

Issues Paper Comments

Duty to Cooperate

Question 1

Duty to Cooperate

Company Organisation

Agent Company/Organisation

Chave Planning

Comment Reference

PR/IP/0070

Document Section

Section 2

Paragraph

Document Subsection

Duty to Cooperate

Question

Question 1

Support/Object

Comments

Yes, since the current Development Plan was prepared during the recession it is important that it is reviewed to ensure that the housing delivery is taking place as anticipated and to allocate additional housing if necessary. Furthermore, the Plan should be reviewed to take in to account the latest evidence of housing needs in the Housing Market Area and to review any requirements under the Duty to Cooperate, in line with neighbouring authorities.

Company Organisation

Agent Company/Organisation

Copesticks Ltd

Comment Reference

PR/IP/0480

Document Section

Section 2

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Duty to Cooperate

Question

Question 1

Support/Object

Comments

No. Second stage should include a review of the Green Belt to inform the review of existing and proposed allocations. From our research, it is clear that the Mansfield Fringe Area includes Green Belt sites that are otherwise suitable and possibly the most sustainable options for future development.

Question 1

Duty to Cooperate

Company Organisation

Agent Company/Organisation

Copesticks Ltd

Comment Reference

PR/IP/0458

Document Section

Section 2

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Document Subsection

Duty to Cooperate

Question

Question 1

Support/Object

Comments

Yes it is important to intergrate the gypsy and traveller elements in the wider review.

Question 1

Duty to Cooperate

Company Organisation

Hollins Strategic Land

Agent Company/Organisation

Nexus Planning

Comment Reference

PR/IP/0039

Document Section

Section 2

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Duty to Cooperate

Question

Question 1

Support/Object

Comments

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.

Company Organisation

Mulberry Property Developments

Agent Company/Organisation

Aylward Town Planning

Comment Reference

PR/IP/0008

Document Section

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Duty to Cooperate

Question

Question 1

Support/Object

Comments

We have made some general comments below in terms of the OAN, and more detailed comments in respect of employment land and retail policy matters. We raise no other points or disagreements with other elements of the Council's approach- specifically we take no position in terms of matters pertaining to Gypsy and Traveller elements.

Question 1

Duty to Cooperate

Company Organisation

Persimmon Homes

Agent Company/Organisation

RPS

Comment Reference

PR/IP/0108

Document Section

Section 2

Paragraph

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Duty to Cooperate

Question

Question 1

Support/Object

Comments

Persimmon homes supports the Council's intentions to review the Local Plan and ensure that the development plan process remains plan led and up to date. The consolidation of various development plan documents into a single Local Plan document is also welcomed.

In respect of the stages of plan review set out in the document (pages 3 and 4 refer), Persimmon Homes make the following points.

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.

Company Organisation

Rippon Homes

Agent Company/Organisation

Landmark Planning

Comment Reference

PR/IP/0494

Document Section

Section 2

Paragraph

Document Subsection

Duty to Cooperate

Question

Question 1

Support/Object

Comments

Yes. The various stages set out in paragraph 2.8 of the paper are sufficient, however, I suggest that the Plan is clear that the revised housing need figure has had regard to the recently published household projections. The review of extant policies should include a review of village envelopes in the main settlements and if appropriate, selected releases of land from the Nottingham---Derby Green Belt on the edge of sustainable settlements such as Lowdham/Caythorpe. The review should also take account of recent Ministerial Statements regarding the need to boost housing delivery in addition to a review against the guidance contained in the NPPF. Paragraph 3.4 lists the specific issues that the Plan Review will address and recognises an issue in relation to housing provision at Lowdham but suggests that a lower overall requirement for housing may mean that the targets in such locations are reduced. This should be critically examined in the light of the presumption in favour of sustainable development promoted in the NPPF, particularly in relation to the more sustainable settlements such as Lowdham/Caythorpe that have the potential to accommodate further growth without significant detriment to the environment. The requirement to provide a continuous supply of deliverable housing sites should not be regarded as a ceiling on development in such locations.

Duty to Cooperate

Question 2

Duty to Cooperate

Company Organisation

Agent Company/Organisation

Comment Reference

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Company Organisation

Agent Company/Organisation

Comment Reference

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Question

Support/Object

Comments

Question 2

Duty to Cooperate

Company Organisation

Agent Company/Organisation

Comment Reference

Document Section

Paragraph

Document Subsection

Question

Support/Object

Comments

Company Organisation

Agent Company/Organisation

Jackson Design Associates Ltd

Comment Reference

PR/IP/0049

Document Section

Section 2

Paragraph

Document Subsection

Duty to Cooperate

Question

Question 2

Support/Object

Support

Comments

Question 2

Duty to Cooperate

Company Organisation

Agent Company/Organisation

Fisher German LLP

Comment Reference

PR/IP/0031

Document Section

Section 2

Paragraph

Document Subsection

Duty to Cooperate

Question

Question 2

Support/Object

Comments

The Plan period proposed is for a twenty year period. Paragraph 157 of the National Planning Policy Framework (NPPF) states that Local Plans should be "drawn up over an appropriate time scale, preferably a 15 year time horizon, take account of longer term requirements, and be kept up to date". A Plan Period of 2013 to 2028 is therefore considered more appropriate in order to ensure conformity with the NPPF.

In addition, a commitment to the ongoing review of the Local Plan should be provided for in order to ensure that the Plan is kept up to date and and is in accordance with the most up to date policy guidance available at that point in time. Regular reviews will also ensure the ongoing review of the deliverability of the Plan allocations to seek to ensure that the Council meets its housing and employment targets.

Company Organisation

Persimmon Homes

Agent Company/Organisation

RPS

Comment Reference

PR/IP/0109

Document Section

Section 2

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Duty to Cooperate

Question

Question 2

Support/Object

Comments

Extending the plan period to 2033 from a revised base date of 2013 is a positive step and supported. Persimmon Homes supports this statement that the Council can meet its objectively assessed need in full.

Question 2

Duty to Cooperate

Company Organisation

Rippon Homes

Agent Company/Organisation

Landmark Planning

Comment Reference

PR/IP/0495

Document Section

Section 2

Paragraph

Document Subsection

Duty to Cooperate

Question

Question 2

Support/Object

Comments

Yes, the plan period is an appropriate length for the authority to be able to take account of longer-term requirements, including the need to plan for additional growth to response to household projections (although the latest projections extend to 2027 which is past the plan end date).

Settlement Hierarchy

Question 3

Settlement Hierarchy

Company Organisation

Agent Company/Organisation

Comment Reference

Document Section

Paragraph

Document Subsection

Question

Support/Object

Comments

Yes. The current Development Plan is unhelpful in the way that it does not identify villages beyond Principal Villages where development might be accommodated. The policy considerations applied in decision making rely heavily upon informal guidance in 'Spatial Policy 3 Guidance Note', which has not been consulted on, nor subject to independent examination. This is considered to be an inappropriate basis for decision making and the opportunity should be taken to set out the future basis for decision making in a Development Plan.

Furthermore, as noted by the Council in the consultation document, the current Development Plan policy has resulted in concerns that local housing needs are not being catered for. It is therefore very important that the Local Plan Review provides policy means for an appropriate level of development to come forward at villages. The new policy should set out the circumstances in which new housing development would be viewed favourably within and outside the built up area of villages.

Company Organisation

Agent Company/Organisation

Comment Reference

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Paragraph

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Question

Support/Object

Comments

Question 3

Settlement Hierarchy

Company Organisation

Agent Company/Organisation

Copesticks Ltd

Comment Reference

PR/IP/0460

Document Section

Section 3

Paragraph

Document Subsection

Settlement Hierarchy

Question

Question 3

Support/Object

Comments

Settlement hierarchy is ok but it should accurately refelect the demand for houses. Particularly from local residents.

Company Organisation

Agent Company/Organisation

Jackson Design Associates Ltd

Comment Reference

PR/IP/0050

Document Section

Section 3

Paragraph

Document Subsection

Settlement Hierarchy

Question

Question 3

Support/Object

Comments

No. The existing settlement hierarchy is sensible and directs development to sustainable developments through it's classification of Service Centres and Principal Villages and avoids inappropriate development in smaller non sustainable locations.

Question 3

Settlement Hierarchy

Company Organisation

Agent Company/Organisation

Comment Reference

Document Section

Paragraph

Document Subsection

Question

Support/Object

Comments

No comments on the Settlement Hierarchy are made in respect of identification of villages below Principle Villages.

The settlement hierarchy, as detailed within the table supporting paragraph 3.5 is however supported. As detailed within paragraph 3.6 of the Issues Paper whilst some services may have changed however, "the general characteristics of the settlements in the hierarchy remains the same and therefore these settlements should continue to be those which are identified as central to delivering the spatial strategy". It is therefore appropriate to maintain the existing hierarchy.

The identification of Ollerton and Boughton as a 'Service Centre' is supported in particular. The settlement has a good range of services and facilities, including a secondary school. Strong public transport links and a good level of employment opportunities helps create a sustainable settlement capable of accommodating additional housing and employment growth.

Company Organisation

CA Michael and Son

Agent Company/Organisation

Mike Sibthorp Planning

Comment Reference

PR/IP/0358

Document Section

Section 3

Paragraph

Document Subsection

Settlement Hierarchy

Question

Question 3

Support/Object

Comments

3. YES. We consider that the settlement hierarchy should identify villages below principal village level so that they can accommodate limited development.

4. The National Planning Practice Guidance makes very clear that all settlements are capable of accommodating some growth; all settlements can play a role in delivering sustainable development in rural areas - and so blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided unless their use can be supported by robust evidence.

5. In our view, this should be reflected in the settlement hierarchy policies of any future plan. Whilst we accept that the defined principal villages should be the principal focus of housing development outside the urban areas, we consider that policies should support the principle of residential development in all settlements, subject to specified criteria being satisfied. In our view the current Policy 3 ‘needs’ based approach has not adequately or satisfactorily addressed development needs in rural settlements and is inconsistent with the provisions of the NPPG, which acknowledges that all villages are capable of accommodating some growth. There is in our view no particular need to identify a further tier of settlements below principal village level. One policy should reasonably permit an appropriate level of development in rural settlements.

6. Whilst there may be merit in including some form of ‘sustainability test’, this should be a broadly based test, and not confined simply to accessibility / transport sustainability measures. Sustainability can be assessed more broadly than this. As Para.55 of the NPPF makes clear, new housing development can ‘promote sustainable development in rural areas’ and ‘enhance and maintain the vitality of rural communities’. Thus a sustainability test should consider not simply the existing sustainability of a locale, but also the

extent to which any new development will contribute to the future sustainability of that area. Policy should not be contingent upon neighbourhood plan preparation.

Company Organisation Hollins Strategic Land

Agent Company/Organisation Nexus Planning

Comment Reference PR/IP/0040

Document Section Section 3

Paragraph **Document Subsection** Settlement Hierarchy

Question Question 3 **Support/Object**

Comments It is considered that the adopted Settlement Hierarchy is appropriate, and the focus for development should still be the Newark Urban Area, Service Centres and Principal Villages. These settlements all act as hubs catering for the day to day needs of the surrounding rural area and continuing to focus development in these locations helps to promote sustainable patterns of travel and ensure that local shops and services are supported through the introduction of new residents to the benefit of the wider area.

Question 3

Settlement Hierarchy

Company Organisation

Rippon Homes

Agent Company/Organisation

Landmark Planning

Comment Reference

PR/IP/0496

Document Section

Section 3

Paragraph

Document Subsection

Settlement Hierarchy

Question

Question 3

Support/Object

Comments

Yes and a minimum provision (as a % of the whole) for housing should be identified across the settlement tier (rather by individual settlement)

Settlement Hierarchy

Company Organisation

Agent Company/Organisation

Chave Planning

Comment Reference

PR/IP/0073

Document Section

Section 3

Paragraph

Document Subsection

Settlement Hierarchy

Question

Question 4

Support/Object

Comments

The selection of villages suitable for development should be informed by sustainability appraisal of villages and understanding of the local housing needs. The Council should be careful to avoid 'preserving villages in aspic' by ruling out new housing development where the villages have only limited local facilities. Whilst some villages may not have a shop, GP surgery or school, they may nonetheless have valuable local amenities such as public houses and village halls. These local amenities are under threat from declining village populations, due to smaller household sizes and an ageing population. Some development is needed at all villages in order to support such amenities and maintain village life.

Company Organisation

Agent Company/Organisation

Comment Reference

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Paragraph

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Question

Support/Object

Comments

Question 4

Settlement Hierarchy

Company Organisation

Agent Company/Organisation

Comment Reference

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Question

Support/Object

Comments

Company Organisation

Agent Company/Organisation

Comment Reference

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Question

Support/Object

Comments

Only housing where there is a clearly identified local need should be allowed in non Principal Villages and smaller villages should not have allocated housing numbers applied to them. Housing numbers, where allocated, are minimum numbers and it would confuse the clear mandate in the LDF to direct development to sustainable communities. Settlements such as Ollerton (Service centre), Bilsthorpe (Principal Village) or Edwinstowe (Principal Village) have already been reviewed and established that they have the capacity and infrastructure to accommodate new housing supporting a sustainable pattern of development with surplus available sites to deliver any future increased need without reclassifying smaller villages.

Company Organisation

CA Michael and Son

Agent Company/Organisation

Mike Sibthorp Planning

Comment Reference

PR/IP/0359

Document Section

Section 3

Paragraph

Document Subsection

Settlement Hierarchy

Question

Question 4

Support/Object

Comments

We consider, in the light of the relevant provisions of the NPPF and NPPG that the criteria to be adopted should not include, as Policy 3 does at the present time, a needs based test. This we consider to be inconsistent with the NPPF and NPPG. Whilst we would accept that some form of sustainability testing would be appropriate, this must reflect 'sustainability' in its broadest sense, and not confined simply to accessibility and service considerations. Any sustainability criteria should include a consideration of how a development may contribute to the future improved sustainability of a locale, rather than being confined to existing circumstances.

Company Organisation

Rippon Homes

Agent Company/Organisation

Landmark Planning

Comment Reference

PR/IP/0497

Document Section

Section 3

Paragraph

Document Subsection

Settlement Hierarchy

Question

Question 4

Support/Object

Comments

The considerations listed in paragpah 3.6 are appropriate for this assessment.

Settlement Hierarchy

Question 5

Settlement Hierarchy

Company Organisation

Agent Company/Organisation

Chave Planning

Comment Reference

PR/IP/0074

Document Section

Section 3

Paragraph

Document Subsection

Settlement Hierarchy

Question

Question 5

Support/Object

Comments

Edingley village is considered to be a sustainable location for further growth. It is served by a public house and village hall and it is important to allow some housing growth at the village in order to ensure that the vitality of these amenities is maintained. The village is a short distance from further amenities in Farnsfield and Southwell and functions as part of a network of settlements. The housing needs of Edingley should be examined, especially in terms of provision for elderly people.

The 2011 Census identified that 74% of residents in Edingley occupied households with less than 0.5 people per room (the lowest level of occupation). This compared to 64% across the district and 58% across the region. This is a high level of under-occupation and reflects an elderly population in Edingley (29% aged 65 or over) that may wish to downsize to more suitable accommodation within their village community but are unable to do so due to the lack of new housing being built there. The development of housing suitable for elderly people to downsize to has the potential to free up family homes that are currently being under-occupied, to the overall benefit in ensuring housing needs are met.

Company Organisation

Agent Company/Organisation

Comment Reference

Document Section

Paragraph

Document Subsection

Question

Support/Object

Comments

Company Organisation

CA Michael and Son

Agent Company/Organisation

Mike Sibthorp Planning

Comment Reference

PR/IP/0360

Document Section

Section 3

Paragraph

Document Subsection

Settlement Hierarchy

Question

Question 5

Support/Object

Comments

Our view is that in the light of the provisions of the NPPF and NPPG, any rural housing policy should apply equally to all settlements below principal village level. The policy should comprise a criteria based policy that supports the principle of new housing development , within the built up parts of settlements (or wording in similar terms) , subject to a specified set of criteria being satisfied. The se should exclude any specific reference to need, but instead focus upon broadly defined sustainability considerations.

The respondents specific interest in this case relates to the settlement of Caunton. There are some services and facilities within the settlement, and the scope, through development, to enhance those facilities and its overall sustainability. If policy were to define a new tier of ‘more sustainable’ subprincipal village level settlements, we would wish to see Caunton included within any such tier. Our preference however would be for a more broadly defined policy relating to all settlements.

Company Organisation

Rippon Homes

Agent Company/Organisation

Landmark Planning

Comment Reference

PR/IP/0498

Document Section

Section 3

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Document Subsection

Settlement Hierarchy

Question

Question 5

Support/Object

Comments

Given its close relationship with Lowdham, Caythorpe would be appropriate for inclusion although clearly the strongest development potential exists on the edge of Lowdham where services and facilities are available, together with good public transport provision.

Converting the OAN to a Housing Target

Question 6

Converting the OAN to a Housing Target

Company Organisation

Agent Company/Organisation

Copesticks Ltd

Comment Reference

PR/IP/0484

Document Section

Section 3

Paragraph

Document Subsection

Converting the OAN to a Housing Target

Question

Question 6

Support/Object

Comments

No. 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.

Yes, the need should be objectively assessed, however, when translating the OAN into Policy, the Authority must factor-in historic under-supply. Not simply adding this to the future need using the Sedgefield 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 under-supply within the District and the NPPF requirement to significantly increase the number of new homes.

Company Organisation

Agent Company/Organisation

Comment Reference

Document Section

Paragraph

Document Subsection

Question

Support/Object

Comments

Question 6

Converting the OAN to a Housing Target

Company Organisation

Agent Company/Organisation

Jackson Design Associates Ltd

Comment Reference

pr/ip/0052

Document Section

Section 3

Paragraph

Document Subsection

Converting the OAN to a Housing Target

Question

Question 6

Support/Object

Comments

No. 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, as the adopted figures are minimum figures, if one settlement is under delivering but there is stronger demand in another settlement, then provide the flexibility for delivery to be increased in that settlement.

Company Organisation

CA Michael and Son

Agent Company/Organisation

Mike Sibthorp Planning

Comment Reference

PR/IP/0361

Document Section

Section 3

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Document Subsection

Converting the OAN to a Housing Target

Question

Question 6

Support/Object

Comments

We note that the target level of housing provision suggested within the document, equates to 454 dwellings per annum over a 20-year period, compared to the present Core Strategy figure of 740 dwellings per annum. This represents something on the order of a 40% reduction in the overall level of housing provision on a per annum basis. 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 6

Converting the OAN to a Housing Target

Company Organisation

Hollins Strategic Land

Agent Company/Organisation

Nexus Planning

Comment Reference

PR/IP/0041

Document Section

Section 3

Paragraph

Document Subsection

Converting the OAN to a Housing Target

Question

Question 6

Support/Object

Comments

The Plan Review Issues Paper proposes that the Objectively Assessed Need (OAN) figure derived from the Nottingham Outer Strategic Housing Market Assessment (SHMA) of 454 dwellings per annum (dpa) should be used as the District’s housing target moving forward. This element of the proposed Plan Review is our greatest area of concern.

Regeneris, a specialist economic and regeneration consultancy, has reviewed the Joint Strategic Housing Market Assessment (SHMA, October 2015) on behalf of HSL and consider that with regard to the following key assumptions, the evidence points to an OAN that is actually considerably higher than the 454 dpa figure being proposed.

Starting point projections – The starting point for Newark and Sherwood is based on the 2012-based ONS sub-national population projections and the 2012-based DCLG household projections. However, in contrast to the SHMA, the work undertaken by Regeneris concludes that the most appropriate demographic projection is one based on the application of long-term past migration trends. A long-term trend based approach 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.

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.

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 is 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.

In conclusion, it is considered that the conclusions of the SHMA materially under-estimate 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.

Question 6

Converting the OAN to a Housing Target

Company Organisation

Minster Veterinary Centre

Agent Company/Organisation

Tetlow King Planning

Comment Reference

PR/IP/0004

Document Section

Section 3

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Converting the OAN to a Housing Target

Question

Question 6

Support/Object

Comments

The October 2015 Nottingham Outer Strategic Housing Market Assessment (SHMA) fails to adequately assess the need for Custom Build in the Housing Market Area (HMA). Paragraph 9.72 acknowledges that SHMAs need to investigate the contribution that Custom Build makes towards local supply and references the 2011 Housing Strategy for England which identified barriers to such development, including a lack of land. At paragraph 9.73 the SHMA accepts that the Government aspires to make custom-build a mainstream housing option by asking local authorities to champion the sector. The SHMA goes on to identify that within the Newark and Sherwood council post codes there were 28 people registered on the Custom Build register and 148 members on the Plotsearch register.

Paragraph 9.78 of the SHMA accepts that there is potential through policy to encourage developers of larger schemes to designate parts of these as plots available for custom build and notes that local authorities could develop and maintain registers of those with an interest in Custom Build. The SHMAs key findings in relation to custom build recommends that the Council implements a custom-build register. This is particularly pertinent given that the Government has legislated to introduce a 'Right to Build' which is anticipated to become operational in 2016 which will require Councils to assess demand for Custom and Self Build and have regard to this demand in the allocation of land for development.

The Self-Build and Custom Housebuilding Bill gained government support in the 2014-15 Parliamentary Session and obtained Royal Assent on 26 March 2015. The Act required local planning authorities to establish local registers of custom builders who wish to acquire suitable land to build their own home. It also requires local authorities to have regard to the demand on their local register when exercising planning and other relevant functions. The Government said it would build upon the legislative framework provided by the Self-Build and Custom Housebuilding Act 2015 to introduce a Right to Build under which local authorities would be required to bring forward plots of land for registered custom builders in a reasonable time.

The Conservative Party's 2015 Manifesto contained a commitment to introduce a Right to Build and double the number of self and custom build

Question 6

Converting the OAN to a Housing Target

homes by 2020.

It is considered that the objectively assessed need set out in the SHMA fails to adequately consider the need for Custom Build within Newark and Sherwood district. In light of this the Plan Review should undertake further analysis to establish the objectively assessed need for Custom Build and make appropriate provision through policy for its delivery.

Company Organisation

Mulberry Property Developments

Agent Company/Organisation

Aylward Town Planning

Comment Reference

PR/IP/0009

Document Section

Section 3

Paragraph

Document Subsection

Converting the OAN to a Housing Target

Question

Question 6

Support/Object

Comments

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 (i.e. for growth). If the Council is satisfied that the OAN is achievable and consistent with their wider priorities then it would appear appropriate.

Company Organisation

Rippon Homes

Agent Company/Organisation

Landmark Planning

Comment Reference

PR/IP/0499

Document Section

Section 3

Paragraph

Document Subsection

Converting the OAN to a Housing Target

Question

Question 6

Support/Object

Comments

The recent SHMA represents the most up to date assessment of housing need in the area and accordingly is an appropriate figure for planning for growth. As referred to in response to question 1, however, 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'. Furthermore, 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.

Question 6

Converting the OAN to a Housing Target

Company Organisation

William Davis Ltd

Agent Company/Organisation

DEFINE

Comment Reference

PR/IP/0035

Document Section

Section 3

Paragraph

Document Subsection

Converting the OAN to a Housing Target

Question

Question 6

Support/Object

Comments

You will be aware that my clients have previously submitted a paper to you in relation to the Strategic Housing Market Assessment (SHMA) that has been prepared to underpin the review of the Local Plan. The paper prepared by the Strategic Planning Research Unit of DLP Planning Limited, concluded that the SHMA does not present a full objective assessment of housing need for the following reasons:

- 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.
- It does not sufficiently address the issue of suppressed household formation rates as a result of the recession.
- 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.
- 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.

Employment Target

Question 7

Employment Target

Company Organisation

Agent Company/Organisation

Copesticks Ltd

Comment Reference

PR/IP/0485

Document Section

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Question 7

Support/Object

Support

Comments

Company Organisation

Agent Company/Organisation

Comment Reference

Document Section

Paragraph

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Support/Object

Comments

Question 7

Employment Target

Company Organisation

Agent Company/Organisation

Fisher German LLP

Comment Reference

PR/IP/0033

Document Section

Section 3

Paragraph

Document Subsection

Employment Target

Question

Question 7

Support/Object

Comments

The approach to provide a target range for employment land is supported however, in setting a target range, the upper target should not be treated as a maximum figure. As detailed previously, sufficient flexibility needs to be accommodated within the Plan in order to deliver a strong and prosperous economy for the District.

As detailed previously, the land at East of Harrow Lane, Boughton offers an opportunity to deliver a mixed use development, providing high quality residential development adjacent to existing residential properties as well as linking to the existing employment provision to the east. The site submission submitted to the 'Call for Sites' accompanies these representations.

Company Organisation

Mulberry Property Developments

Agent Company/Organisation

Aylward Town Planning

Comment Reference

PR/IP/0010

Document Section

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Employment Target

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Support/Object

Comments

In principle it is sensible to set a target range for the allocation process in terms of land area and floorspace, albeit that there will be a need for some flexibility where proposals would result in atypical plot densities or employment densities within new buildings. We would 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.

Company Organisation

Rippon Homes

Agent Company/Organisation

Landmark Planning

Comment Reference

PR/IP/0500

Document Section

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Document Subsection

Employment Target

Question

Question 7

Support/Object

Support

Comments

Impacts of the propose Housing and Employment Targets

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Impacts of the propose Housing and Employment Targets

Company Organisation

Agent Company/Organisation

Copesticks Ltd

Comment Reference

PR/IP/0465

Document Section

Section 3

Paragraph

Document Subsection

Impacts of the propose Housing and Employment Targets

Question

Question 8

Support/Object

Comments

The Sedgefield Method should be used to calculate the required supply. Any Land given an allocation should be given a build by date or be replaced by sites that are deliverable and have developer / land owner support.

Company Organisation

Agent Company/Organisation

Copesticks Ltd

Comment Reference

PR/IP/0486

Document Section

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Impacts of the propose Housing and Employment Targets

Question

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Support/Object

Support

Comments

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Impacts of the propose Housing and Employment Targets

Company Organisation

Agent Company/Organisation

Jackson Design Associates Ltd

Comment Reference

PR/IP/0053

Document Section

Section 3

Paragraph

Document Subsection

Impacts of the propose Housing and Employment Targets

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Question 8

Support/Object

Comments

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.

Company Organisation

Agent Company/Organisation

Fisher German LLP

Comment Reference

PR/IP/0034

Document Section

Section 3

Paragraph

Document Subsection

Impacts of the propose Housing and Employment Targets

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Question 8

Support/Object

Comments

In undertaking a review of the development allocations it is considered essential that the site review extends beyond those sites allocated. As detailed previously whilst the Council considers it has an over supply of 38 dwellings on allocated sites (against the updated need), 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.

It is recognised that the review of sites as part of the Local Plan Review will identify some sites which are unlikely to deliver however, there will be other sites which for whatever reason may stall during the Plan period. Sufficient land therefore needs to be identified now in order to allow for this.

In addition, and as set out in response to Question 2, the Plan should be the subject of ongoing review to enable regular review of all allocations. In considering new allocations, 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.

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Impacts of the propose Housing and Employment Targets

Company Organisation

Harworth Estates

Agent Company/Organisation

Pegasus Group

Comment Reference

PR/IP/0107

Document Section

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Impacts of the propose Housing and Employment Targets

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Question 8

Support/Object

Comments

Pegasus Group act on behalf of Harworth Estates who have interests at Thoresby Colliery. Thoresby Colliery closed in July 2015 after 90 years of mining and with the loss of over 400 jobs. In October 2015 Harworth Estates acquired Thoresby Colliery, and as landowner, Harworth Estates has aspirations for the site’s redevelopment whilst ensuring it fits with the wider plans and ambitions for the area.

The site extends to 197.5ha and is accessed from the A6075 (Ollerton Road), to the north east of the settlement of Edwinstowe, within the administrative boundaries of Newark and Sherwood District Council.

The short term impact of the closure of the Colliery will be felt locally. However the closure also releases this important site, situated at the edge of the Sherwood Forest County Park and adjacent to the historic village of Edwinstowe, for development. Whilst the Colliery requires substantial remediation and restoration following nine decades of deep mining, it also possesses a number of assets including:

- High power capabilities;
- Existing road infrastructure into and through the site;
- Gas and water supplies;
- Drainage already in situ; and
- An on-site rail connection, with access to the freight network.

The site is already subject to a restoration plan for the spoil heap which has been agreed with Nottinghamshire County Council. This would see

heathland, grassland and woodland return to the area following restoration. Whilst Harworth Estates is committed to delivering this on part of the site, other parts of the site lend themselves extremely well to future development owing to the above significant industrial assets constructed to support the Colliery's operation.

The Colliery also lies within an area with huge potential for further tourism growth, on the edge of the Sherwood Forest and adjacent to Center Parcs, and where previous transport infrastructure that could support further development, particularly rail, has lain dormant for decades. The redevelopment of Thoresby Colliery offers the opportunity to deliver residential and employment development alongside high quality open space and leisure opportunities.

The redevelopment of the Colliery can act as a trigger for the area's sustainable development; improving economic growth in North Nottinghamshire and improving the existing leisure offer. Development on the site will help to replace the 400 jobs lost from the Colliery and allow the Council to capitalise on its natural and tourism assets such as the Sherwood Forest and Major Oak. Harworth Estates is also conscious that any redevelopment must be environmentally responsible and framed around the plentiful natural resources that exist in North Nottinghamshire. Development proposals will fully account for this requirement.

The careful redevelopment of the Colliery provides an impetus for the area's wider regeneration, particularly in supporting a significant upgrade in transport infrastructure that will better connect residents and businesses and underpins the area's substantial leisure offer.

Robin Hood Line

The redevelopment of Thoresby Colliery offers a chance to extend the Robin Hood Line for the benefit of local businesses and passengers.

Nottinghamshire County Council is actively promoting the extension of the Robin Hood Line through the re-opening of the 'Dukeries Line' for passenger transport; this would reconnect Edwinstowe and Ollerton with the wider rail network, which has not been in place since the 1950s. This would create opportunities for local commuters and businesses, and would help significantly with transport to major tourism destinations such as the Sherwood Forest Visitor Centre and Center Parcs. Thoresby Colliery's existing link with the former Dukeries line means that any redevelopment could add passenger numbers – hence significantly strengthening the economic case for its reinstatement. This reinstatement would also provide the opportunity to reopen the dormant Edwinstowe Railway Station. Edwinstowe Station is only a short walk from the existing Sherwood Forest Visitor Centre and Thoresby Colliery. The potential to establish public transport connections to local tourist destinations including Center Parcs and Sherwood Forest Visitor Centre provides further impetus for the economic regeneration of the wider area. The key barrier to its reinstatement remains cost. The redevelopment of Thoresby Colliery is unique in that it provides an opportunity to support a business case for the reopening of the line.

Improved Highways Infrastructure

Any redevelopment of Thoresby Colliery also provides, through Section 106 contributions, the opportunity for priority local highways improvements to be delivered.

Ollerton Roundabout is an important intersection on the County Council's strategic road network that connects the A614, the A6161 and the A6075. Nottinghamshire County Council estimates that around 30,000 vehicles per day pass through the junction. The present roundabout struggles to cope with the volume of traffic that passes through it, particularly at peak times. As a consequence long queues of vehicles can develop on a number of approaches to the junction, causing significant delays to passengers. To avoid this congestion some traffic now uses unsuitable routes through the residential streets within Ollerton village and elsewhere. Planned and committed development in and around Ollerton is only likely to exacerbate the problem in the future if no solution can be achieved.

Following extensive public consultation in 2007, Nottinghamshire County Council developed a preferred major improvement scheme based on a significant enlargement of the existing roundabout. This scheme is estimated to cost £3million and its implementation has been delayed due to a lack of available funding. Thoresby Colliery's redevelopment would help to deliver a contribution towards these highway improvements.

Edwinstowe Crossroads is a congested local route in the centre of Edwinstowe that is directly affected by those wanting to park in or around the Sherwood Forest and its visitor centre. The restoration of the spoil heap at Thoresby Colliery could provide an access road from the road network to the new Visitor Centre, thus reducing congestion in the centre of Edwinstowe. The Concept Plan at Appendix 1 shows an access to the Visitors Centre could be provided from within the site. In addition, overspill parking is proposed which will help reduce pressure in Edwinstowe.

Local Engagement

Harworth Estates recognises that long-term partnership working is the critical factor in bringing development forward, and held a stakeholder workshop on Friday 25th September at the Colliery. The event was very well attended and included an 'off road' trip around the Colliery and spoil heap, by Land Rover, to enable those involved in the workshop to appreciate the scale of the opportunities to be considered at Thoresby. A Concept Plan was presented at this workshop to provide attendees with an initial idea and discussion point for how the site could be redeveloped. A follow up workshop was held on Friday 13th November, to take forward the work done at the first workshop. The Concept Plan was amended as a result of the feedback from stakeholders, and is attached at Appendix 1. This shows a notional figure of 1,000 dwellings which has been included to demonstrate the capacity of the site, along with an employment/leisure hub, and an area for new leisure/recreation uses. This Concept Plan will continue to evolve in light of feedback received at the workshop, meetings with the District Council, continuing discussions with stakeholders and consultation with the wider community.

Conclusions

The Government has emphasised the need to make the best possible use of brownfield land in a way that keeps strong safeguards in place that protect valued countryside. The Plan Review will play a critical role in bringing forward brownfield land. One of the core principles of the NPPF is to

encourage the effective use of land by reusing land that has been previously developed. In line with the principles of sustainable development our proposals at Thoresby Colliery provide the opportunity to deliver a high quality mixed use development with close proximity to employment, shops, services, community facilities, utilities and infrastructure whilst at the same time ensuring the efficient use of previously developed land maximising the regeneration benefits of development and minimising urban sprawl and encroachment into the countryside.

In summary, Harworth Estates support the Council's approach to reviewing development allocations. It is important that the Council reviews current allocations and assesses whether such sites are still deliverable and whether they are now suitable for development. It is noted that the Council will seek to understand the potential new supply of sites; and a Call for Sites submission will be made on behalf of Harworth Estates to demonstrate the suitability of this site for redevelopment. 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.

To conclude, the restoration and redevelopment of Thoresby Colliery provides 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.

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Company Organisation

Hollins Strategic Land

Agent Company/Organisation

Nexus Planning

Comment Reference

PR/IP/0042

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Support/Object

Comments

We agree that it is necessary for the Council to pursue a process of reviewing site allocations and welcome the recognition in the Issues Paper that this is a key purpose of the review, as required by the Inspector who conducted the Examination into the Allocations and Development Management Policies DPD (A&DMDDPD). The Inspector concluded that an early review of the adopted DPDs would be necessary to monitor whether the site allocations are proving deliverable and to provide an opportunity to amend the plan where necessary, to ensure it provides the necessary flexibility, as required by the Framework.

‘Stage 2’ of the site review process sets out that there will be a review of current allocations and sites with planning permission. However, we 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 (upon which the settlement boundaries and site allocations were defined in the A&DMDDPD). As such, HSL consider that a comprehensive review of the spatial distribution must be fundamental to the Plan Review. The Core Strategy sought to direct the majority of housing growth towards Newark in accordance with its Growth Point Status. Accordingly Core Strategy Spatial Policy 2 sets out a requirement to direct at least 70% of housing growth in the District to Newark, and at least 30% elsewhere in the District. Paragraph 13.16 of the SHMA however, concludes on an appropriate spatial distribution. Most notably it recommends a significant reduction, relative to that identified in the CS, in the proportion of housing need to be provided at Newark – a reduction from approximately 72% to 54% of the housing growth within the District. As a consequence, 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 relative to

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that allocated in the CS and A&DMDPD.

As mentioned in our response to Question 1, we 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.

Company Organisation

Minster Veterinary Centre

Agent Company/Organisation

Tetlow King Planning

Comment Reference

PR/IP/0005

Document Section

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Support/Object

Comments

Consideration must be given through the call for sites to sites that are suitable and deliverable for Custom Build development. The Council should also ensure that it develops 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'.

The Council should undertake 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.

Company Organisation

Mulberry Property Developments

Agent Company/Organisation

Aylward Town Planning

Comment Reference

PR/IP/0011

Document Section

Section 3

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Support/Object

Comments

We agree with the principle of the 5 stage process set out at paragraph 3.31 of the Issues Paper. It will be important that the process can incorporate 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 needs can be met.

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Company Organisation

Nottingham Trent University

Agent Company/Organisation

Planning and Design Group

Comment Reference

PR/IP/0244

Document Section

Section 4

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Impacts of the propose Housing and Employment Targets

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Question 8

Support/Object

Comments

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. In the context of Southwell this firstly includes the need to protect the unique historic character of the town while promoting the town's role as a service centre for the wider area and for tourism. Secondly there is great emphasis on supporting the sustainable development of the Nottingham Trent University Brackenhurst Campus, both as a place of learning and as a potential driver for economic growth in the District. The latter area objective for Southwell (SoA O2) is supported by two adopted policies in the Core Strategy, namely SoAP 1, concerning the role and setting of Southwell, and SoAP 2 which is specific to the Brackenhurst Campus.

Policy SoAP 1 states that:

“the District Council and its partners will seek to:....

Encourage the development of new business, local employment and housing,....

...Promote the town as a destination for tourism and leisure activities encouraging events and festivals which attract visitors’

Policy SoAP 2 states the following:

“The District Council will work with Nottingham Trent University and other partners to:

- ②Support the development of new educational and research facilities at the Brackenhurst Campus.
- ②Encourage the development of businesses and companies locally which harness the education and research potential of the Campus.
- ②Ensure that new development does not detrimentally affect the setting of the Campus or the town of Southwell.”

We support the continuation of a distinct policy led enthusiasm to support education as a primary motivator of onward growth in Newark & Sherwood, not merely confined to the educational sector but also to the rural economy in general. The NPPF clearly offers broader support to rural business that is reflected in the current Spatial Policy 3. This is further recently supported by 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.

Within this 10 point plan is a recognised need for improved access to quality education and training, with the Government intending to commit to many of the recommendations contained within the Dowling Review of Business - University Research Collaborations (July 2015). It 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 Government also seeks to ensure that local areas are invited to participate in the reshaping and commissioning of local post 16 skills provision. Accordingly, the Government will support the increase of apprenticeships in rural areas, such as by tripling the availability of those in food and farming, some of whom may go on to study at Universities specialising in animal, rural and environmental sciences. The plan considers that rural areas are full of enterprise and commits to doing all it can to reduce the regulatory burden, including that of the planning process and by way of local devolution, upon businesses (including the education sector) operating in rural areas so that they can expand.

MAINTAINING BRACKENHURST AS A KEY STRATEGIC SITE

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, which is part of an overarching sustainable growth and development plan. Nottingham Trent University has invested substantially in their Brackenhurst Campus over the past decade to provide an attractive, safe and inspiring working environment for staff, students and visitors alike, in fact the recent Postgraduate Research Experience Survey (2015) identified the highest levels of satisfaction at Brackenhurst across the University. The site is substantial, covering a land area of 206 hectares across the main complex, equestrian centre and home farm sites. As a result of the investment across the site the University has advanced its performance and provision in equestrian science and research capabilities. Alongside this student numbers have increased by over 60% over the past decade. The importance of the work carried out at Brackenhurst in developing, supporting and improving a sustainable rural economy cannot be underestimated – the site is a national centre for rural sciences and education and its work provides far reaching benefits to the wider national rural economy.

With the national trend suggesting that demand for places at our Universities continues to grow among both students from the UK and internationally, there is a requirement in policy to meet these demands and attract new students to the East Midlands and principally Newark & Sherwood as a place to live and study.

The Brackenhurst site is also important for the visitor and at the heart of relevant planning policies should be that the site is a gateway to the rest of the University and enterprise across rural Nottinghamshire. Also essential to the future of the campus is a drive to increase the scope for the site as an educational resource for the wider local population i.e. not just NTU students, both for interactive and more formal occasions.

The rural economy of Newark & Sherwood and particularly the area around Southwell has a good quality of life and is an important source of local tourism and spending power. In particular, in a largely urbanised society, a vital part of supporting the rural economy is educating visitors to a greater awareness and appreciation to of the source and provenance of what we buy and consume, particularly the emphasis on fresh, local, high quality produce.

Through its teaching, research and development capabilities, the Brackenhurst site is central to showcasing this material to the wider public arena. Rural locations are a great source of both planned and spontaneous visits; to combine multiple locations in one given journey. Supporting the Brackenhurst site to attract more people to visit offers a 'shop window' to its activities and its learning and teaching excellence, and in tandem can encourage people to consider a future in the District.

Planning policy has to identify the site as conclusively as it can; to be a platform for the site to continue to be fit for purpose and manage incremental growth in the future; essential conditions for the site, as a rural business, to innovate. In short, and a key point of our submissions, which is already broadly recognised in strategic policy, is that it is absolutely vital that Brackenhurst is able to adapt to a changing world. If it cannot adapt, the substantial and tangible cultural, educational and economic benefits, that it offers the District, will not be properly realised. Development and adaptation will require the improvement and, sometimes, the expansion of facilities within the posiive support of the the overall strategic policy. This will require a positive and supportive lower tier policy framework to ensure a permissive regulatory regime as part of a collectively understood approach.

The desired outcome is deliverable when supported by an effective policy framework; Policy 6 of the Core Strategy is already in place to shape the employment profile of the District, in part by supporting economic development associated with higher education providers. The retention of a similar policy in the Core Strategy Review is supported, but it is also commensurate to the Allocations DPD Review. Part of a future Examination test for the DPD would be that the document is in compliance with an adopted Core Strategy; a policy led framework that links conclusively with Policy SoAP2 or its successor in the Review is the preferential basis upon which the planning process can guide the long term future of the Brackenhurst site.

IMPROVING THE SKILLS BASE AND COLLABORATION

There is a need to continue to develop the site at Brackenhurst as a supportive hub of the rural economy. This not only extends to the wider Newark & Sherwood District, but towards national importance in the high calibre of learning, teaching and the sharing of knowledge it creates, and the graduates that go on to play a part in the rural productivity drive. It is a good indicator of local economic success to have high retention rates of skilled graduates in the surrounding area of a University site, which is why Brackenhurst is so pivotal towards the local economy and rural productivity in general. Newark & Sherwood is a vibrant district with great potential to retain such a skills base.

The Core Strategy's Strategic Objectives are precise in supporting the retention of existing jobs and development of local businesses and developing an improved education base with enhanced learning and training opportunities for local people. Going forward, we would support the review of both the Core Strategy and the Allocations and Development Management Policies DPD in maintaining a clear focus on education as a catalyst for the District's priorities. This is supported within the Integrated Impact Assessment which identifies 'improving access to education facilities' as a key issue.

The Dowling Review recognises that strong, trusting relationships between people in business and the community as a whole with our Universities is the foundation for successful collaboration. In the rural economy, a positive relationship in this context is vital for the University not only to be able to showcase the talent and academic capabilities, but to fully engage with local communities as an asset to the local area, to engender closer ties and ultimately provide students with a greater understanding of how enterprise operates in the District.

Paragraph 5.18 of the Core Strategy states that "in promoting growth and diversification of our local economy, we will work with important learning and training providers serving the district, and support associated employment development. This will improve our education base, increase skill levels over time, and develop a widening range of job opportunities which responds to the 'learning and earning' theme of our Sustainable Community Strategy, and its supporting priorities of raising aspirations and improving accessibility." To achieve such outcomes, a collaborative development partnership between the Council and Nottingham Trent University within the District boundary is essential. The Integrated Impact Assessment framework considers the need to assess education related policies against the aims of increasing qualification levels; improving the skills of the population; improving opportunities for and access to affordable education and training; and, improved facilities

If the academic environment is well supported by the development plan process this would effectively support, incentivise and reward collaborative work with businesses.

SUPPORTING RURAL SCIENCES

There is an ongoing need to develop more sustainable agricultural practices, to ensure the growing population of Britain can be more self sufficient and so productivity and ethical standards in agriculture can be increased further. To help achieve this, planning policies must be supportive and flexible to the rural sciences sector so that there are world class, reputable laboratory facilities to facilitate future ambitions for research, development and innovation. There is a strong link between this need in the built environment and the higher education sector; the root of many

laboratory facilities lies in our Universities. In Newark & Sherwood, the Brackenhurst campus of Nottingham Trent University supports the Animal, Rural and Environmental Sciences sectors with reputable laboratory facilities.

Alongside its core learning objectives, Brackenhurst is a key supporter of innovative, start up, rural science businesses, many of which employ local people and help to further drive local economic growth. The business links identified in the existing strategic policy might be given more definite shape within an allocations policy. The Integrated Impact Assessment identifies the need to 'diversify the employment base of the document particularly in areas which are currently under-represented such as....education', and further that 'high value knowledge based industries and businesses are identified as deficient'

MEETING HOUSING AND ACCOMMODATION NEEDS

Planning policy at a national and local level is increasingly exercised in ensuring that the housing needs of all sectors of society are met against a growing crisis in supply. The distinctive needs of those in full time education are no less important than those of any other sector and policy must respond to the need to meet growth requirements in this area. The Nottingham Outer Strategic Housing Market Assessment (SHMA) 2015 specifically recognises the Southwell rental market as more diverse than others in the housing market area, with a small but growing number of student specific accommodation sites. The potential for those who do not have access to private transport to live in a secure and accessible location in close proximity to their place of study is vital in ensuring that appropriate and sustainable development of the Campus is achieved. Purpose built accommodation which needs the specific needs of those in full time education is essential, but can be sensitive in traditional, established, semi-urban residential locations. As such the potential for accommodation to be located where existing communities do not feel unduly affected by the specific accommodation needs of students will need to be explored to ensure that the wellbeing of communities is maintained. The potential to integrate on site accommodation provision with a balanced provision of off site accommodation will ensure a responsive approach to constraints south of Southwell.

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Impacts of the propose Housing and Employment Targets

Company Organisation

NSK Europe Ltd

Agent Company/Organisation

Planning and Design Group

Comment Reference

PR/IP/0247

Document Section

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Document Subsection

Impacts of the propose Housing and Employment Targets

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Question 8

Support/Object

Comments

The Council correctly expresses a preference in its Call for Sites process for brownfield sites.

Question 8

Impacts of the propose Housing and Employment Targets

Company Organisation

Persimmon Homes

Agent Company/Organisation

RPS

Comment Reference

PR/IP/0110

Document Section

Section 3

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Question 8

Support/Object

Comments

The Council has set out a logical chronological approach to considering the impact of proposed housing targets and the deliverability of current allocations. This includes engagement with site owners and promoters to evaluate the suitability of existing allocations.

As the Council is aware, Persimmon Homes is currently engaged in detailed pre-application discussions in respect of allocation NAP2C Land around Fernwood and is programming a planning application to be submitted in December 2015.

Persimmon Homes controls over 50% of the land included within allocation NAP2C and is preparing a planning application for 1,800 dwellings, a local centre and recreation and open space.

During the preparation of the planning application Persimmon Homes has engaged with all stakeholders and no constraints have been identified to preclude the delivery of the allocation as a whole, or the land controlled by Persimmon Homes. Engagement has also involved the promoters of other parcels of land within the allocation and a comprehensive package of infrastructure is being prepared in partnership with the local planning authority and key stakeholders. This includes Highways England, Nottingham County Council and education and health providers. This will enable the strategic allocation to be realised in full through and within a comprehensive approach to delivery.

The policy requires for a new local centre, primary schools and health facilities. Persimmon Homes is working proactively with service providers and has developed a comprehensive and deliverable masterplan to ensure that the policy requirements of NAP2C are met in full.

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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.

This application process and suite of evidence collated to support the submission demonstrates the deliverability of the existing allocation NAP2C as a whole and that Newark should remain the primary focus for development in the District.

Persimmon Homes is also in control of a site in Sutton on Trent detailed in the Newark & Sherwood Local Development Framework, 'Allocations & Development Management' DPD under Policy ST/MU/1. A planning application was prepared for the site in 2013 and was nearing determination in late 2014 but stalled because of Tidal Trent modelling commissioned by the Environment Agency (EA). Based on the conclusions of the EA modelling Persimmon has at the request of the District Council completed the Sequential Test of the site in accordance with the NPPF, reassessed the flooding issue associated with the site, liaised with statutory consultees and reconfigured the site. The site has been redesigned to accommodate the revised flood plain and remains a policy compliant scheme, with on-site provision of land for 50 dwellings including 15 affordable dwellings, a new village hall, retail unit and additional car parking provided for the adjacent doctor's surgery. Amendments to the planning application will be submitted before the end of 2015. The site is viable and deliverable and should therefore remain as an allocated site within the Local Plan review.

Company Organisation

Rippon Homes

Agent Company/Organisation

Landmark Planning

Comment Reference

PR/IP/0501

Document Section

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Paragraph

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Impacts of the propose Housing and Employment Targets

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Question 8

Support/Object

Comments

Yes, subject to my comments above in relation to Lowdham/Caythorpe.

Company Organisation

William Davis Ltd

Agent Company/Organisation

DEFINE

Comment Reference

PR/IP/0036

Document Section

Section 3

Paragraph

Document Subsection

Impacts of the propose Housing and Employment Targets

Question

Question 8

Support/Object

Comments

William Davis Ltd generally agree with the proposed approach to reviewing the existing development allocations. You will be aware that they have a controlling interest in the “land east of Newark” development site which is allocated in the adopted Core Strategy and expected to deliver in the region of 1600 dwellings.

William Davis are in the process of preparing an outline planning application for the development of the allocation site. The current project programme anticipates that the application will be submitted to the District Council in Spring next year. A review of the development Masterplan is currently underway to take account of the detailed site assessment work that has been completed, and ensure that the development proposals appropriately reflect the site’s current constraints and opportunities.

Whilst that exercise has confirmed the deliverability of the proposed development, the initial plans suggest that the total capacity of the site may well be less than that anticipated in the Core Strategy.

That will be investigated further through the pre-application consultation process that is due to commence with the District Council shortly.

Policy in the Green Belt

Company Organisation

Agent Company/Organisation

Copesticks Ltd

Comment Reference

PR/IP/0466

Document Section

Section 3

Paragraph

Document Subsection

Policy in the Green Belt

Question

Question 9

Support/Object

Comments

We have several sites for housing at Blidworth. The green belt has to be revised in the areas of Cross lane, Blidworth lane and Warsop Lane, To meet future housing needs building will have to take place in what is currently the green belt. See site submission forms sent to planning policy 6/11/2015

Company Organisation

Agent Company/Organisation

Comment Reference

Document Section

Paragraph

Document Subsection

Question

Support/Object

Comments

No, the golden thread running through the NPPF (including its Green Belt policy) is the presumption in favour of sustainable development.

In some cases around the Mansfield Firnge settlements, the most sustainable location for growth is in the Green Belt. This is evidenced by, for example, the most recent allocations for Rainworth included Green Belt land. By arbitrarily ruling-out Green Belt review it is almost certain that less sustainable locations for growth will be allocated.

The five purposes of including land within the Green Belt are all safeguarded by the Development Plan process, considered allocations, by their nature cannot be considered 'unrestricted'.

Our interpretation of the Green Belt policy in the NPPF is that the Local Plan Review mechanism is indeed an appropriate time to review boundaries.

Ensuring a suitable supply of much needed housing in a sustainable location is a sufficiently exceptional circumstance to warrant review, it is the most pressing need across the country, let alone the District.

The NPPF requires Green Belt boundaries to be capable of enduring beyond the Plan Period. This indicates that sufficient allocations should be made and reserve sites identified for flexibility.

Paragraph 84 explicitly promotes the review of Green Belt boundaries through the Local Plan Review Process and the need to promote sustainable

patterns of development. In the event that there are no suitable sites within the target settlement, the Authority must consider the consequences of channelling development to other settlements (where urban capacity is available) inset within the Green Belt, or beyond the Green Belt boundary altogether. The obvious consequence is that such development would not meet the OAN of the target settlement.

NPPF Paragraph 85, bullet 1 confirm this point:

When defining boundaries, local planning authorities should ensure consistency with the Local Plan Strategy for meeting identified requirements for sustainable development.

With regard to Blidworth specifically, the Mansfield Fringe Housing Needs Assessment (Sub Area Report 2014) identified that there is very significant demand from concealed households for new homes in Blidworth. Reducing the allocation for the Village would not, in our view, be consistent with the Authority's obligation to meet the identified objectively assessed need. Rather, the Authority must allocate sufficient land to meet these needs, even if it requires further review of the Green Belt.

Company Organisation

Hollins Strategic Land

Agent Company/Organisation

Nexus Planning

Comment Reference

PR/IP/0043

Document Section

Section 3

Paragraph

Document Subsection

Policy in the Green Belt

Question

Question 9

Support/Object

Comments

We agree that in considering the 'policy on' housing requirement, the Green Belt will act as a constraint on being able to deliver the full objectively identified needs in those areas. However, the Issues Paper does not acknowledge the fact that this need will have to be met elsewhere in the local area, on land not restricted by Green Belt.

The Southwell SHMA Sub-Area lies adjacent to the existing Green Belt, but does not contain Green Belt itself. Given this, it would appear to be the most obvious location to accommodate this unmet housing need, including that from Lowdham and Blidworth and this is a factor that should be given urgent consideration alongside the need to re-consider the spatial distribution of housing allocations, as set out in our response to Question 8.

Question 9

Policy in the Green Belt

Company Organisation

Rippon Homes

Agent Company/Organisation

Landmark Planning

Comment Reference

PR/IP/0502

Document Section

Section 3

Paragraph

Document Subsection

Policy in the Green Belt

Question

Question 9

Support/Object

Comments

The policy of retaining the extent of the current Green Belt around Lowdham (and Blidworth) should not be adopted until a further thorough assessment of potential sites on the edge of those settlements has been carried out. My clients control land at Caythorpe Road which would be appropriate as a Green Belt release to realise the planned growth of the village in the adopted Core Strategy. The site was assessed in the 2010 SHLAA and the conclusion was that it was not suitable yet no significant constraints (other than flood risk, which requires further investigation) were identified. The site could accommodate an appropriate scale of housing for the village (10 dwellings) without significant detriment.

Minor Amendments to Spatial Policies

Question 10

Minor Amendments to Spatial Policies

Company Organisation

Agent Company/Organisation

Copesticks Ltd

Comment Reference

PR/IP/0467

Document Section

Section 3

Paragraph

Document Subsection

Minor Amendments to Spatial Policies

Question

Question 10

Support/Object

Comments

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.

Company Organisation

Agent Company/Organisation

Comment Reference

Document Section

Paragraph

Document Subsection

Question

Support/Object

Comments

Question 10

Minor Amendments to Spatial Policies

Company Organisation

Hollins Strategic Land

Agent Company/Organisation

Nexus Planning

Comment Reference

PR/IP/0044

Document Section

Section 3

Paragraph

Document Subsection

Minor Amendments to Spatial Policies

Question

Question 10

Support/Object

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.

Company Organisation

Mulberry Property Developments

Agent Company/Organisation

Aylward Town Planning

Comment Reference

PR/IP/0012

Document Section

Section 3

Paragraph

Document Subsection

Minor Amendments to Spatial Policies

Question

Question 10

Support/Object

Comments

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.

Question 10

Minor Amendments to Spatial Policies

Company Organisation

Nottingham Trent University

Agent Company/Organisation

Planning and Design Group

Comment Reference

PR/IP/0245

Document Section

Section 4

Paragraph

Document Subsection

Minor Amendments to Spatial Policies

Question

Question 10

Support/Object

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.

Company Organisation

NSK Europe Ltd

Agent Company/Organisation

Planning and Design Group

Comment Reference

PR/IP/0248

Document Section

Section 3

Paragraph

Document Subsection

Minor Amendments to Spatial Policies

Question

Question 10

Support/Object

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.

Company Organisation

Persimmon Homes

Agent Company/Organisation

RPS

Comment Reference

PR/IP/0111

Document Section

Section 3

Paragraph

Document Subsection

Minor Amendments to Spatial Policies

Question

Question 10

Support/Object

Comments

The consultation document sets out minor amendments to Spatial Policies 7,8 and 9. However Persimmon Homes considers that Spatial Policy 6 should also be amended. This sets out that the Council will seek to introduce a Community Infrastructure Levy (CIL) and how it will be used. The policy needs amendment as the Council has already introduced a CIL and therefore is out of date.

The Policy should therefore be amended to reflect this position and also consider a revised set of infrastructure projects that reflect the revised plan period and growth requirements to 2033, including the delivery of current allocations.

Company Organisation

Rippon Homes

Agent Company/Organisation

Landmark Planning

Comment Reference

PR/IP/0503

Document Section

Section 3

Paragraph

Document Subsection

Minor Amendments to Spatial Policies

Question

Question 10

Support/Object

Support

Comments

Addressing Housing Need

Question 11

Addressing Housing Need

Company Organisation

Agent Company/Organisation

Copesticks Ltd

Comment Reference

PR/IP/0489

Document Section

Section 4

Paragraph

Document Subsection

Addressing Housing Need

Question

Question 11

Support/Object

Comments

Yes, in the interests of sustainability and achieving full provision of OAN, sub-area or even specific to settlement targets are appropriate.

Our view is that the affordable housing need should be included as a key driver for the supply of land in the housing trajectory and to ensure full delivery of affordable housing through the housing need figure being reviewed annually with the overall figure, including market homes being driven by the critical need to deliver affordable housing.

Company Organisation

Agent Company/Organisation

Comment Reference

Document Section

Paragraph

Document Subsection

Question

Support/Object

Comments

Question 11

Addressing Housing Need

Company Organisation

Hollins Strategic Land

Agent Company/Organisation

Nexus Planning

Comment Reference

PR/IP/0045

Document Section

Section 4

Paragraph

Document Subsection

Addressing Housing Need

Question

Question 11

Support/Object

Comments

An important part of the Plan review is to reconsider those policies which have become superseded by more up-to-date evidence and as such, we agree that the opportunity must be taken to review those policies within the Core Strategy which set specific targets for type and tenure mix of housing.

We welcome the acknowledgement in the Issues Paper that the type and tenure of housing provision is dependent on many complex factors such as the nature of the proposal, the specific needs of the local area and viability considerations. The proposal to set different targets for affordable housing in different parts of the District is supported in so far as it will allow proposals to respond to these varied circumstances and ensure the plan responds effectively to the needs of different areas. However, the setting of different targets for affordable housing must be based on and have regard to viability evidence to support such changes.

Company Organisation

Minster Veterinary Centre

Agent Company/Organisation

Tetlow King Planning

Comment Reference

PR/IP/0006

Document Section

Section 4

Paragraph

Document Subsection

Addressing Housing Need

Question

Question 11

Support/Object

Comments

CLG Live Table 600 identifies that at 1 April 2014 there were some 3,713 households on the Housing Register for Newark & Sherwood. The Council's Annual Monitoring Reports show that between 2006/07 and 2013/14 a total of 439 affordable homes were delivered at an annual average of just 55 per annum. In fact since 2010/11 annual delivery rates have been falling year on year and have decreased by some 67% in just four years as illustrated below:

- 2010/11 - 92 affordable completions
- 2011/12 - 76 affordable completions
- 2012/13 - 32 affordable completions
- 2013/14 - 30 affordable completions

This should be viewed in the context of the 2009 SHMA and Housing Needs, Market and Affordability Study identifying a need for 558 affordable homes per annum in the district, meaning that the Council has only achieved around 10% of identified requirements on average. It is also of relevance that the October 2015 Outer Nottingham SHMA identifies an annual need for 284 affordable homes per annum based upon a 25% affordability threshold which the Council's recent delivery record also falls way short of achieving.

There is a clear and pressing need for affordable housing within the district and sub-area targets would help to provide greater clarity and certainty on the future delivery requirements across Newark & Sherwood.

The extant Core Strategy requirements and housing targets are not needs driven figures as the 2009 SHMA and Housing Needs, Market and Affordability Study clearly identify levels of need far in excess of the 222 per annum the Core Strategy seeks to deliver. The importance of this is recognised in the High Court Judgement in the case between Satnam Millennium Limited and Warrington Borough Council. In his High Court ruling, Mr Justice Stewart found that the assessed need for affordable housing was 477 dpa and that this assessed need was never expressed or included

as part of the objectively assessed need (OAN). Mr Justice Stewart noted that there was nothing to suggest the proper exercise was undertaken, with him defining this exercise as:

“(a) having identified the OAN for affordable housing, that should then be considered in the context of its likely delivery as a proportion of mixed market/affordable housing development; 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

(b) the Local Plan should then meet the OAN for affordable housing, subject only to the constraints referred to in NPPF, paragraphs 14 and 47”.

In order to assist in achieving the clear identified need for affordable housing within the district the Council should increase the overall housing target for the district across the Plan period. The availability of grant funding for affordable homes has been significantly reduced with the budget for the Homes and Communities Agency 2015-2018 Affordable Homes Programme (AHP) reduced by some 62% since the previous AHP. As a result it is essential that the Council seeks to work closely with the private sector to deliver desperately needed affordable housing in the district through increased overall housing delivery to enable cross subsidy of affordable housing delivery.

The NPPF is clear that planning should be a proactive process to deliver the homes that the country needs. Paragraph 17 states the importance of making every effort to respond positively to growth which meets identified needs taking into account market signals, such as land prices and affordability.

Company Organisation

Persimmon Homes

Agent Company/Organisation

RPS

Comment Reference

PR/IP/0112

Document Section

Section 4

Paragraph**Document Subsection**

Addressing Housing Need

Question

Question 11

Support/Object**Comments**

The consideration of affordable housing policy and evidence set out in the consultation document has been somewhat overtaken by recent Government announcements in respect of affordable housing and the mechanisms to deliver this important aspect of housing need. The consultation paper acknowledges that this information is not available during the drafting of it, but does acknowledge the shift in the Government's agenda to greater home ownership through affordable housing.

Before the Council considers setting sub-district affordable housing targets, viability and providing more detail on the type of new housing is required in the District (and within sub-areas), the authority needs to fully consider the Government's agenda to delivering new housing, and in particular affordable housing, and the impacts of the Government's proposals for registered social landlords delivering affordable housing.

Persimmon Homes therefore considers that the authority should reevaluate the delivery mechanisms for affordable housing and look to mechanisms that can ensure delivery, especially on large strategic sites that are a ket to delivering affordable housing in the District.

While it is accepted that the policy is a long term policy intended to deliver housing over the course of the plan period, the delivery of strategic sites will span for a significant period of the plan period and therefore the framework in which affordable housing is established needs to be responsive to that period, and ensure that delivery is maintained throughout.

In this context, and given that the adopted affordable housing policy was prepared and adopted prior to the NPPF being published and its definition of affordable housing, the review of affordable housing policy should consider the up to date NPPF definition of affordable housing and include a

mechanism to deliver Discounted Open Market Value properties as part of this. It should also be responsive to the Government's agenda with Starter Homes.

It is clear that the Government is making significant moves to increase the affordability of new homes and introducing mechanism to generate greater home ownership through this. The review of the affordable housing policy should therefore embrace these initiatives as part of the policy's evolution to examination.

Company Organisation

Rippon Homes

Agent Company/Organisation

Landmark Planning

Comment Reference

PR/IP/0504

Document Section

Section 4

Paragraph

Document Subsection

Addressing Housing Need

Question

Question 11

Support/Object

Support

Comments

Question 11

Addressing Housing Need

Company Organisation

William Davis Ltd

Agent Company/Organisation

DEFINE

Comment Reference

PR/IP/0037

Document Section

Section 4

Paragraph

Document Subsection

Addressing Housing Need

Question

Question 11

Support/Object

Comments

William Davis Ltd welcome the acknowledgement in paragraph 4.6 that viability is the critical issue in the determination of affordable housing targets and the tenure mix. That has most recently been highlighted in the letter from Brandon Lewis MP to all of the Local Authority Leaders dated 9th November, that seeks to encourage local authorities to act quickly and constructively in renegotiating Section 106 requirements to address viability issues. However, in plan making the key is of course to establish requirements that are deliverable in the first instance (as recognised by para 4.6), and in the case of the proposed strategic developments (at least) that should also take account of the site specific circumstances. That is likely to result in the identification of sub-area affordable housing targets (as noted in para. 4.9), and that approach would be supported.

Addressing Housing Need

Question 12

Addressing Housing Need

Company Organisation

Agent Company/Organisation

Chave Planning

Comment Reference

PR/IP/0075

Document Section

Section 4

Paragraph

Document Subsection

Addressing Housing Need

Question

Question 12

Support/Object

Comments

It is unclear how the Council proposes to address the very important issue of the increase in the number of people aged over 65. It is considered that the Council should make specific provision, on a site allocation basis, for meeting the needs of the elderly in the market and affordable sectors. Policies simply encouraging such provision within general housing development are unlikely to be effective in delivering much-needed accommodation.

Company Organisation

Agent Company/Organisation

Comment Reference

Document Section

Paragraph

Document Subsection

Question

Support/Object

Comments

Yes, at least, to set out what type (size) of affordable housing is required, which will provide more transparency for developers. Requiring specific size requirements for market homes is not entirely realistic; developers will have market data to demonstrate that what they are proposing to build is what is in demand.

Company Organisation

Agent Company/Organisation

Comment Reference

Document Section

Paragraph

Document Subsection

Question

Support/Object

Comments

Company Organisation

Hollins Strategic Land

Agent Company/Organisation

Nexus Planning

Comment Reference

PR/IP/0046

Document Section

Section 4

Paragraph

Document Subsection

Addressing Housing Need

Question

Question 12

Support/Object

Comments

Notwithstanding the comments above, in relation to Question 11, we would urge the Council not to be too prescriptive about housing type and mix within the new policy document. To do so might make any such policy vulnerable to becoming quickly out-of-date as new evidence about required mix emerges. It is also unlikely to be consistent with paragraph 50 of the Framework which states policies in relation to housing mix should be sufficiently flexible to take account of changing market conditions over time.

A policy which is overly specific about required housing mix in new development would fail to recognise the site specific nature of the proposals and could hinder the ability of an applicant and the Council to work together and agree the most appropriate provision for any given proposal with regard to location, the nature of the scheme, viability and the ever evolving local housing need position.

A robust approach would be the requirement for proposals to respond to the need identified in the most up-to-date evidence, with a recognition in the policy (as in the adopted Core Policy 3) that mix will be dependent on the local circumstances of the site and prevailing local need.

Question 12

Addressing Housing Need

Company Organisation

Minster Veterinary Centre

Agent Company/Organisation

Tetlow King Planning

Comment Reference

PR/IP/0007

Document Section

Section 4

Paragraph

Document Subsection

Addressing Housing Need

Question

Question 12

Support/Object

Comments

The Council must consider a policy response to the need to deliver Custom Build housing. The Core Strategy makes no provision for Custom Build housing and the issues and options consultation for the Plan Review also fails to take account of the need to address this. Research undertaken by Ipsos Mori in Spring 2015 found that 13% of the adult population were researching how to commission their own home at any given time, but that only around 10,000 per annum actually succeed. This mismatch is why the Government set a target of 100,000 Custom build homes to be delivered in its 2011 Housing Strategy, backed by commitments in the National Planning Policy Framework. Custom Build schemes can be delivered on larger sites with examples including sites of 100+ homes in Nottingham and a 1,900 home development in Bicester. The Government has legislated to introduce a 'Right to Build' which is anticipated to become operational in 2016. This will require Councils to assess demand for Custom and Self Build and have regard to this demand in the allocation of suitable land.

Company Organisation

Rippon Homes

Agent Company/Organisation

Landmark Planning

Comment Reference

PR/IP/0505

Document Section

Section 4

Paragraph

Document Subsection

Addressing Housing Need

Question

Question 12

Support/Object

Comments

Yes, provided the figures are used as guides for development rather than prescription. In some higher value areas of the District, there will be a greater demand for larger (4+ bedroom) dwellings -it is important that developers can deliver the new housing required in the District without being overly constrained by such an approach.

Question 12

Addressing Housing Need

Company Organisation

William Davis Ltd

Agent Company/Organisation

DEFINE

Comment Reference

PR/IP/0038

Document Section

Section 4

Paragraph

Document Subsection

Addressing Housing Need

Question

Question 12

Support/Object

Comments

William Davis would be concerned if the proposed policy in relation to housing mix was unduly prescriptive. The Issues Paper refers to the Housing Market and Needs Assessment (HMNA) that has concluded that the policy should require a market mix of 50% 1 & 2 bed dwellings and 50% 3 & 4 bed dwellings. That requirement would potentially have significant implications for the viability of strategic sites that needs to be carefully considered.

Moreover, whilst the assessment sets out the findings of a significant postal survey, the results are clearly only a reflection of need and demand at that specific point in time, and the demand for particular types of housing will clearly vary throughout the plan period, notably in response to economic activity and well-being.

Notwithstanding that, the conclusion appears to be largely based on housing need rather than demand, which the NPPF clearly states (2nd bullet para 50) is the key consideration when identifying “the size, type, tenure and range of housing that is required”. Indeed, the difference between need and demand is acknowledged within the analysis in the HMNA (Section 10). For example, in relation to existing households nearly 72% of demand is for properties with 3 or more beds (table 10-3). Even in relation to concealed households (which make up a much smaller element of housing need), the evidence highlights that the demand for 3 or more bed properties is much greater than the need (table 10-9). This is not unsurprising as the benefits to households of having more flexible living accommodation in both the short and long terms are clear, and ultimately more sustainable if it means that residents can stay in their home if their household grows or their circumstances change.

The localised evidence in relation to the existing housing stock and demographics and the influence that has on housing need and demand referred

to in the Issues Paper (para. 4.7) is also noted. That indicates that the demand within the market sector for 3 or more bed dwellings in the Newark area is approximately 62%. That is clearly much higher than the suggested policy position and in that respect a sub-area based approach would be more appropriate to ensure that housing provision appropriately reflects housing demand.

Pitch Requirement and Provision

Question 13

Pitch Requirement and Provision

Company Organisation

Agent Company/Organisation

Comment Reference

Document Section

Paragraph

Document Subsection

Question

Support/Object

Comments

Future Assessment of Need

Company Organisation

Agent Company/Organisation

Comment Reference

Document Section

Paragraph

Document Subsection

Question

Support/Object

Comments

Location of Future Pitch Provision

Question 15

Location of Future Pitch Provision

Company Organisation

Agent Company/Organisation

Copesticks Ltd

Comment Reference

PR/IP/0472

Document Section

Section 4

Paragraph

Document Subsection

Location of Future Pitch Provision

Question

Question 15

Support/Object

Support

Comments

Pitch Definition and Size

Company Organisation

Agent Company/Organisation

Copesticks Ltd

Comment Reference

PR/IP/0473

Document Section

Section 4

Paragraph

Document Subsection

Pitch Definition and Size

Question

Question 16

Support/Object

Support

Comments

Tolney Lane

Company Organisation

Agent Company/Organisation

Comment Reference

Document Section

Paragraph

Document Subsection

Question

Support/Object

Comments

Retail and Town Centre Uses

Question 18

Retail and Town Centre Uses

Company Organisation

Agent Company/Organisation

Copesticks Ltd

Comment Reference

PR/IP/0491

Document Section

Section 4

Paragraph

Document Subsection

Retail and Town Centre Uses

Question

Question 18

Support/Object

Comments

Yes, in principle, the level of retail growth should reflect the proposed residential and employment growth and be distributed to ensure that it supports the overarching growth strategy, however, we would not immediately support the reduction in overall growth, given the housing need figures that follow a period of high housing targets.

Company Organisation

Agent Company/Organisation

Copesticks Ltd

Comment Reference

PR/IP/0475

Document Section

Section 4

Paragraph

Document Subsection

Retail and Town Centre Uses

Question

Question 18

Support/Object

Support

Comments

Company Organisation

Agent Company/Organisation

Grace Machin

Comment Reference

PR/IP/0380

Document Section

Section 4

Paragraph

Document Subsection

Retail and Town Centre Uses

Question

Question 18

Support/Object

Comments

4.32 The Convenience and comparison retail targets contained within the Core Strategy were informed by the 2009 Retail and Town Centre Study; by the time the Allocations and Development Management DPD was being prepared the Council took further advice on the matter.

The current targets are :

4.33 Any new retail capacity targets will be directly related to the levels of growth being planned for through the housing and employment targets. Therefore a reduction in growth is likely to result in a lesser scale of new retail being required.

Accordingly to guide the review of existing and the setting of new retail capacity targets an update to the Retail and Town Centre Study will be carried out.

4.34 Core Policy 8 'Retail Hierarchy' and Policy DM11 'Retail and Town Centre Uses' which provide the local planning policy against which proposals for retail and other town centre uses are considered. Core Policy 8 defines a 'retail hierarchy'...

District Centres - Primarily used for convenience shopping, with some comparison shopping they also provide a range of other services for the settlement and surrounding communities - SOUTHWELL

4.35 Retail proposals outside of the centres are strictly controlled with those creating more than 2500 sq m (circa 27,000 sq ft) of floor space

requiring justification through a sequential test and robust assessment of impact on nearby centres.

4.36 ...it is proposed that the Retail Hierarchy will remain broadly unchanged...the Retail and Town Centre Study will however review and make recommendations over the status of Centres within the hierarchy and the extent of Centre boundaries and frontage designations. As detailed in the table below there is a need to amend the sequential approach set out above to bring it in line with the NPPF.

The review will consider any new retail capacity targets..and the existence of potential new sites (my emphasis)

Question 18

Retail and Town Centre Uses

Company Organisation

Mulberry Property Developments

Agent Company/Organisation

Aylward Town Planning

Comment Reference

PR/IP/0013

Document Section

Section 4

Paragraph

Document Subsection

Retail and Town Centre Uses

Question

Question 18

Support/Object

Comments

In the first instance, we confirm our understanding that the figures included within the table at paragraph 4.32 are drawn from the adopted Plan and that is modelled largely from a household survey undertaken prior to the opening of the Potterdyke development. Clearly there have been substantial changes in the wider economy and shopping habits which we presume will be considered as empirical evidence to inform an update to the Retail and Town Centre Study.

Secondly, we would identify that whilst this process will result in given capacity figures for new development (and perhaps to be directed on a spatial basis) this should not be understood as a cap on development. If the evidence base work identifies qualitative deficiencies arising from overtrading or spatial gaps in provision that should be given weight, and consideration had as to how that might be remedied and assessed accordingly.

In terms of the Settlement Hierarchy, we agree with the proposed hierarchy and the role and functions had by each centre under each designation.

We understand that new Local Centres are identified as part of the Strategic Growth sites promoted by the Plan process. These will provide retail facilities and other services to meet local needs as and when they arise. Should there be an aspiration for the phasing of their delivery to be accelerated (prior to the point where they can be regarded to meet purely local needs) then that should be subject of SEA and assessed in retail impact terms.

The development management process will have regard for the advice of the Plan in terms of new floorspace requirements but should afford more

weight to the relevant NPPF policies focusing on impact and the sequential approach to site selection. Whether a development proposal would result in more floorspace being delivered than is set out by a capacity analysis or not, its acceptability in planning terms should be more squarely focused upon whether it would result in significant adverse impacts and/or passed the requirements of the sequential approach.

In terms of out-of-centre development there is a reference at paragraph 4.35 to a floor threshold (2500 sq m) beyond which sequential and impact assessment would be required. For clarity, we would point out that the NPPF requires sequential assessment without reference to a floorspace threshold.

Finally, there is reference at paragraph 4.35 to the need to take account of and support the viability of a number of town centre characteristics. It will be important for the Council to clarify how these characteristics will be measured, and undertake a benchmarking assessment and agree a programme for those indicators to be assessed over time to demonstrate any change arising.

Question 18

Retail and Town Centre Uses

Company Organisation

NSK Europe Ltd

Agent Company/Organisation

Planning and Design Group

Comment Reference

PR/IP/0249

Document Section

Section 4

Paragraph

Document Subsection

Retail and Town Centre Uses

Question

Question 18

Support/Object

Comments

We consider that the Council's approach to retail and town centre uses, focuses too greatly on traditional notions of floorspace calculations being translated into allocations and gives insufficient regard to emerging formats, and the need to consider flexibility in delivering mixed use, regeneration schemes in an increasingly challenging economy.

It is recognised that traditional approaches to identifying retail floorspace requirements could be affected by alterations to population growth estimates. However, the Issues document also recognises that retail habits and formats are changing, and that the retail environment has become increasingly challenging and competitive in both the convenience and comparison good sectors

Further, it must also be recognised that in respect of Policy NUA/MU/3 the retail floorspace has already been considerably compromised as a result of the Northgate appeal. There is a bigger picture with regard to NUA/MU/3 in that it comprises a regeneration objective of strategic importance, and is a truly mixed use allocation.

The precise mix and balance of uses will need to be market responsive in order to maximise site values, which will be necessary in effectively generating sufficient value to retain / relocate core business elements of NSK within Newark. While it is acknowledged that the needs of retailing are changing, the regeneration policy and the economic growth aims of NSK in Newark require maximum flexibility in order to ensure that the regenerative aims of policy can be delivered. It would be premature and unduly restrictive, not to mention counter to the economic growth aims of the NPPF, to seek to further reduce or limit the potential of Policy NUA/MU/3 to develop responsively.

In respect of retail changes, online retailing and the click and collect format are increasing. Comparison goods stores are increasingly blurring the line between logistics and retail display space, providing for an increased warehoused range, with retail floorpace being primarily a showroom.

When considering the amount of retail expenditure growth and how this can be quantified into floorspace, an orthodox approach is used by planning professionals for the retail industry.

The floorspace and sales density figures for new retail display / logistics uses associated with the distribution of retail goods will not directly reflect average sales densities for traditional retail based floorspace. Clearly display floorspace needs to display goods for the public, provide customer circulation space and stack goods at reachable levels. This would suggest display retail floorspace is likely to be less efficient when it comes to the storage of goods. Extending the range of goods sold through warehoused click and collect formats, will increase floorspace needs albeit at and much more efficient density. For big box retailers, which typically accommodate larger physical goods, lower sales densities are often applied (i.e. £1,500 to 3,000 per sq m).

The floorspace needs of this emerging retail format are yet to be fully established, and it would be incredibly shortsighted and unduly restrictive to seek to reduce potential retail floorspace based on traditional, pre-internet, retailing formats and expressions of retail need. While high streets reorientate to specialist sectors, artisan goods, local sourcing, leisure and housing uses, large format retail will become even more important in meeting a new, more sustainable pattern of shopping where goods collected from or delivered from a warehouse / showroom use. Any revised policy must take account of the distinct but complementary retail and office markets, rather than automatically taking the outdated view that out of centre retailing directly and negatively harms the traditional high street.

Further, it should be noted that the 'polarisation trend' is a significant and long-term trend which has been taking place in UK retail in recent years, and is expected to continue in the short to medium term. It refers to the preference of retailers to concentrate trading activities in larger schemes, within larger centres. The 'polarisation trend' is also driven by customers, who have become more discerning and are increasingly prepared to travel further afield. There is therefore a concentration of comparison goods expenditure in a smaller number of larger centres. This concentration of retailing activity poses challenges for the medium centres, and if Newark is to retain its role and function in the retail hierarchy and avoid losing a substantial part of its economy, it needs to ensure the potential is deliverable.

Evidence from Experian notes that it considers that 'whilst it is understandable that the challenge to traditional store-based shopping will continue to grow strongly, a number of crucial factors temper this threat', which can be summarised as follows:

- Many stores sell online but source these sales from regular stores, rather than warehouses, implying an increased requirement for store floorspace to cater for increasing online sales;
- Store-based shopping is still expected to expand at an annual average of 1.9% per annum in per capita terms to 2030;
- Sales via online shopping will begin to grow less rapidly as the market becomes more 'mature', particularly in sectors such as music, DVD and e-books;

- 'Click & Collect' will be the main driver of current and future internet growth - this also requires a 'bricks and mortar' presence in easily accessible locations however; and
- 'Bricks and mortar' stores are increasingly acting as 'showrooms' for products, service locations, and collection / drop-off points for online shopping orders. Stores therefore form part of a retailer's 'multi-channel' strategy, and can actually drive demand for traditional outlets.

12 of the 20 top online retailers have a physical store presence, and it is notable that even a previously, entirely online retailer - Amazon - has now opened its first 'bricks and mortar' shop - <http://www.theguardian.com/technology/2015/nov/03/amazon-books-seattle-store-opened-university-village>

The GVA Grimley 'Newark and Sherwood Retail and Town Centres Study' identifies that future retail demand in Newark is based on meeting comparison good retail requirements, and preventing the leakage of bulky goods retail trade out of Newark. It also identifies that existing out-of-centre retail warehouse provision at Beacon Hill Retail Park i.e. B&Q and Topps Tiles is in close proximity to Newark town centre.

This retail model will continue to rely heavily on clustering together in locations where they can achieve critical mass. Not only do customers want low prices and easy access to retailers at the one location, they will also demand sufficient parking facilities so they can travel by car and transport goods home themselves. Without this critical mass and without suitable access and segregated vehicle movements, trade will continue to be lost to other centres.

Consideration to public safety is of primary importance in all bulky goods retail developments. Customer transport needs plus the regular goods transport, loading and unloading requirements mean infrastructure must be designed around constant large as well as smaller vehicle use.

As such it is not a case of the plan relying on one site, it is a case of one site being the most suitable and deliverable format to provide for the specific type and nature of retail provision identified through the plan period.

Mixed use site NUA/MU/3 provides for a comprehensive, mixed regeneration scheme including commercial office and business space, around 150 new dwellings and approximately 10,000 sq m of bulky goods retail space over the plan period. The site is currently in use by NSK Europe Ltd and has been a manufacturing site for many decades.

Over a period of over ten years, NSK has engaged with the Council over its requirement to relocate to a purpose built, clean production, manufacturing plant. NSK Europe Ltd is one of Newark's biggest employers (c400, October 2011) and the production and design of precision bearings has taken place on its site at Northern Road for well over a century. The company is a key manufacturer of high tech, precision engineered components and has a growing research and development arm, taking advantage of the town's ability to attract and retain a highly skilled labour force of engineers.

Over the years however, much of the more standard manufacture has moved overseas, while the site retains a built legacy of heavy manufacturing

production from a different century. The factory buildings have been maintained, but are unsuited to current manufacturing needs; are a significant maintenance liability; are unsightly; are underutilised; and, have poor circulation space. As such, much of the site is quantitatively and qualitatively defunct and cannot operate with total efficiency. The work taking place in part of the site today has the potential to employ more people within significantly smaller floorspace and within much more energy efficient buildings. NSK are fully committed to Newark in the long-term. Their requirement and relocation programme is to secure a suitable (green/brown-field) site elsewhere Newark and construct a purpose-built operation, funded through the release of the Northern Road works for mixed use re-development. It seems increasingly likely that, a relocation could see early development within one of the SUE employment areas, ensuring built in sustainability to the town's key growth locations.

This 'bigger picture' and the need to maximise opportunity and flexibility needs to be considered in any further adjustment to floorspace requirements

Company Organisation

Agent Company/Organisation

Comment Reference

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Question **Support/Object**

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Wind Energy Development

Company Organisation

Agent Company/Organisation

Copesticks Ltd

Comment Reference

PR/IP/0476

Document Section

Section 4

Paragraph

Document Subsection

Wind Energy Development

Question

Question 19

Support/Object

Support

Comments

Company Organisation

Agent Company/Organisation

Comment Reference

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Paragraph

Document Subsection

Question

Support/Object

Comments

No, the Council should be more proactive in identifying areas for wind energy, the political approach of the current government to wind energy may not last more than 3 years beyond the adoption of the Review and the Government's approach is not consistent with European or UN policies on Climate change.

We would suggest that suitable areas (technically) are identified and the policy states that the suitability of proposals will be considered in the context of the prevailing National Planning Policy.

Minor Amendments to Core Policies

Company Organisation

Agent Company/Organisation

Comment Reference

Document Section

Paragraph

Document Subsection

Question

Support/Object

Comments

Company Organisation

Bourne Leisure Ltd

Agent Company/Organisation

Nathaniel Lichfield and Partners

Comment Reference

PR/IP/0001

Document Section

Section 4

Paragraph

Document Subsection

Minor Amendments to Core Policies

Question

Question 20

Support/Object

Comments

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.

Company Organisation

Bourne Leisure Ltd

Agent Company/Organisation

Nathaniel Lichfield and Partners

Comment Reference

PR/IP/0002

Document Section

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Document Subsection

Minor Amendments to Spatial Policies

Question

Question 20

Support/Object

Comments

Transport and Accessibility
In terms of policies for transport and accessibility, the review of the Core Strategy should acknowledge that whilst existing Spatial Policy 7: Sustainable Transport encourages and supports development proposals which promote an improved and integrated transport network and an emphasis on non-car modes, in the case of tourism uses, access by private car may be the only feasible option, particularly for more remote locations, and this should be recognised in any revised transport policy.

Company Organisation

Bourne Leisure Ltd

Agent Company/Organisation

Nathaniel Lichfield and Partners

Comment Reference

PR/IP/0003

Document Section

Section 4

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Document Subsection

Minor Amendments to Spatial Policies

Question

Question 20

Support/Object

Comments

Historic Environment
Adopted Core Policy 14: Historic Environment recognises that Newark & Sherwood has a rich and distinctive historic environment and seeks to preserve and enhance the character, appearance and setting of the District’s heritage assets and historic environment. Bourne Leisure considers, however, that policies arising from the current review should also acknowledge the important contribution that heritage assets make to the visitor economy in the District. The Review should acknowledge that income from tourism can assist in the conservation of key heritage assets, including the use of historic buildings for hotels. Policies for the historic environment should therefore allow for enabling development and for the sensitive alteration and expansion, refurbishment and re-use of disused or under-used buildings of some historic or architectural merit for tourism use including accommodation, where it would not materially harm the heritage value of the asset or its setting, and where it will secure the long term future of the asset.

Company Organisation

Mulberry Property Developments

Agent Company/Organisation

Aylward Town Planning

Comment Reference

PR/IP/0014

Document Section

Section 4

Paragraph

Document Subsection

Minor Amendments to Core Policies

Question

Question 20

Support/Object

Comments

We are in general agreement with the minor amendments suggested in topic form, albeit that we reserve the right to comment further subject to the wording which would be carried through with particular reference to CP6 and CP8.

Company Organisation

Nottingham Trent University

Agent Company/Organisation

Planning and Design Group

Comment Reference

PR/IP/0246

Document Section

Section 4

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Minor Amendments to Core Policies

Question

Question 20

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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.

Reviewing Core Policies

Company Organisation

Agent Company/Organisation

Comment Reference

Document Section

Paragraph

Document Subsection

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Support/Object

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Company Organisation

Agent Company/Organisation

Comment Reference

Document Section

Paragraph

Document Subsection

Question

Support/Object

Comments

Company Organisation

Hollins Strategic Land

Agent Company/Organisation

Nexus Planning

Comment Reference

PR/IP/0047

Document Section

Section 5

Paragraph

Document Subsection

Reviewing Core Policies

Question

Question 21

Support/Object

Comments

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.

Company Organisation

NSK Europe Ltd

Agent Company/Organisation

Planning and Design Group

Comment Reference

PR/IP/0250

Document Section

Section 5

Paragraph

Document Subsection

Reviewing Core Policies

Question

Question 21

Support/Object

Support

Comments

Question 21

Reviewing Core Policies

Company Organisation

Persimmon Homes

Agent Company/Organisation

RPS

Comment Reference

PR/IP/0114

Document Section

Section 5

Paragraph

Document Subsection

Reviewing Core Policies

Question

Question 21

Support/Object

Comments

Persimmon Homes is currently preparing a planning application for allocation NAP2C 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 comprehensibly, the 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 requirements 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.

Question 21

Reviewing Core Policies

Company Organisation

Rippon Homes

Agent Company/Organisation

Landmark Planning

Comment Reference

PR/IP/0506

Document Section

Section 5

Paragraph

Document Subsection

Reviewing Core Policies

Question

Question 21

Support/Object

Comments

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.

Additional Comments

Additional Comm**Additional Comments**

Company Organisation**Agent Company/Organisation****Comment Reference****Document Section****Paragraph****Document Subsection****Question****Support/Object****Comments**

It is clear that for NSDC to meet future developmental needs, land that is currently in green belt has to be developed, without a thorough green belt review future housing needs cannot be met. (this would apply to most districts through out the country)

Most people only move about five miles from their place of birth, on average and therefore most villages need to allocate development in relation to the amount of demand / size of that village. This would have a major benefit in that most villages would get a little bigger and avoid building thousands of houses as is suggested at Newark which would be of no benefit as is the case for residents at Blidworth and Rainworth as most people wish to live in close proximity to their existing families. Blidworth and Rainworth are well situated in terms of good transport links to Nottingham, Mansfield and even as far as Sheffield. Houses in these locations would cost below the national average and would be a good base to connect to these service centres. Development at Newark is well served by rail but access onto the A1 limits opportunities which are located in the centre of the UK and linked by the M1. Rainworth and Blidworth are well connected via the M1, A614 / A1M, the Robin Hood rail line, Nottingham tram. The proposed HS2 station at Toton would be less than 30 mins by car giving quick access to London and Leeds.

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Additional Comments

Company Organisation

Mulberry Property Developments

Agent Company/Organisation

Aylward Town Planning

Comment Reference

PR/IP/0508

Document Section

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Comments

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Comments

We have set out detailed comments in respect of employment land matters and retail policy matters.

We have also separately identified a specific land parcel (former highways depot at Kelham Rd, Newark) which is currently subject of an employment land allocation. We consider it appropriate that this allocation is withdrawn as evidence has been accepted by the Council (in the light of a planning application for a supermarket development) that there are no reasonable prospects of the site coming forward for employment uses.

In addition, we would seek for it to be identified for retail uses in line with the development management proposal currently under consideration by the local planning authority. It is noted that the site is out-of-centre in strict NPPF terms and we would not seek any specific allocation as a defined centre.

Finally, we would confirm that we have compiled substantive evidence in terms of shopping patterns and we would be happy for the Council to use that information as part of their evidence base for the Plan-making process.

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Additional Comments

Company Organisation

Rippon Homes

Agent Company/Organisation

Landmark Planning

Comment Reference

PR/IP/0507

Document Section

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Additional Comments

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Comments

It is noted that the 2010 SHLAA for the site referred to at Caythorpe Road, Lowdham was assessed as being suitable in terms of all of the factors listed in the Suitability category but found to be unsuitable as a whole. Similarly, the site was considered available with no other constraints. it should also be noted that the development of the site had the support of Caythorpe Parish Council.