRH support the suggestion that 'entry level exception sites' are not designed for rural areas they are designed for urban areas. Rural campaigners fought hard for the entry level sites NOT to be extended to include rural entry level exception sites for this very reason so that LA rural policy still TRUMPS them (Core policy 2 N&SDC Aff. Housing SPD).

Comment 3 – Entry-level exceptions site policy should be clarified in N&SDC's new affordable housing policy but a clear distinction should be made between the plan reviews rural development policies which include Rural exception sites and their other planning policies which include 'entry level exception sites'.

Response –

Comment 1 – spelling mistake noted – it is not the intention of the Council to amend the rural affordable housing policy.

			<p>Comment 2 – noted the similarity that the Council was aiming to highlight was that both types of developments are exceptions to normal policy constraints. The Council is sympathetic to the concern expressed regarding the potential impact that entry level exception sites could have on rural exceptions sites.</p> <p>Comment 3 – Agreed the different policy exceptions should be properly identified.</p>
54	NCC Public Health	1, 12	No. Response – Noted.
		2, 3, 4, 5, 11	Yes. Response – Noted.
		6	<p>Yes. Consider the recommendations outlined in Gypsy and Traveller health: accommodation and living environment Independent Report 2016 as part of the exploration of the Tolney Lane Policy Area</p> <p>https://www.gov.uk/government/publications/gypsy-and-traveller-health-accommodation-and-living-environment</p> <p>Response- Noted. The contents of the report are noted – particularly with respect to how living conditions contribute towards physical and mental health, and the poor health of Gypsies and Travellers being made worse by their living environment, accommodation insecurity and community discrimination. Through the review a detailed strategy to meet the future accommodation needs of gypsy and traveller communities will be produced.</p>
		7	<p>As stated previously in Question 6</p> <p>Response- Noted. See response above.</p>
		8	<p>The Council may find the following useful to contribute to the implementation of the new strategy , Sport England Active Design:</p> <p>https://www.sportengland.org/facilities-and-planning/active-design/</p> <p>In addition previous evidence provided by Public Health and Landscape Institute covered by 5 principles</p> <p>https://landscapewpstorage01.blob.core.windows.net/www-landscapeinstitute-org/migrated-legacy/PublicHealthandLandscape_CreatingHealthyPlaces_FINAL.pdf</p> <p>Response – Noted.</p>
		9	<p>Yes. Consideration that Public Health be given the earliest opportunity in the Neighbourhood Planning stages to provide advice and evidence for the designation of Local Green Space.</p> <p>Response – Noted.</p>
10	<p>Yes. Supportive of the inclusion of the Building for Life Standards if use in conjunction with the Nottinghamshire Spatial Planning And Health Framework 2019-2022 where it sets out the use of Nottinghamshire Rapid Health Impact assessment Matrix- Checklist for Planning and Health. https://www.nottinghamshire.gov.uk/planning-and-environment/planning-and-health-framework</p> <p>Response – Noted the Council will consider how to include the provisions of the Framework within amended policy.</p>		

55	Notts Wildlife Trust	5	<p>No. 'Open Breaks' should be retained because they protect open areas, important as green spaces in their own right and link urban wildlife sites with the open countryside. They also restrict the spread of urban areas into the surrounding countryside. The areas should be brought under positive management to enhance their wildlife and recreational value.</p> <p>Response –The review will acknowledge situations were openness related to a nature conservation site but Open Breaks purpose is to prevent coalescence. Nature Conservation implications will be addressed through other policies.</p>
		6	<p>Yes. The River Trent and its tributaries are important features of the District; there needs to be sustainable development and management of river corridors. In the Issues Report there is no mention of development in the floodplain. Floodplains act as a natural, sustainable flood defence as well as being important for wildlife. Present forecasts predict that flooding will be getting worse and as the risk of flooding is a material planning consideration there is a need to remove unsustainable housing allocations. There should also be no further development in the functional floodplain.</p> <p>The restoration of significant areas of functioning floodplain to achieve large-scale restoration of priority wetland Biodiversity Action Plan habitats, including lowland wet grassland/floodplain grazing marsh, reedbed, wet woodland and fen, which can be used for water storage in areas susceptible to flooding that provides linkages to other areas of nature conservation value is an important part of the strategy to cope with increased rainfall.</p> <p>Response –</p> <p>Noted. The review is supported by an updated Strategic Flood Risk Assessment – it's findings will inform the review of existing site allocations with respect to where there has been changes in flood risk, with amendments having been proposed where necessary. With specific regard to Tolney Lane the area is at know flood risk and the Tolney Lane Flood Alleviation Study has been prepared, which provides a good understanding of the nature of risk in the area and potential options for its alleviation. This work will be an important element in guiding consideration of the role, if any, Tolney Lane will play in meeting the future accommodation needs of gypsy and traveller communities.</p>
		8	<p>Studies have shown that a natural environment rich in biodiversity helps local communities by delivering social benefits (eg., improved physical and mental health through wildlife related work, leisure and recreation; social inclusion through volunteering; education and lifelong learning opportunities; skills training for employment; and pride in local places) and economic benefits (eg., employment, tourism and cost-effective natural system flood relief)(English Nature, RSPB and The Wildlife Trusts (undated) 'Natural Communities'). Biodiversity and sustainable development</p> <p>It may seem an unconventional and negative step to preclude areas from development by identifying them for sustainable landscapes and biodiversity. However, biodiversity objectives can deliver economic benefits to communities by creating employment through new projects, re-creating cost-effective ecosystem functions such as flood relief, enhancing the local economy through tourism and improving local surroundings.</p> <p>Response – Noted the district council seeks to secure additional open space, including areas of biodiversity as part of new development.</p>
		9, 11	<p>Yes. Response – Noted.</p>

		10	<p>Yes. The built environment of the District’s towns and villages is also important for biodiversity because several species have adapted to use man-made buildings as breeding or roost sites. Examples are species of bats (pipistrelle, whiskered, Brandt’s and brown long-eared bats) and birds (swifts, house martin, starling and house sparrow). All bats are Biodiversity Action Plan Priority species; starling and house sparrow are Red List Birds of Conservation Concern; swift is an Amber Species of Conservation Concern. All the bat and bird species can be adversely affected by development of existing buildings and modern building techniques frequently exclude them. There is an opportunity for innovative development design that can incorporate space for wildlife (see London Swifts) and the Local Plan should take a proactive role in encouraging such designs.</p> <p>Response – Noted.</p>
		12	<p>Yes. NAP 2B - this site appears to be adjacent to Beacon Hill Local Wildlife Site (LWS 2/643). Protection of the LWS should be ensured through the planning system.</p> <p>NUA/Ho/10 & OS3 - both of these sites are in close proximity three LWS and so we are concerned about potential impacts: Balderton Works Meadow (1) 2/804; Balderton Works Meadow (2) 5/2129; Lowfield Lane Grasslands 2/803.</p> <p>NAP 2A - this site is adjacent to River Devon (North of Cotham) LWS 2/588. The river will require buffering during and post development.</p> <p>OB/MU/1 - the site is adjacent to the River Maun. The river will need to be appropriately buffered.</p> <p>CL/MU/1 - a Preliminary Ecological Appraisal will be required in order to understand any ecological constraints the site presents. The possible presence of barn owl and peregrine falcon both Schedule 1 species will need to be fully assessed.</p> <p>Ra/E/1 - the site is adjacent to Rainworth Water Piece LWS 2/701.</p> <p>Response – Noted. This will be considered as part the determination of any future planning applications.</p>
56	John Bradbury	2	<p>Yes. Rural affordable exception sites should be allowed on green belt land adjacent to existing properties.</p> <p>Response – Rural affordable exception sites are allowed adjacent to a number of green belt settlements. It is not intended to widen this within the review of the Allocations & Development Management.</p>
		3,4,10,11	<p>Yes. Response – Noted.</p>
		6	<p>Yes. More traveler sites need allocating throughout the district.</p> <p>Response-</p> <p>Noted. Through the review a detailed strategy to meet the future accommodation needs of gypsy and traveller communities will be produced.</p>

		7	<p>Planning permission should be much easier if traveler pitches are developed on previous developed land this should include agriculture farm yards</p> <p>Response- Noted. All gypsy and traveller planning applications will be considered on their merits applying Core Policy 4 and 5 in the Amended Core Strategy, other relevant policy content within the Development Plan and national planning policy.</p>
		8	<p>Create new footpaths so circular walks can be made without having to move your vehicle.</p> <p>Response – Noted.</p>
		9	<p>No. The green belt should be determined by NSDC planners. Development in the green belt should be allowed if near or adjacent settlements, the area developed can be offset by gifting an equivalent area to the district for public enjoyment and or environmental enhancement.</p> <p>Response – Noted Local Green Space is not Green Belt.</p>
		12	<p>Yes. Bl/ho/1 on Dale Lane Blidworth has been allocated for donkeys years. The land owner is not interested in development for the good of Blidworth residents only for his own financial gain. Anyone else would have developed the site and been grateful with whatever the financial gain. This site should be de allocated and negotiate with a land owner who has land nearer to the village centre and whom is willing to push through development to the benefit of Blidworth residents, Nsdc social housing before his own financial gain.</p> <p>Response – The local planning authority is satisfied that allocation Bl/Ho/1 remains deliverable.</p>
		13	<p>No. Response – Noted.</p>
		14	<p>The green belt around Blidworth needs a review, there is significant land available, close to the doctors, post office , leisure centre, convenience store, that could be developed to meet the 100 plus house, plus supply land for social housing at a low cost and benefit everyone.</p> <p>Response - The Green Belt review was undertaken as part of the production of the Allocations & Development Management DPD process and it was intended to be a one off and not a continual approach which would be revisited at every review of the Development Plan as set out in Paragraph 136 of the NPPF.</p>
57	The Woodland Trust	1	<p>Yes. In particular the plan should reflect the significantly strengthened protection for ancient woodland and veteran trees given by the new NPPF and in particular that any development that is allowed to damage these assets should be "wholly exceptional" (para 175c of the NPPF).</p> <p>Response – It is proposed to include such references in updated policy.</p>
		8	<p>We would like to see a comprehensive and well linked network of multifunctional open space in the District. This should include natural greenspace, including trees and woodland. We would like to see existing natural greenspace and woodland protected and opportunities sought for creation of new greenspace and woodland, particularly as part of new development. You may wish to include in your local plan or open space strategy reference to either the Natural England Access to Natural Greenspace Standard (ANGST) or the Woodland Trust's Access to Woodland Standard.</p> <p>Response – Noted.</p>

		12	Yes. We are concerned that several of the allocations near Edwinstowe are within close proximity to an internationally significant ancient woodland/SSSI/SAC/NNR. We would welcome an opportunity to discuss with your officers the likely impacts of development on these habitats and how they might be avoided or mitigated. Response – Noted. The District Council will work with stakeholders and interested parties to address these issues.
58	Theatres Trust	1, 4	Yes Response – Noted.
		14	We would recommend that design policies within the future plan reference the Agent of Change principle following its introduction into the NPPF (paragraph 182). This will help protect the activities of valued cultural facilities in the area from conflict arising from new development. Response – Noted.
59	Staunton Parish Meeting		No Comments