



**NEWARK &
SHERWOOD**
DISTRICT COUNCIL

**NEWARK & SHERWOOD LOCAL DEVELOPMENT
FRAMEWORK**

Plan Review

Issues Paper Statement of Consultation

1.0 Newark & Sherwood Local Development Framework Plan Review Issues Paper Consultation

- 1.1 The two key planning policy documents that make up the Development Plan in Newark & Sherwood District are the Core Strategy and the Allocations & Development Management Development Plan Documents (DPDs). The Inspector who examined the Allocations & Development Management DPD concluded that because the Plan had been prepared during the recession, an early review should be conducted to test if the market had recovered enough to continue to deliver the various elements of the plan. The District Council is therefore in 2015 and 2016 undertaking the Newark & Sherwood Local Development Framework Plan Review.
- 1.2 The Issues Paper Consultation was the first consultation stage of the Plan Review. The Issues Paper sets out the scope of the Review, the issues we have identified as important and potential approaches to addressing them. Public consultation took place between 5th October and 16th November 2015. 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 documents were placed in all District libraries and five consultation events were held.
- 1.3 A total of 73 Issues Paper Consultation responses were received. In section 2 of this document, each of the 21 questions is set out and a summary of responses received is provided.

2.0 Consultation responses summary

2.1 Each of the questions in the Issues Paper is set out below. Responses are summarised, with some responses reproduced in full. Additional comments submitted are also summarised. The consultation responses summary does not include the personal details of private individuals.

Question 1: Do you agree with the Council's approach to reviewing the various elements of the development plan and integrating Gypsy and Traveller elements into the wider Plan Review?

Of the thirty-four responses received, twenty-six were in agreement with the Council's approach and a further two were partially in agreement.

Persimmon homes supported the way that the Council was carrying out the Local Plan Review also commented: 'Stage 4 sets out that the Council will submit amendments to existing policies to the Planning Inspectorate and that Stage 5 consolidates the outputs of the examination into a single local plan. While this is supported in principle, Persimmon Homes seeks clarification that the consolidated plan is that which is submitted to the inspectorate for examination, as a comprehensive document, so that the Plan can be examined as a whole.'

One resident expressed little confidence that any attention will be paid to comments received during the consultation. A local landowner's agent wanted the Plan review to include a Green Belt review. An agent for a developer suggested that land be released from the Green Belt for housing and that village envelopes should be reviewed. The Homes & Communities Agency emphasised the importance of complying with the Duty to Co-Operate and suggested that the Plan Review 'address the wider local context, including the Local Enterprise Partnership priorities and Growth Plans'.

The East Notts Travellers Association did not agree with the Council's approach, writing: 'No because Gypsies and Travellers will typically form only a very small percentage of the population in any given area. The total population is estimated to be about 0.6% of the total UK population, of which only a proportion are living in, or seeking, caravan site accommodation. This means that the Strategic Housing Market Assessment is unlikely to yield results that are statistically robust for Gypsies and Travellers as a separate group.'

Cultural differences, a reluctance of some members of these communities to identify themselves as Gypsies or Travellers, or a disinclination to participate in a process with which they are not familiar, mean that the main Strategic Housing Market Assessment process is likely to be markedly less successful in accessing this group than others. In addition, the particular lifestyle and culture of Gypsies and Travellers may give rise to distinctive accommodation needs, which the main assessment will be unlikely to pick up.'

The National Trust agreed that the Council was carrying out the Local Plan Review in an appropriate way. While Southwell Town Council agreed with integrating Gypsy and Traveller elements into the wider Plan Review, they also made criticisms: 'The reduction in the number of houses to be allocated in the

District represents a fundamental change to the DPD. Therefore we disagree with the general approach which should be bottom up rather than top down. The Council need to engage with the communities before the amendments are drafted, not consult after decisions have been made. How are the emerging Neighbourhood plans to be incorporated? How are our aspirations after 2026 to be considered?’

Detailed comments were received from Hollins Strategic Land (HSL):

‘Whilst we welcome the intention to undertake a Plan Review, HSL have a number of concerns in respect of the intended approach, which are set out in greater detail in our response to the subsequent questions. We also note that certain assumptions already appear to have been made in respect of the findings of the Plan Review, which brings into question the robustness of the review process and the fundamental purpose of carrying out consultation exercises.

More detail must be provided with regards to how the Council are intending to ‘review the deliverability of the Allocations’, under the first stage of the proposed approach. Rather than simply consider whether development sites are physically deliverable, it will be important to take a view of the local housing market and be realistic about whether there is actually capacity in the market to deliver the anticipated number of dwellings proposed within the timeframe of the Local Plan. Further commentary on this matter is set out in our response to Question 8.

No indications are provided in respect of timescales within this document (which we think would have been helpful) but following a review of the updated LDS (September 2015) our view is that the intention to submit the revised/consolidated Plan to the Secretary of State in July 2016 following two further stages of consultation (Preferred Approach January/March 2016 and Draft DPD May/June 2016) is ambitious. This does not allow sufficient time to respond to points raised at each stage of the consultation process and carry out (or instruct) additional work where necessary and brings into question whether this is a thorough review.

We welcome the intention set out at paragraph 2.7 of the Issues Paper to prepare a composite Local Plan document to ensure revised policies plus those carried forward are set out in one place.’

Question 2: Do you agree that the Plan Period should be 2013 to 2033 to reflect the latest evidence or do you think other dates would be more appropriate?

Twenty-four of the thirty-eight responses received were in agreement and nine disagreed. Many people, including some opposed to the proposed Plan Period, were in favour of early review. Newark Town Council commented: ‘given the time frame of this new plan period and the fact that the current plan is relatively new there should be an opportunity to carry out a further interim review within the the 20 year period.’

South Muskham and Little Carlton Parish Council wrote: ‘2033 is too far off and therefore unpredictable. A safer compromise would be 2030 as it is noted

that the provision for gypsy/traveller pitches extends to 2028.' Ollerton & Boughton Town Council argued for a ten year Plan Period, from 2013 to 2023. Similar ideas were put forward by Fernwood Parish Council who thought that a twenty year Plan Period was too long to deal with changing circumstances and also suggested a ten year period from 2013 to 2023.'

Norwell Parish Council similarly felt that a twenty year period was too long given the likely extent of demographic and economic change over such a long time and commented further: 'Such duration requires:

1. Scheduled interim reviews with consultation (five yearly) and
2. On-going review to ensure fitness for purpose with formal consultation on change identified as necessary to meet the district's evolving needs'.

A local resident wrote that: 'a twenty year plan is far too long to be meaningful in a rapidly changing society. Parts of the existing plan are not fit for purpose less than 5 years after they were agreed.' A planning consultant agreed with the Council and argued: 'a time horizon of 2033 would allow for plan period of at least 15 years post-adoption; would reflect the time period used in Housing Market Area (HMA) assessment of Objectively Assessed Need; and would be consistent with the time periods planned for in other HMA authorities.'

Question 3: Do you agree that the Settlement Hierarchy should identify villages below Principal Villages so that they can accommodate limited development?

With regards to local representatives' support for the proposed approach was provided from County Councillor John Peck member for Rufford ward, Blidworth, Caunton, Coddington, Collingham, Norwell, Rufford and South Muskham & Little Carlton Parish Councils as well as Ollerton & Boughton, Newark and Southwell Town Councils. Objections to the proposed approach were received from Averham, Kelham and Staythorpe, Fernwood, Upton and Wellow Parish Councils.

Through their response Caunton PC set out detailed comments arguing for greater flexibility in relation to villages currently considered as 'unsustainable', citing concerns that the sustainability of small villages is stifled through preventing the change necessary to meet evolving needs. It is argued that there ought to be provision for limited development within the historic envelope of villages. The Parish Council considers that the criteria used to determine such proposals should be defined at the point at which an application is submitted rather than in advance. Whilst Coddington PC provided support for a village envelope in principle, in order to avoid ambiguity, the body nonetheless sets out that the criteria in SP3 should still apply within this boundary. The question over whether Parish Councils would define the envelope prior to publication of the Draft Plan is raised. Collingham PC also supported the proposed approach highlighting the shortage of smaller properties and affordable housing for younger and older residents in villages. The response from Norwell PC mirrored that of Caunton. South Muskham PC provided support for limited housing development to meet local needs only and to prevent overpricing. The Parish support the relaxation of the village envelope to cater for this along with the review of flood risk restrictions.

Southwell Town Council supported the approach on the basis that it will allow new households to stay in their village and maintain the sustainability of the settlement. The Council does however consider that it should be down to individual villages to determine the extent of development. The Town Council also suggests the identification and development of new villages. Newark Town Council wrote that: 'given the large number of parish councils that exist within the district it is suggested that any such small scale developments should be ignored from the assessment of the delivery of the overall housing target. In addition it is also suggested that this facility is also open to the larger town/parish councils.'

In terms of the objections from local representatives Fernwood PC highlighted issues around the transferring of land to the Parish Council from private landowners and third party management companies. Accordingly the Parish Council considers that Balderton/Fernwood should be identified as a village below the principal village level which can accommodate limited development. Whilst Upton Parish Council set out that the status quo, as defined through SP3, should be maintained.

Residents were mainly supportive of the proposed approach with comments pointing to a desire to see development shared out, the existence of villages which can absorb development without losing their character, the need for the identification of 'secondary villages', fears over villages being doomed to atrophy, the lack of the need for a settlement hierarchy at all and the preference for development taking place in all towns, village and settlements. The single objection from a resident highlighted concerns over the need to protect smaller villages from potentially unsuitable development

The response from Anglian Water detailed that should further villages be identified as a focus for growth then there will be a need to consider the implications for existing wastewater infrastructure within the company's area of responsibility. The Canal & River Trust indicated support for the proposed approach. The Homes & Communities Agency also support the approach, as did Midland Rural Housing. Nottinghamshire County Council responded positively but indicated that any planned development in these areas needs to be commensurate with the scale of the settlement and link in with overall plans. Southwell Civic Society also provided support.

The responses from planning agents and the development industry were as follows. Jackson Design objected to any change, setting out that the existing settlement hierarchy is sensible and directs development to sustainable locations. Fisher German provided support for the existing settlement hierarchy and considered it appropriate to maintain. Nexus Planning on behalf of Hollins Strategic Land believe the existing Settlement Hierarchy to be appropriate and that the focus for development should still be the Newark Urban Area, Service Centres and Principal Villages.

Mike Sibthorp Planning support the identification of villages below principal village level in order to accommodate limited development. The NPPF is deemed to make clear that all settlements are capable of accommodating some growth. Accordingly a blanket restriction of housing development in some settlements should be avoided unless supported by robust evidence. The needs based approach of SP3 has not addressed development needs in rural settlements and is inconsistent with national policy. The response does however set out that there is no need to identify a further tier of settlements – one policy should reasonably permit an appropriate level of development in rural settlements. It is considered that assessments of sustainability should be more

broad-based than accessibility and transport. The sustainability test should consider the extent to which new development can contribute to the future sustainability of an area. Any new policy should not be contingent on Neighbourhood Plan preparation.

Gladman indicate that the District will have a number of distinct housing market areas each with its own requirements which should be reflected in the spatial distribution of housing supply. If this distribution does not reflect the need/demand identified through the evidence base then the Plan will be undeliverable. It is set out that a dispersed pattern across a large number of settlements is undesirable, unlikely to be sustainable, be questionable in terms of its sustainability and unable to generate the level of community benefit which larger sites can.

Ian Baseley Associates point to a lack of clarity in interpretation and an inconsistency in decision making around Spatial Policy 3. Particular attention is drawn to the need criterion, whilst affordable housing is widely accepted to comprise an identified proven local need the response sets out that it cannot have been the intention to restrict new housing development in relevant locations to purely affordable housing. Accordingly it is advised that SP3 be positively reworded to address concerns and appropriately clarify the circumstances in which, and what type of, new housing will be permitted in rural settlements. The identification of villages below Principal Village level is supported.

Rippon Homes would support the identification of villages below the principal village level of the Settlement Hierarchy, and also consider that a minimum provision, as a percentage, should be identified across the tier, rather than by individual settlement. Town-Planning.co.uk responded positively and indicated that there are a number of villages below Principal Village level which have a limited range of services and facilities that could accommodate a modest level of housing growth – particularly self-build and/or development by small local builders. The current focus on large sites is too reliant on a small number of national housebuilders and SP3 has resulted in locally supported small scale housing proposals being refused purely on lack of local need.

Those made on behalf of local landowners included the response from Chave Planning – which put forward that the Development Plan is unhelpful through not identifying villages beyond the Principal Village level. The reliance on the SP3 guidance note is criticised as an inappropriate basis for decision making. Concerns are also highlighted that local housing needs are not being met and so it is set out as important that the plan review provide the basis for allowing an appropriate level of development to come forward in villages, and also to set out the circumstances where new development would be viewed favourably within and outside the main built up area. Copesticks Ltd agree with the proposed approach and indicate that limiting development to main built up areas is inconsistent with the Governments rural growth agenda.

Question 4: What considerations do you believe should be included in any criteria to select such villages?

With regards to local representatives Averham, Kelham and Staythorpe Parish Council set out that villages should have sufficient infrastructure and amenities (i.e. shop, school transport and community facilities). Blidworth PC identifies affordable and social housing and a level of ‘social services’ as necessary characteristics. Caunton PC consider that the approach should reflect local needs as a result of age, family size, employment and the existence of split families. Coddington PC identify as satisfied with the considerations set out in SP3 but would welcome clearer guidance on ‘housing need’. Collingham

PC believes that the relevant Parish Council or Meeting should show local need. Fernwood PC believe ownership of land to be of primary concern given the District Councils desire to facilitate the purchase of land by developers and private management companies. In addition the Parish list impacts on; the amenity of existing residential areas, local facilities and resources, the environment (lack of sanitary and refuse infrastructure), water, gas and electrical utility infrastructure, access to other facilities where the settlement doesn't possess its own and the size of population growth over a ten year period as needing to be taken account of. Norwell PC's comments mirrored those of Caunton. Ollerton & Boughton Town Council set out that in addition to the existing criteria in Spatial Policy 3 consideration should always be given to low cost affordable homes. Rufford Parish Council believes that each Parish must have a Neighbourhood Plan approved by referendum. South Muskham & Little Carlton PC detail that consideration needs to be given to the need for homes for young couples and the elderly who want to downsize. Southwell Town Council pinpointed engagement with the local community, demonstration of need with an emphasis on affordable housing, re-use of brownfield land and infill to strengthen streetscapes as critical factors. Finally Wellow Parish identified the need for development to be in proportion with the existing village.

Responses from local residents highlighted 'location', the existing use of the land, derelict/disused buildings, the benefits to the village, site specific considerations, access to services, site access, availability of affordable housing, existence of services and facilities (i.e. school, pub and shop), the desire of the Parish Council to see development, the need for justifiable criteria and limiting development to the existing main built up area as important considerations.

Anglian Water refer to the need to consider the implications for the exiting wastewater infrastructure in the company's area of responsibility. The Campaign to Protect Rural England identify; the support of local communities, the need for robust local housing need surveys, the consultation and acceptance of criteria by key stakeholders (including the community and the CPRE), assessment of environmental capacity, securing affordable housing, provision of green infrastructure, the potential for sustainable transport options and appropriate design guidelines as needing to be addressed. Midlands Rural Housing suggest the number of households, population size, presence of existing facilities and services and the location/proximity to a Principal Village or Service Centre as factors to be taken account of. Nottinghamshire County Council emphasise the importance of additional housing not having a detrimental impact on the character of the location or landscape setting. The introduction of factors which indicate an enhancement of the sustainability of the settlement would be supported by the body. Nottinghamshire Wildlife Trust suggests the inclusion of references to wildlife and habitats. This should include clear reference to avoiding damage to Local Wildlife Sites (LWS) rather than measures to mitigate. It is put forward by the body that development should reflect and enhance the character and appearance of the local natural environment and be positive for biodiversity through design, use of material, layout and landscaping. Where damage or complete loss is permitted then the aim should be to ensure that there is a net gain of biodiversity of at least a 2:1 ratio. Southwell Civic Society consider that the demonstration of need, priority for affordable housing, a sequential approach balanced towards brownfield land, a restriction on backland development and support for infill development where this strengthens the streetscape should all be included as considerations.

In terms of planning agents and the development industry the response from Gladman detailed that development in lower order sustainable settlements would be supported where this helps to sustain existing facilities and services. The level of growth should be based on their ability to accommodate sustainable development, and viewed in the context of providing sufficient housing to meet the Authority's housing needs. Each of the District's settlements,

large and small, will have development needs that should be met. IBA Planning suggest the inclusion of criteria concerning; the existence of local services and facilities (where new housing will enhance or maintain vitality), the existence of, or potential to improve, public transport, the role the settlement plays in supporting services in a village nearby, the existence of previously-developed (and windfall) sites which would be eminently suitable for housing, the existence of redundant agricultural premises/farmsteads where their redevelopment will result in a visual or environmental enhancement, the existence of suitable conversions, rounding-off or infill opportunities and where market housing is required to deliver affordable housing needs.

Jackson Design consider that only where there is a clearly identified local need should housing be allowed in non-Principal villages and that smaller villages should not have specific numbers attributed to them. The consultee believes that where housing numbers have been set these are a minima and it would confuse the clear mandate to direct development to sustainable communities to depart from this. Higher order settlements have already established the capacity and infrastructure to accommodate new housing, provided for a sustainable pattern of development with surplus available sites to deliver any future increased need without the need to reclassify smaller villages. Rippon Homes believe the considerations listed at Paragraph 3.6 to be appropriate. Through their response Town-Planning.co.uk set out that any new policy should take into account existing services and facilities together with public transport corridor availability. The services and facilities deemed necessary could include a Primary School, village hall, shop and public house. The approach of Bassetlaw in Policy CS8 of their Core Strategy is referenced.

Responses made on behalf of local landowners include that from Chave Planning which details the selection of villages should be informed by carrying out a sustainability appraisal of them and an understanding of local housing needs. Though where villages have only limited facilities the response advises against ruling out housing development – some development is needed in order to support these amenities and maintain village life. Copesticks Ltd suggest a bus stop on route to a higher order settlement and a basic convenience store. In addition to their agent in this case the landowner has also made suggestions which include the number of local employers, the number of people employed within a village, access to good transport links and local demand for housing. Mike Sibthorp Planning citing relevant provisions of the NPPF and NPPG argue for the removal of the needs based test within SP3. Whilst some form of ‘sustainability test’ is supported this should be broad and not confined to accessibility and service considerations. The criteria must include consideration of how a development may contribute to the future improved sustainability of a locale.

Question 5: Do you have any suggestions as to which villages the council may include?

Barnby-in-the-Willows Parish Council would welcome the opportunity to re-define a village envelope for the village. The Parish also states that issues around public transport, infrastructure, traffic management and good broadband connections will need to be addressed. Collingham Parish Council set out the settlements should nominate themselves, but that there needs to be consideration given to the implications for Principal Villages and highways as part of this. Fernwood Parish Council believes that villages where there are the resources and infrastructure to accommodate development should be included. Norwell Parish Council responded stating that a pre-determined list is undesirable as it would be too inflexible over time. Rufford Parish Council put their area forward with a desire to see the former village envelope boundary reinstated. South Muskham & Little Carlton Parish Council also put their Parish forward. Wellow Parish however would not support the identification of their Parish. Ollerton & Boughton Town Council hold the view that all villages should

be considered.

Responses from local residents have identified; Coddington, Clipstone, Walesby and Winthorpe. In terms of detailed comments one resident suggests that the current division between the 12 settlements as locations for growth and the rest results in 'all kinds of injustice and anomalies'. Further residents have suggested any village where proposed development would have demonstrably positive impact. Concerns over development being allowed to overspill into the countryside were also raised.

Through their response Midlands Rural Housing identified Caunton, Elston, Farndon, North Muskham, Norwell and Thurgarton. Rippon Homes suggested Caythorpe.

Planning agents acting on behalf of local landowners include – Chave Planning who in identifying Edingley pointed to its sustainability credentials (public house and village hall) and the need for further development to sustain those facilities. The close relationship to Farnsfield and Southwell where there are higher order services and facilities was also emphasised. The housing needs of the village need to be closely considered with the Census pointing to significant under-occupation of dwellings compared against the remainder of the District and the wider Region. This could be reflect in a pent-up desire to down-size which if resolved could in turn free up family homes.

Mike Sibthorp Planning suggest that, in light of their response to questions 3 and 4, any rural housing policy ought to apply equally to all settlements below Principal Village level. The respondent's specific interest is however focused on Caunton which has some services and facilities and the scope through further development for these to be enhanced along with the overall sustainability of the village. Should the approach be to specifically identify villages then the response puts forward Caunton.

IBA Planning identify Norwell and in doing so references the dissatisfaction of the Parish Council with SP3 and the support for small-scale housing development to support its school and range of local services and facilities. Thurgarton is also put forward with the recent loss of one of its two pubs being pointed to. If the remaining pub is to survive then the response suggests that the village be identified as a settlement suitable for a limited amount of future housing. Support provided by the Parish Councils for developments refused at Bleasby/Goverton, Caunton, Edingley, Halam and Rolleston were also pointed to.

Town-Planning.co.uk consider than the 'large villages' formerly defined in the Local Plan may provide a starting point, although an up-to-date services and facilities study would be required. Through the SHLAA Methodology Bleasby, Coddington, Elston, Fiskerton-cum-Morton, Gunthorpe, Halam, Harby, North Muskham, Norwell, Walesby and Winthorpe were identified.

In addition landowners acting without representation put forward Fiskerton-cum-Morton, where the need for small-scale development was identified, and Rainworth.

Question 6: Do you agree with the District Council's assessment that the Objectively Assessed Need is the appropriate figure to become the District housing target?

There was a mixed response to this question with Parish Councils and other individuals being generally supportive and the development industry not agreeing.

A number of responses were received which expressed support and made no further comments including Norwell, Rufford and Wellow Parish Councils and Ollerton & Boughton Town Council. Blidworth Parish Council agreed subject to suitable infrastructure being in place. Collingham Parish Council notes that if the figure is a ceiling then we agree, if it is a floor it is just a starting point. South Muskham and Little Carlton Parish Council state yes - as calculated using current guidance criteria, but on the ground future considerations restricting housing development have to be employment opportunities and road congestion difficulties which could stifle employment growth.

Fernwood Parish Council however do not agree and comment that with a serious lack of infrastructure investment within the N&SDC area the number of over 9000 dwellings in the next 20 years is far too high. The assessment in no way identifies home ownership in the form of leasehold and freehold and as such would have an impact of future land usage. But the central government will however likely override local considerations.

Newark Town Council commented: 'the significant reduction in the housing target could have a major financial impact on the Town Council; the affordability of the recently approved devolution agreement is largely predicated on the delivery of significant new houses being built in the two growth point sites on land south & east of Newark. A reduction in the number of houses built on these two sites over the next 20 years could result in the Town Council not being able to afford the cost of the services which were transferred in April 2015. The Town Council would strongly urge therefore that these two sites remain strategic new housing allocations and are recognised within the new plan as being the first priority for development. In addition any reduction in the number of new houses to be built in Newark from the planned level would also have a financial impact on the District Council; under the devolved services agreement the non-achievement of new house numbers will result in additional grant being paid to the Town Council until such point as the houses numbers are delivered.'

Southwell Town Council don't agree that Ashfield, Mansfield and N&S is a single housing market – there are very different characteristics. This approach does not tie up with the previous Housing Needs Analysis of 2014 which identified Southwell as a sub-area. The 2013-33 period mentions 9080 dwellings in total but how many have already been completed?

Southwell Civic Society also do not accept that Mansfield and Ashfield are in the same housing market area as Newark and Sherwood just because they are adjacent Authorities. Newark and Sherwood is principally a rural area and its lines of communication are with Nottingham to the South West and Lincolnshire to the north, south and east. Newark has strong links for employment with London. The do not think that the relationship between the previous

plan period 2006 to 2026 and the current plan from 2013 to 2033 is fully explained. What will be the effect of completions and allocations since 2013 on the number of new dwellings to be allocated? The planned 14,800 dwellings quoted for the 2006 to 2026 Plan was reduced to a requirement for new allocations of 10,614 dwellings from 2009 to 2026 after completions and commitments up to 2009 were taken into account.

Highways England acknowledges that reduced housing and employment targets are proposed and would expect this lower level of planned growth to slightly reduce overall future travel demand on the highway network in the area. Highways England welcomes the opportunity to comment on the Issues Paper and noted that their principal interest is safeguarding the A1 and A46 which route through the Plan area.

Other responses in support, including one from the development industry noted that the lower figure seems more realistic and deliverable and is based on a more local assessment; the supporting documents set out clearly the methodology used and how conclusions were derived— although this is not in itself an endorsement of the methodology ; and OAN is the generally accepted approach to reaching the housing target, save for consideration of local factors that would impede that delivery or conflict with wider planning and regeneration priorities.

The Homes & Communities Agency notes the reduction in the number of dwellings now proposed and queries whether NSDC has tested this reduction in its discussions with neighbouring authorities under the Duty to Cooperate and if all factors that determine need including future affordable housing, travel to work and employment projections been taken into account in proposing this reduction?

Two other more neutral responses were received. One agreed that an Objectively Assessed Need is the correct approach but when translating the OAN into Policy, the Authority must factor-in historic under-supply, not simply adding this to the future need using the Sedgfield or Liverpool methodologies, but including a realistic buffer to positively plan to reverse the trend of the past decade (or more) of under-supply. The NPPF buffers of 5% or 20% are arbitrary and seek to effect a more immediate increase in figures (if properly implemented through annual review). A suitable annual buffer for the OAN should reflect the average annual undersupply within the District and the NPPF requirement to significantly increase the number of new homes. Another noted that the government's intention that there be a significant boost to housing delivery is not best served by an approach that may be described as 'this much and no more'. The Council should consider the reduction in the total provision in relation to the three strands of sustainable development - providing less growth than previously envisaged will have economic implications and will give rise to fewer new facilities and less infrastructure

Three responses from Gladman, Nexus Planning on behalf of Hollins Strategic Land and Define on behalf of William Davis Ltd raise the following detailed response to the Strategic Housing Market Assessment:

- The selected Housing Market Area has substantial migration and commuting flows beyond its borders and the SHMA does not adequately assess future levels of likely migration from outside of the HMA.
- It is based upon much lower levels of net migration than have occurred in the past – the recent average rates being dominated by a few years of low

migration as a result of the recession, a very short term trend which is now clearly over, with rates returning strongly to past levels. The most appropriate demographic projection is one based on the application of long-term past migration trends which takes account of ebbs and flows in migration that occur and consideration of past data suggests that the population change (and housing need) linked to long-term migration trends is a scenario for Newark and Sherwood which 'could be reasonably expected to occur', as required by the Planning Practice Guidance (PPG; 2a-003-20140306). This points to an OAN figure of 500-515 dwellings per annum as one which would reflect long term trends in population growth in the District, and which would also be consistent with the change that the latest evidence suggests has occurred since 2015.

- Market Signals - When responding to market signals PPG is clear that 'a worsening trend in any of these indicators will require upward adjustment to planned housing numbers compared to ones based solely on household projections' (ID: 2a-020). The SHMA takes account of market signals by assuming that future household formation rates in the age group most affected by affordability problems (25-34 year olds) increase to higher levels over the plan period than that suggested by the 2012-based projections. The result of this approach is to add only 8 dwellings per annum to the OAN figure for the District from the preferred scenario figure, resulting in a figure of 454 dpa. The SHMA identifies a specific need in Newark and Sherwood for 284 affordable dwellings per annum at a 25% affordability threshold, 177 at a 30% affordability threshold and 85 at a 35% affordability threshold. In comparative terms, the district is somewhat less affordable than the other HMA districts of Mansfield and Ashfield, and there is clear evidence of worsening trends in recent years. It considered that the proposed uplift of 8 dpa would not have any impact on the affordability problems identified and therefore would not be consistent with the key purpose of the market signals uplift stage of housing need assessment which is to shift the balance of housing demand and supply. It is considered that an OAN figure of 550 dpa would better represent a figure incorporating a reasonable market signals uplift over and above what is a realistic projection of need and therefore is a more appropriate and positive target for the Plan Review to take
- The approach to affordable housing is flawed and does not follow the clear advice set out in the Satnam Judgement and its reliance on private rented sector provision is further contrary to the recent Oadby and Wigston judgement
- LPAs must take a long term view when considering affordability and consider the relative and absolute change over a long term 15-20 year period, they should assess, as a constituent part of their OAN, how they can improve affordability over the life time of a plan to a point where affordability is more in line with average earnings and affordable mortgage lending rates. Only through planning for significant housing growth can local authorities realistically tackle market signals in the way advocated by the PPG and tackle the affordability and housing crisis.
- Total affordable housing need should then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, given the probable percentage of affordable housing to be delivered by market housing led developments. An increase in the total housing figures included in the Local Plan should be considered where it could help deliver the required number of affordable homes.
- It does not sufficiently address the issue of suppressed household formation rates as a result of the recession.

- Employment Forecasts and Past Trends – it is considered that the employment forecasts used in the SHMA (Experian evidence) are modest compared with the jobs growth that the District has achieved over different periods in the past. A higher OAN figure of around 500-515 dpa would provide the District with capacity to support jobs growth that would better reflect the District's past performance, and would be more consistent with the positive approach to planning in support of growth that is central to the NPPF.
- The approach to modelling the impacts of future employment growth is flawed as it is reliant upon substantial increases in the economic activity of all elements of the working age population and there is no evidence that such increases are likely to occur and be sustained over the plan period. These concerns do not seem to have been addressed, and therefore, it must be concluded that the suggested requirement of 9,080 dwellings over the plan period (454 dpa) is not an appropriate figure to become the District housing target.

Conclusions drawn on these issues are that the SHMA materially under-estimates the OAN, which should in fact be between 500 and 550 dpa having regard to demographic and economic projections, and market signals. We would urge the Council to base the Plan Review on the upper figure of at least 550 dpa in order to plan positively for the area, and respond to the aspirations of the Framework to 'boost' the supply of housing and meet market and affordable housing needs in full. The Council should ensure that it can identify a sufficient range of sustainable sites to support the Local Plan's strategy and ensure housing is delivered to meet the authority's needs. The Local Plan should provide sufficient flexibility to address situations where housing does not come forward as expected, making clear that the authority will seek to maintain at all times a five year supply of deliverable housing sites. It is important to recognise that in some instances this objective may be best achieved through the development of unallocated sites in accordance with the Presumption in Favour of Sustainable Development.

Other comments received note that:

- Local demand should be the main criterion;
- Even with a higher target figure (Regional Plan), the delivery of housing has not been sufficient to meet local needs, particularly for affordable housing. Reducing the target will only worsen this situation;
- The phrase "Objectively Assessed Need" is nonsense; it depends entirely on a whole host of pressures and presuppositions (not to mention a few prejudices) which make objectivity quite impossible.
- The SHMA appears to suggest less development in Mansfield than in Newark & Sherwood or Ashfield. Therefore, consideration should be given towards increasing the Mansfield allocation slightly and reducing the others. This plan does not mention the distribution of housing within the district as recommended in the OAN figure given in paragraph 13.16 of the SHMA report. If this figure is to be adopted, then the Newark & Sherwood

area is already ahead of meeting this target based on developments in Ollerton and Edwinstowe alone.

- The previously adopted housing figures should remain but there should be the ability for them to reflect more local market demands in individual settlements which would assist in "smoothing out" delivery rates. For example, if one settlement is under delivering but there is stronger demand in another settlement, then provide the flexibility for increased delivery in that settlement.
- The new figure appears to be based upon the Objectively Assessed Need figure, with no adjustment taking into account local market or planning considerations. We consider that there should be a more considered assessment of growth options presented for consideration and consultation. This should include higher growth based figure more equivalent to the existing growth levels.

Question 7: Do you agree that the District Council's approach of setting a target range for new employment land requirements?

The majority of responses to this question were generally supportive with many respondents making no further comments including those from Blidworth, Norwell, Rufford and Wellow Parish Councils and Ollerton & Boughton Town Council.

Collingham Parish Council note that employment is needed to prevent villages become dormitories and needing to travel to their place of work. Fernwood Parish Council comment that the range does not identify industry target types and a decision needs to be made as to what kind of area NSDC is ie industrial or commercial so that the targeting does not result in land availability with no industry on it. South Muskham and Little Carlton Parish Council think that consideration should be given to the future of current large employers with discussion taking place with at least 10 major employers in the region. Southwell Town Council note the different units used for the different B Use classes so there is no indication of the actual total land area requirement for all types and query what the floor space/land area conversion criteria are. Southwell Civic Society also support the target range approach but query whether the densities quoted include roads and parking areas or if they are the net areas of the buildings.

Highways England acknowledges the reduced housing and employment targets proposed and would expect this to slightly reduce overall future travel demand on the highway network in the area. They note their principal interest is safeguarding the A1 and A46 routes through the Plan area.

Nottinghamshire County Council notes that Table 3.26 needs units identifying as ha. and would agree with a range to reflect economic conditions.

Newark town Council disagreed with the proposed approach, saying that the starting point for calculations of future targets may be flawed because the document does not 'reflect the current reduction in existing employment sites'.

Respondents linked to the development industry generally supported the approach but made the following additional comments:

- the upper target should not be treated as a maximum figure
- sufficient flexibility needs to be accommodated in the Plan to deliver a strong and prosperous economy
- Need for flexibility where proposals would result in atypical plot densities or employment densities within new buildings
- Note that the typical plot and employment densities for B1a and B1b uses are markedly different in our experience so their amalgamation may not be robust.

Reference is also made to the suitability of their site submission for land East of Harrow Lane, Boughton to deliver a mixed development.

One individual noted that the District Council needs to allocate as much employment land as possible to encourage sustainable, creative developments to attract business. Another respondent considered that the regeneration priorities should be in the former coal mining districts.

A couple of responses were neutral, one noting they were unsure as to the meaning of "new employment land requirements" and querying if we are now talking about a plurality of Councils. The other thought the approach suggested is too vague to commit either way and a more detailed plan specifically for the Newark & Sherwood district is required.

Question 8: Do you agree with the Council's approach to reviewing development allocations or do you think there is a better approach which should be considered?

There was a reasonable level of support for the Council's approach to reviewing the development allocations. This came both from individuals, Housing Associations, the Canal and River Trust and the wider development industry. Some additional comments were made including the need to use the Sedgfield method when calculating supply, support for giving priority to brownfield sites rather than agricultural land and that any land allocated should be given a build by date or be replaced by sites that are deliverable and have developer / land owner support. One respondent notes the importance of incorporating evidence in terms of the need for changes to allocated sites at an early stage to assist the proper consideration of development management proposals and actions around identifying adequate sites to ensure that need can be met.

Nottinghamshire County Council agrees that a 'call for sites' approach should be used for selecting development allocations.

One local agent notes that the development allocations is a reasonable start point, although there was little opportunity for proper public debate and scrutiny on the selection of allocated sites. The Inspector at the Allocations Inquiry made it very clear that the Inquiry was the wrong environment for a "beauty parade of sites". However if not then, when does that opportunity exist to question and challenge the Councils conclusions on site allocation? It is

submitted that some very good, sustainable sites were over looked and never had a fair hearing.

A number of Parish Councils support the approach to reviewing allocations, with Norwell, Rufford and South Muskham and Little Carlton Parish Councils and Newark Town Council making no further comments. Coddington Parish Council are supportive as well and suggest that the site allocated for mixed use on land north of the A17, NUA/MU/1, be de-allocated since its development relies on the resolution of the traffic issues on the A17 and its related junctions. Ollerton and Boughton Town Council also agree with the approach but would like to know what alternatives were considered. Wellow Parish Council would like due consideration to be shown to conservation areas. Blidworth Parish Council agree - but subject to every village being set an overall increase of 5 dwellings to help prevent land bank acquisitions. Fernwood Parish Council agree but feel that the review should be supported by research regarding type of organisations or businesses which would be attracted to Newark and then decide on allocations. Southwell Civic Society comment that if new sites are found to be more suitable than existing identified sites then consideration should be given to de-allocate the original sites.

Southwell Town Council however do not agree with the approach and make the following comments: You need to engage with the local communities and the emerging neighbourhood plans first. There is no mention of consultation. Objections to proposals have been ignored in the past. You need to take into account the wishes of the community regarding where to allocate the dwellings. Where alternative new sites are identified, less suitable sites need to be de-allocated. The Local Transport Plan review of 2016 needs to be brought into the review. Among other things this is likely to free up the line of the Southwell by-pass where there is land which the community consider to be more suitable than some of the sensitive gateway sites.

Highways England notes that information gathered will be used to prepare a Strategic Housing and Employment Land Availability Assessment (SHLAA) to set out sites' suitability and help to identify any required changes to allocated sites. Highways England will wish to engage with the Council on this work as it progresses. They note their principal interest is safeguarding the A1 and A46 routes through the Plan area.

Anglian Water Services Ltd would welcome the opportunity to provide comments relating to the sites to be identified within the Strategic Housing and Employment Land Availability Assessment and note in relation to the existing and proposed allocations within Anglian Water's area of responsibility it would be helpful to understand the impact that this would have on existing wastewater infrastructure.

Severn Trent Water set out their position statement with regards to their Sewerage Strategy, Surface Water and Sewer Flooding, Water Quality, Water Supply and Water Efficiency. They have an obligation to provide water supplies and sewage treatment capacity for future development. It is important for them to work collaboratively with LPA's to provide relevant assessments of the impacts of future developments. Once detailed developments and site specific locations are confirmed by local councils, they are able to provide more specific comments and modelling of the network if required. For most developments they do not foresee any particular issues. Where there may be an issue they would discuss in further detail with the local planning authority. They will complete any necessary improvements to provide additional capacity once there is sufficient confidence that a development will go ahead.

CPRE agree with the structured review process but also welcome the fact that Newark & Sherwood are prepared in principle to consider de-allocation. They

would like to have a dialogue with Newark & Sherwood about the review process. In principle, they agree that village envelopes should be decided in liaison with local communities. However, village envelopes have often been useful in containing settlement form and setting and they are concerned that if the decision to adopt a village envelope is left entirely to a Neighbourhood Plan or similar process, the result will be long delays and villages will be vulnerable to speculative applications.

William Davis Ltd generally agrees with the approach, they have a controlling interest in Site NAP2B Land East of Newark allocated for in the region of 1600 dwellings. Detailed site assessment work is being completed and the initial plans suggest that the total capacity of the site may well be less than that anticipated in the Core Strategy.

Persimmon Homes are in detailed pre-application discussions in respect of just over 50% of allocation NAP2C Land around Fernwood. They consider the Council has set out a logical chronological approach to considering the impact of proposed housing targets and the deliverability of current allocations. They provide details of their engagement with stakeholders and the promoters of the other parts of the allocation as part of the planning application preparation and confirm that this should enable the strategic allocation to be realised in full, with a comprehensive approach to delivery. It is anticipated that dwellings can be delivered from the site as early as 2017, with the allocation delivering homes in a phased approach throughout the plan period. They consider that Newark should remain the primary focus for development in the District.

Persimmon also control site ST/MU/1 in Sutton on Trent allocated in the ADM DPD. They note the issues raised by the Tidal Trent modelling commissioned by the Environment Agency (EA) which stalled the application but confirm that the site has been redesigned to accommodate the revised flood plain and remains a policy compliant scheme.

Nottingham Trent University agree that the Council correctly expresses a preference in its Call for Sites process for brownfield sites. There is equally a need to consider a broad distribution of sites across the District, to be consistent with the adopted Core Strategy and its area objectives. Particular reference is made to policies SoAP 1 and SoAP 2 and the emphasis on supporting the sustainable development of the Nottingham Trent University Brackenhurst Campus. They note that the NPPF clearly offers broader support to rural business than is reflected in the current Spatial Policy 3 and cite the Government's 10 point 'Rural Productivity Plan' (August 2015), which has acknowledged the diversity of our rural areas as an engine for growth and its capability to support and retain a highly skilled workforce. The Dowling Review of Business recognises that the excellence of research generated by our higher education institutions, as well as being worthwhile in its own right, is vital to tackling the productivity gap that is the foremost economic challenge facing the UK.

The existing policy recognition of the Brackenhurst site in the Core Strategy continues to be welcomed and the policy remains relevant for the future ambitions of the site. Student numbers have increased by over 60% over the past decade and the importance of the work carried out at Brackenhurst in developing, supporting and improving a sustainable rural economy cannot be underestimated. A detailed submission has been made indicating the University's aspirations for the future and areas where enhancements to planning policy are sought to support this. A collaborative development partnership between the Council and Nottingham Trent University within the District boundary is essential.

A submission has been made on behalf of Harworth Estates proposing Thoresby Colliery as a development site. The site extends to 197.5ha and is accessed from the A6075 (Ollerton Road), to the north east of the settlement of Edwinstowe. Reference is made to delivering site restoration; its location within an area with potential for tourism growth; where previous transport infrastructure that could support further development, particularly rail, has lain dormant for decades; and notes that the redevelopment of Thoresby Colliery offers the opportunity to deliver residential and employment development alongside high quality open space and leisure opportunities. Opportunities for the extension of the Robin Hood Line; an existing link with the former Dukeries Line which could strengthen the possibility of reinstatement and also provide the opportunity to reopen the dormant Edwinstowe Railway Station. Further benefits are put forward including improved Highways Infrastructure including possible contributions towards improvements at Ollerton Roundabout and Edwinstowe Crossroads. Harworth Estates believe that the redevelopment of Thoresby Colliery provides an opportunity for the District Council to meet its housing and employment requirements through the redevelopment of this highly sustainable brownfield site, without the need to rely on greenfield sites or amendments to the Green Belt; providing an opportunity to regenerate the wider area at this sustainable location, the redevelopment of the site can deliver new homes, commercial development to provide new jobs, and the thorough and careful restoration of the spoil heap to provide leisure and recreation opportunities.

One respondent notes that in undertaking a review of the development allocations it is considered essential that the site review extends beyond those sites allocated. Sufficient flexibility needs to be built into the Plan to ensure delivery over the Plan period. Furthermore, the NPPF requires policies and allocations to be considered against all reasonable alternatives, which must include new sites even if they were not necessarily available for consideration when current allocations were initially set. The Plan should be the subject of ongoing review. It is requested that consideration is given to land East of Harrow Lane, Boughton. The site could deliver a high quality mixed use development, reflecting the adjacent land uses, in a sustainable settlement.

Hollins Strategic Land agree with the review but are concerned that the only reference made to altering the spatial distribution is in paragraph 3.32 which states that the Council 'may also need to consider whether we re-apportion the percentage of development between the different settlements'. The 2015 SHMA recommends a wholly different spatial strategy to that set out in the Core Strategy and HSL consider that a comprehensive review of the spatial distribution must be fundamental to the Plan Review. Most notably it recommends a significant reduction in the proportion of housing need to be provided at Newark – from approximately 72% to 54% of the housing growth within the District. Consequently, the SHMA recommends that the proportion of housing need to be delivered in the Southwell, Sherwood, Mansfield Fringe and Nottingham Fringe areas should be materially increased. They are also concerned that there is no indication that an independent view is to be sought from market experts such as residential agents (for example Savills or JLL who are active in the local residential housing market) to inform the review of the site allocations. Overall, there is concern that the proposed review does not go far enough in that it simply seems to maintain the status quo and reconsider the current position rather than take account of what the new evidence is actually saying or how the market is actually responding.

A local landowner notes that consideration must be given through the call for sites to sites that are suitable and deliverable for Custom Build development. The Council should also develop a Custom Build Register for the district, in light of the recommendations of the SHMA and the Government's intention to

introduce a 'Right to Build'. There should be further research to identify the objectively assessed need for Custom Build housing within the district and ensure that there is a sufficient supply of deliverable sites for Custom Build through the Plan Review and call for sites.

One individual believes that Allocations favour conservative development as the land is predominantly in the hands of larger developers with no interest in change. Another stated that "I see the need for some kind of "development allocation" and I can understand that under time pressure there is a tendency for the Council to accept uncritically the advice of the Officers but I do believe that if they stepped back a bit and considered a broader picture they would often reach different conclusions."

One respondent does not support the process identified. Reference is made to the under provision of sites in Lowdham and Blidworth, blamed on the existence of the Green Belt. Reference is made to another site identified during the early consultation stages which was ultimately excluded on grounds of potential flood risk, notwithstanding that part of the site proposed for development fell within Flood Zone 1 - and that neither the SFRA, nor the landowner's own site specific FRA, concluded a residual flood risk towards that part of the site proposed for development. A consequence of the above is that Lowdham's housing needs now have to be met elsewhere. The requirement for two bedroom dwellings is not being delivered and the affordable housing needs are not being addressed at source.

There is a similar situation at Blidworth. The Consultation Document suggests that Green Belt boundaries will not be further reviewed and any unmet housing need and/or sites that might not come forward as originally envisaged will simply be directed elsewhere and the Core Strategy requirements for that settlement to be tailored (reduced) accordingly. Such an approach is considered to fly in the face of the objectives behind the Settlement Hierarchy within the Core Strategy and, if adopted, will represent the Council failing those communities. The Council had every opportunity to make sufficient and satisfactory provision at the Site Allocations stage courtesy of Spatial Policy 4a and via an appropriate Green Belt review, including the identification of 'safeguarded land' if appropriate. The proposal to lower the housing figures for Lowdham and Blidworth amounts to a 'retro-fit' of housing targets to relinquish the Council of its housing duties to those communities and this is not considered acceptable.

Question 9: Do you agree that no further amendments to the green belt should be made and that if no additional sites are found within Lowdham and Blidworth that their housing figures should be lowered?

There was equal support and opposition for the proposed approach with one neutral response.

Nottinghamshire County commented that the Green Belt should be fixed for the given period of the plan but needs to be flexible and adjusted to reflect reality, so housing figures could be adjusted accordingly.

The National Federation of Gypsy Liaison Groups commented that Green Belt Boundaries are drawn too tightly to accommodate needed development. Lowering figures is an unacceptable solution.

Five Parish Councils agreed with the approach and one disagreed as follows:

- Ollerton & Boughton TC agreed that no further amendments should be made unless the circumstances were exceptional, in line with the NPPF.
- Collingham PC supported the approach but considered that the number of dwellings should not be transferred to non-Green Belt areas.
- South Muskham and Little Carlton, Oxton and Fernwood PC's supported the approach.
- Blidworth PC commented that in order to prevent over intensification of housing in the village they would accept a minor expansion of the greenbelt subject to suitable infrastructure.

Of those that objected to the approach, 4 respondents were site owners or their representatives some of whom used this question to promote their sites. Collectively they considered that in order to meet future housing requirements more development is justified in the Green Belt now and in the future. Other reasons for objecting to the approach were:

- Contrary to the golden thread of sustainable development running through the NPPF.
- Proportional expansion of Blidworth and Rainworth would be preferable to focusing majority of growth on Newark.
- In some cases around the Mansfield fringe settlements, the most sustainable location for growth is in the Green Belt.
- The purposes of including land within the Green Belt are all safeguarded by the Development Plan process and the review process is an appropriate time to review boundaries.
- Displacing housing targets from or reducing targets within a settlement does not address the OAN for the particular settlement or specific policies such as Lo/HN/1.
- Blidworth and Lowdham were identified as sustainable settlements through the Core Strategy and so alternative sites within or adjacent to the settlements (including those previously discounted) should be considered rather than displacing the requirement elsewhere which would be contrary to the aims of the Settlement Hierarchy.
- Lowering the housing figures for Blidworth and Lowdham would amount to a 'retro-fit' of housing targets to relinquish the Council of its responsibilities to those communities.
- It should not be adopted until a review of sites on the edge of the settlements has been carried out.

Of those that supported the approach specific comments were:

- Planned growth should not be re-allocated to other areas as this would impose extra pressure on them. Low rise flats were suggested as a solution.
- Southwell would be an appropriate location to accommodate displaced growth from Blidworth and Lowdham.
- Planned growth should be given to re-allocating growth to settlements where it could support dwindling services.

One respondent considered that the Green Belt should be re-instated in Lowdham as a means of reducing the housing requirement because of inability of existing infrastructure to cope.

Question 10: Do you agree with the areas of minor amendment to Spatial Policies set out in the above table?

Of the thirty-five responses received to Question 10, nineteen were straightforwardly in agreement. Three respondents (Wellow Parish Council, Southwell Town Council and the Southwell Civic Society) agreed with the amendments suggested to Spatial Policies 7 and 9 but not those suggested to Spatial Policy 8.

A property developer suggested that Spatial Policy 6 should also be amended in order to update information about the Community Infrastructure Levy (CIL). Another property developer submitted the following comments:

‘It is considered that Spatial Policy 9 should simply make a distinction as to where the allocation of sites should specifically be restricted, and the amendments proposed by PAS are not appropriate or necessary.

Our view is that to ensure consistency with national policy, regard should be had to footnote 9 of the Framework which provides advice on those areas where development should specifically be restricted, such as sites protected under the Birds and Habitats Directives, SSSI’s, AONB’s, or designated heritage assets.

The need to consider more general impacts on biodiversity and landscape are already adequately covered in other policies such as Core Policy 12 ‘Biodiversity and Green Infrastructure’ and Core Policy 13 ‘Landscape Character’. Furthermore, the Sustainability Appraisal underpinning the site selection process will also take these site specific (and often subjective) considerations into account.’

A third property developer commented:

‘In terms of Spatial Policy 9, we would simply add that it will be important for the allocation process to afford substantial weight to the consideration of whether land allocations provide a realistic prospect of delivery having due regard for market signals, i.e. the 5 stage process envisaged at paragraph 3.31 of the Issues Paper.’

Averham, Kelham and Staythorpe Parish Council expressed concern about the potential for recreational space elsewhere in the District to be lost in relation to amendments to Spatial Policy 8. Also in terms of Spatial Policy 8, the Theatres Trust recommend use of the following definition for community and cultural facilities in the accompanying text and in the glossary:

'Community and cultural facilities provide for the health and wellbeing, spiritual, educational, recreational, leisure and cultural needs of the local community.'

A local land owner suggested that Spatial Policy 9 point 7 'should protect current areas of natural importance and favour land which is not good farmland, whether that be because of poor / wet soils, or land classed as average / poor quality. Any development should be supplemented by environmental enhancement on nearby land and provide for example wild flower meadows, ponds etc. for wildlife. This land owner also commented on Spatial Policy 7, saying that: 'Travel Plans can be a significant financial burden on a development when viability is borderline, as such we would suggest caveating the policy to require Travel Plans where their cost will not be prohibitive'.

A representative of Nottingham Trent University submitted the following comments:

'The amendment to Spatial Policy 9 'Selecting Appropriate Sites for Allocation' bullet point 7 recognises the requirement to be consistent with Paragraph 110 of the National Planning Policy Framework (NPPF), with plans required to allocate land with the least environmental or amenity value. However this is on the premise that they must be consistent with other policies in the framework and the intention of the framework is a preference. In rural areas, it is highly likely that certain sites could have a particular environmental or amenity value in certain aspects, in certain cases can be mitigated successfully in the design and planning process. This will have to be weighed against the social, economic and environmental aspects of sustainable development as a whole when decisions are made to allocate sites for the future growth of the District.'

Nottinghamshire Wildlife Trust provided detailed comments:

Spatial Policy 9 sets out 9 bullet points. Of these, 1-6 and 8 are considered in conformity with the NPPF. However, point numbers 7 and 9 may both need to be strengthened to ensure full consistency with the NPPF. Point 7 seeks 'that allocations would not lead to the loss, or adverse impact on, important nature conservation or biodiversity sites', whereas the NPPF seeks that allocations should 'prefer land of lesser environmental value', which is much broader, covering, for example, landscape and agricultural land classification impacts. In addition, para 109 refers to 'minimising impacts on biodiversity'.

Point 7

There does not appear to be a reference to ecological surveys in the NPPF. The NFFP does, however, in Paragraph 109 refer to 'minimising impacts on biodiversity' and in Paragraph 110 'plans should allocate land of the least environmental value'. Our interpretation of the term 'environmental' would include the ecology of an area and the provision of ecosystem services, including flood risk mitigation. In order to clearly understand the ecological value of an area, robust ecological surveys will be necessary undertaken by suitably qualified ecologists.

We feel that the following mitigation hierarchy could be used to provide greater clarity to the policy:

- Avoid negative ecological impacts, especially those that could be significant;
- Reduce negative impacts that cannot be avoided, and as a last resort;
- Compensate for any remaining significant negative ecological impacts

It should also be recognising that where satisfactory compensation cannot be secured, then permission should not be granted. In this context, the use of compensation in general, and offsetting specifically, must be a last resort, where it has not been possible to firstly avoid impacts, or secondly to provide sufficient mitigation.

Point 9

We support the inclusion of a reference to the sequential, risk based approach (including the Exception Test) required in respect of flood risk to bring the spatial policy more into line with the NPPF. Local Plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property and manage any residual risk, taking account of the impacts of climate change, by:

- applying the Sequential Test;
- if necessary, applying the Exception Test;
- safeguarding land from development that is required for current and future flood management;
- using opportunities offered by new development to reduce the causes and impacts of flooding; and
- where climate change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking opportunities to facilitate the relocation of development, including housing, to more sustainable locations.'

Question 11: Do you agree that the Council should consider area and sub area targets for affordable housing in different parts of the District?

In general terms there was support for the proposed approach. Notably County Councillor John Peck (Rufford Ward) along with Averham, Kelham & Staythorpe, Blidworth, Norwell, Rufford, South Muskham & Little Carlton and Wellow Parish Councils and Ollerton & Boughton, Newark and Southwell Town Councils all provided support. Collingham Parish Council pointed out that the definition of affordable housing was likely to change as a result of government

policy and that all areas of the District require affordable housing. Fernwood Parish Council objected to the approach to area and sub-area targets and also emphasised that care in the placement of affordable housing was required to recognise the needs of retired residents when mixed with young families. Concerns over the approach to the density of development were also raised.

Whilst agreeing that varied targets should be considered the Campaign to Protect Rural England detailed that the potential implications need to be carefully assessed. Citing fears that developers would be attracted to areas with lower affordable housing targets and show a reluctance to develop in areas where a greater proportion of affordable housing is sought – with implications for the sustainability of those settlements. The Homes & Communities Agency point out the changes to affordable housing need since the adoption of the Core Strategy and that welfare reforms have led to a shift in demand to smaller dwelling types. It is therefore stressed that the Authority needs to have a clear understanding of its affordable housing requirements today to ensure that needs are met. Significantly support was provided in the responses from Midlands Rural Housing, Nottinghamshire County Council and Southwell Civic Society.

Turning to the development industry- Nexus Planning support variable targets in so far as it will allow proposals to respond to differing circumstances and ensure that the plan responds effectively to needs. However the approach must be based around and have regard to viability evidence. Persimmon Homes point to emerging government policy and recommend that the approach includes a mechanism to deliver discounted open market value properties and responds to the starter homes agenda. Rippon Homes provided support for the proposed approach. William Davis Ltd highlight viability as the critical issue and that the key is to establish requirements which are deliverable in the first instance. In the case of the strategic sites this needs to take account of site specific circumstances which are likely to result in the need for sub-area affordable housing targets – an approach which would be supported.

The response on behalf of Minster Veterinary Centre (promoting a site adjoining Southwell) points to a clear and pressing need for affordable housing within the district which sub-area targets would help to provide greater clarity and certainty over future delivery requirements. The response also advises that an increase in total housing figures included in a Local Plan can be considered where it could help deliver the OAN for affordable homes, having had regard to the constraints identified in Paragraphs 14 and 47 of the NPPF. It is argued therefore that to assist in meeting the clear identified need for affordable housing the Authority should increase the overall housing target across the plan period. Given the reductions in grant funding available it is portrayed as imperative that the Authority work closely with the private sector to deliver affordable housing through increased overall housing delivery to enable cross subsidy of affordable housing. Similarly the response from Copesticks Ltd, on behalf of a private individual, took a similar line emphasising support in the interests of meeting in full the District's OAN. This included the importance of identifying a housing target which will meet affordable housing needs in full.

Town-Planning.co.uk set out that as the majority of housing is focused in the Newark Urban Area and these sites provide the best access to services, facilities and public transport then the urban extensions should provide the highest targets for affordable housing. The response also points to the outcome of the Government appeal over base affordable housing thresholds.

The majority of responses from residents provided support for the approach, save for one notable comment which questioned the need for any approach to

affordable housing provision given the likely direction of government policy and highlighting a confusion between affordable housing and affordability.

Question 12: Do you agree that the Council should include more detail in its policies regarding type of new housing required within an updated policy?

In general terms there was support for the proposed approach. In respect of local representatives County Councillor John Peck (Rufford Ward) along with Averham, Kelham & Staythorpe, Blidworth, Collingham, Fernwood, Norwell, Rufford, South Muskham & Little Carlton Parish Councils all provided support. As did Ollerton & Boughton and Southwell Town Councils. Newark Town Council were also supportive and said that they wanted policies that encouraged greater flexibility in the design of new houses and led to the delivery of more affordable homes. The response from Southwell fell back to content within the Town's emerging Neighbourhood Plan and also emphasised the need for open book viability assessments, as well as putting forward that off-site provision should only be acceptable in extreme circumstances.

On the basis that there exists clearly demonstrated need then the Campaign to Protect Rural England would provide support for the proposed approach. The body also advises that the introduction of 'starter homes' will need to be factored into any new policy approach – though concerns are expressed that this product may undermine affordable housing delivery in rural areas. Through the response the continued preparedness of the body to work with partners to increase the supply of affordable housing in rural areas is underlined. The Homes & Communities Agency supported the proposed approach and drew particular attention to addressing extra care and supported housing needs. Support for the approach outlined in the Paper was also provided by the County Council, Midlands Rural Housing and Southwell Civic Society.

In respect of the development industry- Nexus Planning, on behalf of Hollins Strategic Land, argued against being too prescriptive over type and mix, setting out that this would be liable to becoming quickly outdated and inconsistent with paragraph 50 of the NPPF which requires flexibility over mix. The alternative approach suggested is one based around location, nature of the scheme, viability and the latest most up to date information over local housing need. In providing support Rippon Homes nonetheless also advised against a prescriptive approach. The response pointed to parts of the District where there will be a greater demand for 4+ bed units which developers will need to be able to meet.

William Davis also warned against prescription over mix and highlighted the potentially significant implications on the viability of the strategic sites from the recommended mix (50% 1&2 bed and 50% 3&4 bed) in the Housing Market & Needs Assessment. The need for flexibility to take account of changes across the plan period – particularly to demand is emphasised. The comments also point out that the conclusions in the assessment seem to be based more around 'need' than 'demand'. With attention being drawn to Paragraph 50 of the NPPF which requires plan makers to reflect demand in identifying the size, type, tenure and range of housing required in a particular location. The indicated demand within the market sector for 3+ bed dwellings in the Newark Area is greater than the suggested policy approach. Therefore the response puts forward an alternative sub-area based approach to ensure that housing provision appropriately reflects housing demand.

Chave Planning considered that the Authority should make specific provision, through site allocation, to meet the needs of the elderly for market and

affordable accommodation. Simply 'encouraging' provision as part of general housing development is unlikely to be effective. Jackson Design & Associates support the approach in principle but advocate the need for flexibility to respond to changes in the market and to reflect local demand. Ian Baseley Associates provided support.

In responding on behalf of Minster Veterinary Centre, Tetlow King Planning identified the need for a policy response to deliver custom and self-build housing. The comments point to the level of interest in this form of housing, the government agenda and successful delivery as part of large sites in Nottingham and Bicester. Comments from Copesticks Ltd on behalf of a local landowner support the proposed approach which they consider will provide clarity and transparency for developers. Though the response later qualifies this by setting out that specific requirements for market homes are not entirely realistic, as developers will have market data demonstrating the level and nature of demand.

Question 13: Do you agree with the Council's assessment of need and approach to providing for it?

The majority of respondents agreed with the assessment of need with one respondent commenting it was well thought out, four objected and there were two neutral responses.

The Homes and Communities Agency question whether the 50% reduction in pitches to reflect those travellers who have settled permanently makes adequate provision for future travellers needs in the area.

The Parish/Town Councils of Norwell, Ollerton & Boughton, South Muskham & Little Carlton, Southwell and Rufford all agreed with the assessment of need. Wellow PC did not agree but offered no explanation.

The East Notts. Travellers Association (ENTA) do not agree with the assessment of need as it is based on estimates. They recognise the difficulty in obtaining accurate figures due to lack of engagement but feel that the actual need would be higher based upon the growth of the population and the new sites that have developed over the previous few years.

The National Federation of Gypsy Liaison Groups considers that the assessment has understated need.

Newark Town Council commented: 'the Town Council doesn't believe that there has been a proper assessment of need for additional gypsy/traveller pitches as a result of the assessed population for that community. Whilst the gypsy/traveller community living in Newark would identify themselves as being from that particular community; many now live in permanent houses and are no longer nomadic. The danger of assessing need purely from a mathematical equation using an assessed number of the population will not give an accurate real demand. In such circumstances this could have the effect of producing an excessive supply which will be taken up from gypsy/travellers outside of the area and artificially increase the population which would in turn produce an ever increasing need based on the current assessment arrangements.'

Question 14: Do you agree with the Council's approach to identifying the proportion of the District's Gypsy and Traveller population who have ceased to travel permanently?

The majority of respondents agreed with the approach with one commenting that those who have stopped travelling should not be taking up pitches.

Nottinghamshire County Council agreed and stated that this will have impact on blocked pitches and need for additional pitches.

Newark Town Council said that the District Council should try harder to identify the number of travellers in the District.

The Homes & Communities Agency stated it would be useful for the evidence on how the assumption was arrived at to be set out.

The East Notts Travellers Association (ENTA) strongly disagree with the Government's definition and consider that the approach is not appropriate as it is based on estimates.

The National Federation of Gypsy and Traveller Liaison Groups consider there is no evidence to support the approach and it would lead to substantial under provision.

The Parish Councils of Ollerton (with reservations over the accuracy of the figures), Blidworth, Fernwood, Norwell, Rufford, Southwell and Southwell Civic Society supported the approach. Fernwood PC additionally requested that site specific considerations are taken into account and stated that the whole report seems to exercise undue bias towards the Gypsy and Traveller community.

South Muskham and Little Carlton PC objected to the approach and stated that a more factual survey should be undertaken to identify permanent non-travelling residents who should be re-housed elsewhere thereby reducing the need for new sites.

Question 15: Do you agree with the Council's strategy for future pitch provision set out above? Do you know of any land that may be suitable to provide pitches?

The majority of respondents agreed with the strategy with one specifically stating that concentration of pitches on Newark and Ollerton is wrong.

The Homes and Community Agency believed that the Council should set out its strategy for future pitch provision. The caveat is that it should be based on evidence of actual need in the District.

Nottinghamshire County Council stated that the strategy will need to be reactive.

Parish Councils of Blidworth, Fernwood, Norwell supported the strategy. Fernwood PC additionally requested site specific considerations are taken into account and justification is provided for additional pitches. Norwell PC stated that rural land would not be suitable for pitch provision and availability of local services should be a paramount consideration.

South Muskham and Little Carlton PC did not agree with the strategy stating that it makes more sense to re-house existing 'settled' Gypsies and Travellers into properties on the same new site to maintain their feeling of community.

Southwell Town Council commented that Gypsy and Traveller sites should be assessed on their own merit and the travelling community be consulted as to their appropriateness for settlement just as allocated housing sites are in the rest of the district.

The East Notts Travellers Association (ENTA) responded that they do not know of and suitable sites and would prefer a Council run site. They consider it would be better for travelling sites to be spread out rather than being all in one area like a concentration camp. Sites near housing developments would help with the breakdown in communication between communities and support the reduction in stereotyping and prejudice the Gypsy and Traveller community face.

Question 16: Do you agree with the amended Core Policy 5 set out above?

The majority of respondents agreed with the amended policy.

One respondent disagreed stating that the pitch sizes do not need to be so large.

Nottinghamshire County Council agree with the amended policy and comment that the pitch sizes seem generous.

The Environment Agency welcomed that point 6 of Core Policy 5 remains unchanged with regard to reference to Planning Policy for Traveller Sites and the NSDC SFRA. Paragraph 11(f) of the PPTF states that LPA's should ensure that traveller sites are sustainable economically, socially and environmentally. Local authorities should therefore ensure their policies do not locate sites in areas at high risk of flooding, including functional floodplains, given the particular vulnerability of caravans. However, it is not clear whether Core Policy 5 is consistent with the principles set out in the District Councils preferred approach to development on Tolney Lane as proposed through Question 17 of this consultation. This particularly relates to the issues regarding the application of the Exception Test, and the requirement for a development to achieve safety for any proposed residents.

Notts. Wildlife Trust were broadly supportive of the criteria included in relation to nature conservation and request minor amendments to the wording.

The National Federation of Gypsy and Traveller Liaison Groups disagreed with the amended policy considering it too restrictive, particularly in referring to reducing the need for long distance travel as this is a fundamental requirement of fulfilling the definition of a traveller. They also consider the pitch sizes unnecessary.

The East Notts Travellers Association (ENTA) agreed with the pitch sizes and types identified within the policy. They do not believe that planning permission should be given on flood risk sites whether a risk assessment is in place or not, this causes a lot of problems for the community as it is. This is not a choice it is a lack of options for them.

The Parish Councils of Blidworth, Collingham, Fernwood, Norwell, South Muskham and Little Carlton agreed with the amended policy. Fernwood PC additionally requested site specific considerations are taken into account. Wellow PC did not agree but offered no explanation.

There were also some non-planning related comments.

Question 17: Do you agree with the Council's approach to new development on Tolney Lane?

There was a high level of support for the approach and only two objections.

The Environment Agency (EA) acknowledged and welcomed the consideration of flood risk that is known to constrain the site. The EA has been extensively involved in discussions regarding the future allocation of pitches at Tolney Lane for many years. The existing use of the land as a gypsy and traveller residential caravan site is classed by the NPPF as a highly vulnerable land use and is not permitted in the Functional Floodplain. When considering new development, only water compatible uses and essential infrastructure should be permitted. We have maintained our position that to allow additional pitch provision is not appropriate in light of the majority of the site and its access being within the Functional Floodplain and the resultant unacceptable level of flood risk posed to residents. They recommend that the Council confirm the approach complies with national planning policy.

The Parish/Town Councils of Blidworth, Fernwood, Norwell, Ollerton and Boughton, South Muskham and Little Carlton, and Southwell supported the approach.

Wellow Parish Council did not agree but offered no explanation.

The East Notts Travellers Association (ENTA) agreed that only temporary permission should be given where the risk of flooding is high, but only if something very specific is done to identify other sites. In the absence of alternative site not at risk of flooding there would be insufficient pitches to pitches to support population growth.

The other objection to the approach was from an agent who considered that Tolney Lane is an integral part of the Newark Urban Area and considers that the Council should work with the community to bring about environmental improvements on Tolney Lane and to introduce additional flood mitigation measures.

Question 18: Do you agree with the Council's approach to retail and town centre uses?

In broad terms there is support for the proposed approach to retail and town centre uses, including positive responses from County Councillor John Peck member for Rufford ward, Ollerton & Boughton Town Council and Averham, Kelham & Staythorpe, Blidworth, Collingham, Rufford, South Muskham & Little Carlton and Wellow Parish Councils. The response from Southwell Town Council fell back to content in the Towns emerging Neighbourhood Plan.

Newark Town Council suggested reviewing the secondary frontage and also requiring sequential assessments of proposed new retail development of over 1000 square metres rather than 2,500 as at present.

Norwell Parish Council objected to the proposed approach suggesting that existing small local stores and the establishment of new ones should be promoted by the Authority to reduce travel, traffic and help sustain the viability, vitality and character of smaller communities.

Fernwood Parish Council also objected to the proposed approach, on the basis that the continued focus on Newark Town Centre would force residents from outlying areas to drive into the town adding to congestion levels. Support could only be provided were the existing road network to be upgraded. Reflecting their interest in the Land around Fernwood strategic site Persimmon Homes also responded, with support being provided for the retention of the existing retail hierarchy and Local Centre status of Fernwood.

In relation to the mixed use allocation at Sutton-on-Trent comments from Town-Planning.co.uk objected to the proposed approach. Suggesting that delivery of the site had stalled as a result of only a residential led scheme being supported. In putting forward an alternative approach the response details that the Authority needs to work with the community and the Lincolnshire Co-operative Society to develop a village retail and community centre which is not housing led.

Responses from the Homes and Communities Agency along with those from other consultees have highlighted the link between the level of need/capacity for future retail and the proposed reduced housing figures. The HCA set out that were the Authority, following consultation with neighbouring Authorities, to increase the level of housing being planned for then there would be a follow-on need to address future retail growth accordingly.

Beyond this detailed responses were received on behalf of respondents with interests in two sites in the Newark Urban Area. Firstly Aylward Town Planning on behalf of Mulberry Property Developments (joint applicant for the pending Sainsbury's proposal on the former County Council depot in Newark) and Planning & Design Group on behalf of NSK.

Through their response Aylward Town Planning set out that although the new Town Centre & Retail Study will result in capacity figures, and also perhaps a recommended spatial distribution, this should not be understood as a cap on development. Indeed it is suggested that the development management process should afford more weight to the impact and sequential tests set out through national policy. Should the work identify qualitative deficiencies from overtrading or spatial gaps in provision then this should given weight and consideration as to how it may be remedied. Support was provided for the existing hierarchy and the role and functions of the respective centres. With respect to the strategic site Local Centres the response advises that should the phasing of their delivery be accelerated (prior to the point where they can be regarded to meet purely local needs) then that should be subject to SEA and assessed in retail impact terms. The response goes onto identify the need for an appropriate framework to measure, benchmark and monitor the characteristics of Newark Town Centre which Policy DM11 requires be taken account of in applying the impact test. Referring back to evidence provided as part of the pending planning application the response argues for the de-allocation of the employment allocation NUA/E/4 and its identification for retail use in line with the proposal.

Planning & Design Group (P&DG) respond on behalf of NSK recognising that much of the comparison retail capacity currently identified through the plan will have been compromised by the Northgate appeal decision. Nonetheless the comments emphasise the continued strategic importance of the NSK mixed use allocation. Whilst the response does acknowledge the changing nature of retail it is nonetheless argued that in order to deliver the relocation of the existing factory, and the regeneration of the site, the precise mix and balance of uses will need to respond to the market in order to maximise site values. To further reduce or limit the potential of NUA/MU/3 to respond to these conditions is presented as premature and unduly restrictive.

The response goes on to provide a detailed appraisal of the implications from changes to the nature of retail development on floorspace requirements. Essentially the case put forward is that the change to floorspace needs from a move to greater online retailing and 'click and collect' are yet to be fully established. Therefore to reduce potential retail floorspace based on traditional, pre-internet, retailing formats and expressions of retail need is argued to be shortsighted and unduly restrictive. Indeed large format retail is presented as likely to be even more important in this scenario through supporting a new, more sustainable pattern of shopping where goods are collected, or delivered, from a warehouse/showroom.

It is put forward that the changes to the nature of retailing in terms of floorspace requirements will be tempered by; an increased requirement for store floorspace to cater for growing online sales, continued growth of store-based shopping, the slow-down of online sales as the market matures, the continued need for a bricks and mortar presence to service 'click and collect' and the multi-channel approach of retailers driving demand for traditional outlets.

As part of the comments P&DG draw attention to the trend of 'polarisation' whereby retailers concentrate on larger schemes in larger centres. It is suggested that this poses challenges to Newark if it is to retain its role and function within the hierarchy of competing centres. In order to address this the

comments emphasise the importance of an approach which takes account of retailer requirements. In comparison retailing terms this is characterised as a preference for clustering in locations where they achieve critical mass and suitable access arrangements for access. Accordingly the strengths of the NSK site in this respect are emphasised, and it is argued that the site constitutes the only suitable and deliverable format to meet these requirements. The commitment to and desire of NSK to relocate within Newark Urban Area is repeated, with one of the employment areas allocated through the strategic sites being cited as a likely location.

Question 19: Do you agree with the Council's proposed approach to Wind Energy?

Of the twenty-six responses received, twenty were supportive.

Wellow Parish Council suggested that the District Council should 'be looking at all renewable energy'. Averham, Kelham and Staythorpe Parish Council supported the District Council's policy being community led in line with the new Government guidance on wind energy. Ollerton & Boughton Town Council emphasised that, when considering planning applications for wind energy, it is important that the planning impacts identified by local communities have been fully addressed and therefore the proposal has their backing.

Halloughton Parish Council said: 'Halloughton fully endorses the Council's proposed community-led approach, specifically that if there are no areas where the local community wants more wind energy, then no land will be allocated. We draw the attention of the Council to the special nature of conservation areas and their setting, and to the need to protect local landscapes and views from intrusive industrial structures such as wind turbines.'

Both Caunton and Upton Parish Councils said that they 'fully agree local communities should make the decisions on wind energy schemes in their locality, irrespective of size.' Norwell Parish Council also expressed this view and went on to say that 'neighbourhood plans should not be required to establish whether a local community wants a scheme in its neighbourhood. This would be cumbersome and expensive simply to exclude a locality for wind energy schemes.'

Rufford Parish Council strongly agreed with the District Council and said that 'there must be more importance placed on the views of local people. Any sites should be identified and agreed in the Neighbourhood Plan for both wind energy and solar farms.' Fernwood Parish Council supported the idea of parish residents having greater decision making powers on wind energy schemes and suggested incentivising 'low carbon' energy. Southwell Town Council wrote: 'encourage every community to have its own source of sustainable energy – wind, solar or ground source. At the moment site locations are finance led not community led'.

A District resident commented on wider issues around energy generation and went on to say: 'The proposals while looking reasonable are politically motivated and designed to kill off further on shore wind power development. There should be a presumption in favour for wind power development unless there are material objections as in all other planning applications.' A local land owner disagreed with the proposed approach and suggested that the Council should identify areas suitable for wind energy, as well as commenting on national policy.

Southwell Civic Society proposed that 'there should be designated allocated zones for wind turbines in the same way as there are industrial zones. The free for all that we have at present time goes against all the basic principles of planning. These zones should be allocated so that they do not affect the integrity of conservation areas, listed buildings or areas of special landscape value.'

The Campaign to Protect Rural England (CPRE) wrote that: 'we agree that it is not desirable simply to allocate areas to wind energy, and that support for wind energy installations from local people is crucial. We have submitted a number of objections to wind energy applications and would like to add that there are good landscape grounds too for not allocating an area in Newark & Sherwood to wind energy. However, we support renewable energy and it is our view that wind has a contribution to make here, but we would like to see more community energy schemes and LPA support for these. Renewable energy schemes developed by, or in close liaison with, local communities, supported by them and meeting their energy needs (or a part of them) are in our view the most sustainable form of renewable energy.'

Question 20: Do you agree with the areas of minor amendment to Core Policies set out in the above table?

Twenty-five of the twenty-six responses received were in agreement with the proposed amendments, including six that were only concerned with Core Policy 7.

Nottingham Trent University submitted these comments: 'We support the proposals to revise the wording in Core Policy 7 of the Core Strategy to be compliant with paragraph 28 of the National Planning Policy Framework, where tourism and visitor based development would be possible in locations that broadly 'respect the character of the countryside'. The current process limiting the interpretation of this policy to specific locations and proposals of a distinct scale overrides the significant role of design and landscaping innovation in the planning process recognised by Core Principle 7 of the NPPF. In addition to making this policy compliant with the national framework, the proposed revision would also be more akin to the Government's Rural Productivity Plan to enhance the conditions for rural business growth.'

Natural England commented that: 'we support the proposal to review Core Policy 7 Tourism Development to ensure that it is compliant with NPPF, however we consider the policy must help to deliver sustainable tourism which does not compromise the high quality environment and special character of the area.' A possible omission in the commentary from the Planning Advisory Service and AECOM on the current Local Plan's conformity with the National Planning Policy Framework (NPPF) is identified by the National Trust, who also suggest an additional amendment: 'The AECOM Plan Review 2015 reviews policies for NPPF conformity only up to Core Policy 13 (see page C-10) and therefore fails to review Core Policy 14: Historic Environment. This omission will need to be addressed.'

National Trust considers that Core Policy 13: Landscape Character ought to be included as an area for minor amendment. While the landscape character approach is generally supported, we believe that the policy should also explicitly seek to protect and enhance 'valued landscapes' in accordance with NPPF

paragraph 109. Guidelines for Landscape and Visual Impact Assessment (3rd Ed.) 2013 provides further advice on valued landscapes.'

Bourne Leisure, a travel agent, submitted a detailed response which is reproduced below:

Core Policy 7: Tourism Development

The adopted Core Strategy (2011) identifies the stimulation of tourism as a key objective and states that new tourist development could complement the existing tourist themes and help to develop a year round tourist economy for the district. Bourne Leisure strongly supports the promotion of tourism within Newark and Sherwood and would emphasise the ongoing value of tourism to the local economy and to creating employment. In consequence it is important that the review of core policies fully supports tourism development and the ongoing investment in new and existing tourism facilities and accommodation, in order to ensure that the District becomes an important tourism destination and that the tourism offer reflects the changing needs of visitors.

Adopted Core Policy 7: Tourism Development supports tourism and visitor-based development, including good quality over-night accommodation, subject to seven criteria. In any reviewed version, Bourne Leisure considers that it is important that the updated policy promotes the enhancement and expansion of tourism facilities or accommodation, and does not overly limit the location of tourism provision.

Bourne Leisure acknowledges that the requirements at the Policy's bullet points 1 and 2, for the development to be appropriate to the size and role of the settlement and acceptable in terms of scale, design and impact upon local character, the built and natural environment, including heritage assets, amenity and transport are important planning considerations, but would emphasise the need to review each proposal on its own merits, to take into account social and economic benefits and in the case of listed buildings, the opportunity to retain a heritage asset in active use.

As acknowledged in the Issues Paper, bullet points 3 and 4 in the adopted policy are significantly more restrictive than indicated by paragraph 28 of the NPPF, which only requires rural tourist development to 'respect the character of the countryside' and 'support the provision and expansion of tourist and visitor facilities in appropriate locations'. The bullets are overly restrictive in terms of directing tourism development, particularly rural tourism, to specific locations (at the edge of town centres or at other accessible locations), or meeting specific requirements (such as supporting local employment, community services and infrastructure). Bourne Leisure therefore considers that a more positive approach to tourism development in rural areas should be promoted in the review of the Core Strategy, including the expansion and enhancement of existing tourist facilities, and the alteration, enhancement and appropriate expansion of listed buildings. This revised approach would then be consistent with the national policy in paragraph 28 of the NPPF to: "support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development"; to "support the sustainable growth and expansion of all types of business and enterprise in rural areas, both through conversion of existing buildings and well-designed new buildings; and to "support sustainable rural tourism and leisure developments that benefit businesses in rural areas, communities and visitors, and which respect the character of the countryside".

Bourne Leisure then endorses the retention of bullet points 6 and 7 which respectively state that tourism will be supported where “the extension of existing tourist accommodation is of a scale appropriate to the sites location and where the extension helps to ensure future business viability”; and where “the development enhances and complements tourism attractions and themes in the District and supports the development of a year-round tourist economy”. The Company would however emphasise that this approach should include the use and appropriate alteration, enhancement and expansion of historic buildings for hotels.

Question 21: Do you agree with the Council’s approach to Area Policies?

A total of twenty six responses were received to this question, seventeen of which agreed, and nine of which disagreed. Many of those arguing in favour of changing the area policies were developers.

A representative of Aspbury Planning wrote: ‘Aspbury Planning have been involved in discussions with NSDC regarding their land interests at Fernwood and the potential to reallocate part of the B1 allocation to alternative uses because of the perceived peak hour impacts of the current allocation of B1 office development on the local and wider road network. Any change to the range of uses to be permitted within the current Employment allocation to potentially include retail development beyond local centre scale would require a change to Area Policy NAP 2C as well as amendment to the retail hierarchy.’

Another developer commented: ‘The Council proposes to progress the Plan Review based on materially different (and in both cases reduced) housing and employment targets. The Issues Paper appears to recognise the need for the Plan Review to undertake a comprehensive review of the current site allocations and sites with planning permission, as well as running a call for sites exercise in order that any issues with deliverability are identified and changes to the site allocations put forward where necessary. As set out in our response to Question 8, we consider a central part of this will be the need to review the distribution of development between the settlements, in order to reflect the updated evidence in the SHMA.

Given this context, it is concerning that Section 5 of the Issues Paper concludes that the paper ‘has identified no need to change the overall strategic context of the Plan’ and that there will be no requirement to amend the Area Policies in the Core Strategy. This statement is of serious concern and in our view, in order to ensure a robust set of Development Plan Documents, the Area Policies must be reviewed and amended where necessary as part of the overall plan review process.’

A firm of planning consultants wrote: ‘I am happy for the Council to review the requirement to amend the area policies as the various elements of the Plan Review take place. However, it is considered that area-based Policy Lo/HN/1 (Housing Need) must be re-visited in the light of the significantly reduced housing requirements and the implications such a policy is clearly having on the delivery of the two small housing sites currently allocated.’

A developer stated: ‘No - taking the approach that the Area Policies will not be reviewed pre-empts the necessary review of other parts of the Core Strategy such as those that relate to potential Green Belt releases around Lowdham, referred to in question 9.’

Persimmon homes submitted the following comments: 'Persimmon Homes is currently preparing a planning application for allocation at NAPC2 Land around Fernwood which is an Area Policy. On this basis Persimmon Homes sets out the following comments where the Area Policy NAP2C should be amended.

Phasing: The policy of the Plan sets out that the scheme will come forward in three phases where each phase is substantially completed before the next phase commences and linked to the timing of the Southern Link Road, and other highways improvements. This component of the policy is out of date as the allocation is being brought forward in parcels of land with separate developers, rather than as one overarching developer. While the policy framework will ensure that the strategic allocation is delivered comprehensively, and Persimmon Homes is working on this basis alongside other developers, the phasing component of the policy is no longer consistent with national policy.

While it is important that the allocation is delivered in an approach that is consistent with the timing of the delivery of infrastructure, it is not consistent with the NPPF to hold back residential phases of the allocation until previous phases have been substantially completed, as the policy requires. This element of the policy should be removed as it is not consistent with the NPPF.

Similarly, the allocation is not linked to the delivery of the Southern Link Road as this is being delivered by alternative mechanisms associated with Newark South urban extension. As such this reference in the policy should be removed;

Housing Standards and outdated references: elements of the policy are framed within PPG3 and the Code for Sustainable Homes. These elements should be updated and reflect recent policy and guidance on such matters;

Local Centre: The reference for health facilities, in particular the requirement for 3 GPs needs to be substantially updated to reflect the latest infrastructure requirements of providers. It is recommended that this be revised to reflect infrastructure required to deliver and mitigate the development.

In addition, the requirement for a Retail Impact Assessment set out in the policy is no longer required as the policy is inconsistent with paragraphs 24 and 26 of the NPPF as the local centre at Land around Fernwood is defined within an adopted local plan. The policy should be updated to reflect this position.

Comprehensive Development: The Council is aware that the allocation is being delivered in a number of individual parcels, where each parcel is coming forward through separate developers. While this is an entirely acceptable way to deliver a strategic allocation, and Persimmon Homes is committed to ensuring that its component of the allocation is fully cohesive with the other parcels of the allocation, the policy should reflect this position. It should include reference to ensure that the solutions and mitigation required to deliver the allocation are delivered cumulatively with each parcel brought forward contributing equitably and consistent with delivering a comprehensive urban extension to Newark.'

Additional comments

A number of additional comments were made that do not directly relate to the above questions. They can be summarised as follows:

- Support for re-development of Thoresby Colliery
- General support for re-development of brownfield land.
- Support for Newark rail flyover.
- Important that all new development is sustainable and maintains the District's natural and built environment.

It was requested that site NUA/E/4 (Former highways depot Kelham Road) be de-allocated for employment and re-allocated for retail use.

The East Notts Travellers Association (ENTA) commented that they feel strongly that there is more that could be done by the Local Authority to support the Gypsy and Travelling community to combat stigma, stereotype and discrimination by the non-travelling community. Working with housing developers and with groups like ENTA to try and find ways of moving forward where people can move past the prejudiced view they hold of Travellers and why they won't include them in new planning development sites. A change in the definition of Travellers does nothing but compound the view that this client group's needs are not being met or even taken seriously. Organisations and Local Authorities wonder why they can't engage with this community after they constantly feel a lack of trust and feel let down and then they hear they are not even allowed to be classed as Travellers for the purposes of planning when they have been forced to settle rather than this being a choice. This consultation has done very little to try and engage with a very diverse and hard to reach community. Why was a consultation event not also held on Tolney Lane in the school site especially since there are known problems about reading and writing amongst the travelling community. Not enough was done by the LPA to engage this specific client group.

Fernwood Parish Council commented that in order to service the additional housing the Council needs to push for enhanced and improved infrastructure. Building a single carriageway, southern relief road when it has been recognised that Newark bypass has to be upgraded seems short sighted on the part of Highways England and the District Council. The additional congestion in and around Newark Town centre needs to be addressed and tackled - this includes not only the road infrastructure but also car parking facilities and public transport arrangements. Additional surveys to residents so they are listened to regularly and their needs are taken into consideration. Practicality and not necessarily design needs to be taken into consideration for modern family life. The Upper Witham Internal Drainage Board commented that generally NSDC have the appropriate policies with regard to flood risk and land drainage. These policies should be updated to take into account the changes in Legislation associated with the Flood & Water Management Act 2010 particularly the requirement to the deliver Sustainable Drainage Systems, SuDS

Some respondents also used this section to suggest/promote sites for allocation.