Bolsover District Council

Local Plan Steering Group

Date of Meeting 25th January, 2016

Report on the Proposed Vision for the Local Plan for Bolsover District

Report of the Joint Assistant Director of Planning and Environmental Health (Written by Planning Policy Manager)

Purpose of the Report

- To provide a summary of the responses made in the recent consultation on the proposed Vision for the Local Plan for Bolsover District.
- To provide a summary of the findings of the independent Sustainability Appraisal of the Vision.
- To advise members of the next steps in the development of the Vision.

1 Report Details

Background

- 1.1 One of the topics consulted on in the recent public consultation was the 'Vision' for the Local Plan. The Vision sets out what the Local Plan for Bolsover District aims to achieve, and how the district will be in 2033.
- 1.2 This report contains a summary of the representations made to the Vision together with a summary of how the Vision performs against the Objectives set out in the independent Sustainability Appraisal

Consultation Responses

- 1.3 Few verbal comments were made on the Vision at the eight 'drop-in' sessions in the district.
- 1.4 A total of 61 written comments were received on the Vision. Whilst most were supportive, some of the support was conditional on various changes to the wording. It should be noted that not everyone supporting or objecting to the Vision gave a reason for doing so. A number of respondents made similar overarching points in relation to both the Vision and the Objectives.
- 1.5 To reflect government guidance¹, the Vision was split into three sections to reflect the roles the planning system is expected to perform, and which form the three dimensions to sustainable development:
 - An Economic Role:

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¹ As set out primarily at paragraph 7 of the National Planning Policy Framework

- A Social Role; and,
- An Environmental Role.
- 1.6 Comments received referred either to the Vision as a whole or to a specific dimension, and the section below has been structured to reflect this.

Overarching Comments

- 1.7 In terms of comments made in respect of the Vision as a whole most responses were supportive. Reasons given for supporting the Vision included:
 - that the Vision was compliant with national guidance;
 - that the vision was split into the three dimensions of sustainable development;
 - that the vision makes clear that the economic development, employment and housing needs of the district will be met in the future;
 - that the delivery of sustainable development, particularly through the delivery of a range of new homes in the most sustainable towns was welcomed;
 - that the Vision's positive aspiration was supported;
- 1.8 General comments made on the Vision as a whole included:
 - that the district needs some stimulation and a Vision going forward;
 - that the protection of heritage assets is welcomed;
 - that short amounts of regular brisk walking can markedly improve health and plans should be designed around sustainable travel and walking communities;
 - that it is important that the natural and built environment is preserved and enhanced:
 - that the overall Vision is suitably focussed on improving the local economy, but with consideration of the broader impact of development;
 - that a full appraisal of the now almost certain impact of the known 14M high embankment of HS2 needs a non parochial inter-authority approach;
 - that reference to Bolsover being 'a growing district' should be qualified by adding 'within infrastructure constraints';
 - that reference to Bolsover undergoing a visual transformation should be qualified by adding 'whilst safeguarding important local environments;
 - that more emphasis is needed on the protection of community buildings; that the distinctiveness and history of local built environments should be supported by the plan;
 - that a new shopping centre should be added (Shirebrook?); that cleanliness should be improved (Shirebrook?);
 - that more businesses would make the area self contained with less out commuting by residents;
 - that whilst the vision references the provision of new social infrastructure and this is clearly supported, there is an underlying requirement to support existing social infrastructure such as local shops and community facilities which continue to close as a result of rural decline and a lack of growth to maintain their viability.
- 1.9 Objections to the Vision as a whole were:

- that the Vision is over reliant on the remediation and development of brownfield sites for housing, and that an overreliance on previously developed land (brownfield) sites will result in further under delivery and a failure of the strategy. Part of the solution to this would be to review the Green Belt in areas such as Barlborough to allow the release of new housing in viable and sustainable locations:
- that the Plan makes no mention of a Green Belt Review;
- that the Vision appears to be focussed on new and growing employment opportunities, whilst neglecting established employers;
- the Vision does not fully address the issue of decline in the medium and smaller settlements:
- that it is crucial to spell out in the headline vision what sustainable patterns are and what they are not - the vision must promote and define walkable settlements as the only acceptable from of sustainable development;
- that no attention seems to be focused on the destruction of green field sites and agricultural land which again seems to be pandering to developers and not residents:
- that the Local Plan should encourage farmers to plant allergen producing crops away from settlements;
- that increased open spaces and increased housing are mutually exclusive.
 The ideas of incorporating a little green oasis in the middle of housing development will not work

 people need more than this;
- that whilst the overall vision is supported, the Council needs to be more ambitious with regard to boosting economic development and with this will come the need for more houses to serve raised economic activity. Whilst environmental principles cannot be sacrificed in the pursuit of unsustainable development the Council will need to be ambitious if it is to maximise its economic potential:
- that reference should be made to safeguarding the following natural capital assets: air and air quality protection; water resources provision concern; minerals assets safeguarding; soil and agricultural asset safeguarding.

The Economic Role

- 1.11 In terms of the economic role set out in the Vision, the main reasons given in support were: more businesses would make the area self contained, reducing out commuting by residents, and increasing spending power; and that it would support the remediation of brownfield sites.
- 1.12 The main comments on the economic role were: that safeguards should be applied to tourist development in the proximity to Rough Close works in the interest of health and safety; the Vision should refer to economic regeneration to create and support low carbon sustainable jobs based around green technologies; that reference should be made to supporting and facilitating growth for existing employers in the area.

The Social Role

1.13 In terms of the social role set out in the Vision, the main reasons given in support were: that new infrastructure will have been planned and delivered at the same time as new developments; 1.14 The main comments on the social role were: that the role that new development (housing growth) can play in supporting existing infrastructure and sustainability should be explicitly identified under the Social Role; that a reference to community health and the importance of access to the natural environment as part of a healthier population should be included; that the need for housing should be qualified by referring to 'in appropriate locations'; that the social role of the vision should be expanded to reflected a positive approach to regeneration; that the social role be expanded to support local services and facilities at risk by introducing new measures, including housing growth to maintain and support their essential role in their communities.

The Environmental Role

1.15 In terms of the environmental role set out in the Vision comments were: that a specific reference should be made to trees and woodland given their potential role in carbon sequestration, shading, and increased contribution to flood alleviation;

Comments from Specific Consultation Bodies

- 1.16 **Derbyshire County Council** state' The Economic and Social Role sections are supported as these make appropriate reference to the fact that the economic development, employment and housing needs of the District will be met in the future and that new infrastructure, such as schools, roads and health facilities will have been planned and delivered at the same time as new developments. It is of concern, however, that no mention is made in the Vision of the aim that the principle of the North East Derbyshire Green Belt will have been maintained and that it will have been protected from harmful development. The lack of reference to, and consideration of, the Green Belt is a key concern generally'.
- 1.17 **The Environment Agency** considers that the vision has identified the main environmental issues and opportunities for the District. However, they feel that it could be much more ambitious and bolder in terms of the improvements to the natural environment that will be achieved by 2033. They consider that the Vision could be bolstered by a number of (mainly) minor amendments to its wording, and a couple of new paragraphs under the Environmental Role. The two new proposed paragraphs would refer to protecting rivers and waterbodies to improve their ecological status, and the incorporation of Sustainable Drainage Systems (SuDS) in new developments to help the district become more resilient to climate change.
- 1.18 **Historic England** welcomes the reference to the protection of heritage assets in the draft vision.
- 1.19 The Local Nature Partnership state that the Vision has been thoughtfully considered and partitioned into the three aspect of sustainability, and that they welcome this approach. However, they consider that the Environmental role excludes key natural capital safe-guarding, and request that reference is made to safeguarding the following assets to support the economy and social aims: mineral assets; soil, agricultural assets (agricultural land classification grade 1/2); water resource/provision; and air and air quality safeguarding)

1.20 **Rotherham Metropolitan Borough Council supports** the proposed Local Plan Vision, and in particular welcomes the recognition of the role that the District plays as part of the wider City Region.

Sustainability Appraisal

- 1.21 Members will be aware that the Sustainability Appraisal process is one of the legal tests for plan making. It is intended to be iterative with the findings of the Appraisal considered at key stages so that this informs the preparation of a Local Plan. The Council will be tested on its compliance with this legal test by an inspector at the Local Plan Examination.
- 1.22 Since the Steering Group last considered options for a Vision for the Local Plan at their meeting on 25th September an initial Sustainability Appraisal Report has been prepared (October 2015), which has assessed the compatibility of the Vision with the 15 objectives set out within the Sustainability Appraisal.
- 1.23 The Vision has been assessed as being compatible with the majority of the Sustainability Appraisal objectives. However, the Vision does leave room for uncertainties as potential conflicts could arise between growth, resource use and environmental factors. The effects are highly dependent on whether growth is achieved under consideration of economic, social and environmental sustainability and in this regard, the appraisal recommends that the Vision places more explicit emphasis on the promotion of sustainable development as an underpinning theme.
- 1.24 Given these uncertainties the Sustainability Appraisal recommends that the Vision places more explicit emphasis on the promotion of sustainable development as an underpinning theme. Additionally, it is considered that the Vision could usefully make specific reference to:
 - the sustainable use of resources and minimisation of waste:
 - locating development in accessible locations that reduce the need to travel;
 - climate change mitigation and adaptation, including the promotion of renewable energy sources; and
 - supporting regeneration and tacking deprivation.

2 Conclusions and Reasons for Recommendation

2.1 The development of the Vision is an iterative process, and it is proposed that it will be refined as the Plan is developed. Whilst most of the responses were supportive of the Vision, there is scope to amend the wording of the Vision moving forward to take account of some of the issues raised during consultation and to better reflect the findings of the Sustainability Appraisal.

3 Implications

Finance and Risk Implications

3.1 Work on the new Local Plan can be funded from existing budgets. It is important that this budget is maintained in future years.

Legal Implications including Data Protection

3.2 The Council has a statutory duty to keep under review the matters which may be expected to affect the development of their area. The most efficient and effective way to do this is through the preparation of a Local Plan.

Human Resources Implications

3.3 It is essential that the Planning Policy Team has sufficient staffing resources to deliver the Local Plan in a timely manner. The work programmes and timetables reflect this.

4 Recommendations

- 4.1 That the Local Plan Steering Group:
 - a) notes the feedback on the Vision from consultation and the independent Sustainability Appraisal and that this feedback will be taken into account when the Vision is refined as part of the next stages of the development of the Local Plan.

5 **Document Information**

Appendix No	Title	
Background Papers (These are unpublished works which have been relied on to a material extent when preparing the report. They must be listed in the section below. If the report is going to Cabinet (NEDDC) or Executive (BDC) you must provide copies of the background papers)		
Report Author		Contact Number
Helen Fairfax		2299

Report Reference -

Bolsover District Council

Local Plan Steering Group

Date of Meeting 25th January 2016

Report on the Proposed Objectives for the Local Plan for Bolsover District

Report of the Joint Assistant Director of Planning and Environmental Health (Written by Planning Policy Manager)

Purpose of the Report

- To provide a summary of the responses made in the recent consultation on the proposed Objectives for the Local Plan for Bolsover District.
- To provide a summary of the findings of the independent Sustainability Appraisal of the Objectives.
- To advise members of the next steps in the development of the Objectives.

1 **Report Details**

Background

- 1.2 One of the topics consulted on in the recent public consultation was the 'Objectives' for the Local Plan. These are a suite of 16 overarching guiding Objectives that will help to achieve the Vision by providing the reasoned justification for the policies and proposals in the Local Plan.
- 1.2 This report contains a summary of the general/overarching comments made to the objectives, and summaries of the comments made to each of the 16 individual objectives. It also contains a summary of how the 16 Local Plan Objectives perform against the Objectives set out in the independent Sustainability Appraisal

Overarching Consultation Responses

1.3

Few verbal comments were made on the Objectives at the eight 'drop-in' sessions in the district.

1.4 A total of 161 written comments were received on the Objectives. No significant objections were made. That is no-one suggested that an objective needed to be deleted to comply with national guidance, or fit in with their plans or policy objectives. However, a number of respondents put forward comments suggesting minor textual changes which could contribute to making the Objectives more robust. In addition, two respondents² asked for additional Objectives to be included in future iterations of the Local Plan for Bolsover District.

² Derbyshire County Council and the Environment Agency. See Section on comments from Specific Consultation Bodies below.

- 1.5 It should be noted that not everyone supporting or objecting to the Objectives gave a reason for doing so. A number of respondents made similar overarching points in relation to both the Vision and the Objectives.
- 1.6 In terms of comments made in respect of the Objectives as a whole, most responses were supportive. Key comments made in support were: that the Objectives appeared to be robust; support for delivering sustainable development and growth; that the Objectives were compliant with government guidance.
- 1.7 Key objections and suggestions to expand the Objectives were: that the Objectives needed to contain a specific reference to the Green Belt and the need to protect it from inappropriate development; that there was a need to include green measures, e.g. solar power for houses; references to how natural greenspace and trees could contribute to a number of the objectives, including urban air quality should be included; that the Objectives should include safeguarding natural assets; that there needed to be a reference to meeting the needs of Gypsies and Travellers as well as the settled population; that the focus of growth should be on enhancing natural growth, commensurate with the size of existing settlements.

Responses to individual Objectives.

1.8 The individual responses generated a mixture of support, objections, comment, and suggestions to change the wording and/or expanding the Objective.

Objective A

Objective A: Sustainable Growth

To support sustainable growth and the prudent use of resources through:

sustainable patterns of development; a careful consideration of the impacts of proposed development; provision of appropriate infrastructure to support development.

1.9 Objective A attracted responses in support and objection, comments, and requests for additional wording. Key points made were: that not all new development needed new infrastructure, and that new development could support existing infrastructure and add to the vitality of places. Suggestions were made to expand the Objective by: including a reference to the provision of education, adult care, and waste infrastructure in the reasons for the objective; including a reference to seeking positive opportunities to include new trees and greenspaces; to recognise the multiple benefits of blue and green infrastructure in new developments.

Objective B

Objective B: Climate Change

To mitigate against and adapt to climate change through:

the increased use of renewable energy resources; energy reduction to minimise pollution including greenhouse gas emissions;

minimising carbon emissions in new development; promoting sustainable design; avoiding unnecessary pressure on flood risk areas; protecting and supporting the ability of wildlife to respond to change.

1.10 Objective B attracted responses in support and objection, comments, and requests for additional wording. Key points made were: that the issues raised could often be mitigated allowing sites to be developed; that the measures sought to overcome the effect of climate change should be in line with national standards, and should not lead to additional costs for developers. Suggestions were made to expand the Objective by making references to: promote sustainable design and drainage; avoiding unnecessary pressure & inappropriate development in flood risk areas to avoid flooding; recognising the role of trees in mitigating the effects of climate change, including alleviating the risk of certain types of flooding; tackling commuting and congestion on the M1 by promoting walkable settlements.

Objective C

Objective C: Countryside, Landscape Character & Wildlife

To protect and enhance the quality and character of the countryside, its landscapes and villages.

Ensuring that development which takes place to meet identified rural development needs contributes positively to countryside character.

Protecting and enhancing the character and quality of local landscapes.

Protecting and enhancing wildlife and habitats.

1.11 Objective C attracted responses in support; objection, comments, and requests for additional wording. Key points made were: that maintaining the countryside should not mean that development should not take place adjoining existing settlements; special landscapes that are protected should be made clear in the plan, and clearly justified; landscapes should provide adaptations to the climate change and the ecosystems they can provide; there was potential in many development sites to secure long term improvements to landscapes; that there should be a green buffer on the edges of settlements leading into the countryside. Suggestions were made to expand the Objective to: make it more robust, and referring specifically to rivers and streams; include protecting the limestone ridge; include protecting ancient woodlands/veteran trees; by making a reference to historic landscape character.

Objective D

Objective D: Historic Environment

To safeguard, enhance, and where necessary regenerate the District's distinctive historic environment, including the wider settings associated with the District's outstanding heritage assets.

1.12 Objective D attracted only responses of support and/or comment. The main comment related principally to Conservation Areas. It noted that the effective application of the Objective was dependent upon the availability of clear and agreed evidence of the importance of any specific 'heritage asset'. A key tool in the protection of heritage assets is the designation of Conservation Areas. There is incomplete coverage of Conservation Area Appraisal and Management Plans across the district; a number of areas do not have a Management Plan; a number of the Conservation Areas are out of date. Without a review of Conservation Areas, and Appraisals and Management Plans it is unlikely that this Objective can be met, or that that the Local Plan will fully reflect government guidance on this issue.

Objective E

Objective E: Regeneration

To support the regeneration needs of urban and rural settlements.

To support suitable deliverable opportunities for the comprehensive redevelopment of brownfield sites.

1.13 Objective E attracted responses in support, objection, comments, and requests for additional wording. Key points made were: that the objective was in line with both existing and emerging national policy; that overreliance on brownfield sites will result in further under delivery and a failure of the strategy as it would not be viable or deliverable; that there are not sufficient brownfield sites to accommodate all of the development within the district: and, therefore a mixture of greenfield and brownfield sites will be needed for the Council to secure its Growth Agenda. Suggestions were made to expand the wording of the Objective to: recognise that some brownfield sites contain habitats of high ecological value; to reflect the need to contribute to Water Framework Directives; to reflect the important economic benefits which trees and woods can provide.

Objective F

Objective F: Tourism

To increase the attraction of Bolsover District as a tourist attraction through the protection of identified international and national assets, and supporting the growth of suitable tourist facilities.

1.14 Objective F attracted only responses of support and/or comment. Key points made were: a recognition of the value of tourism in expanding the economic base of the district is welcome; that the development of suitable tourist facilities close to national cycle routes and areas of local interest is in accordance with national policy; that any new tourist development should avoid encroaching in Rough Close Works in South Normanton; the important role that tourism could play in maintaining the vitality of rural areas including farm diversification. A suggestion was made to expand the wording of the Objective to reflect the important economic benefits trees and woods can provide.

Objective G

Objective G: Infrastructure

To provide the necessary infrastructure to support new development.

1.15 Objective G attracted responses in support, comments, and requests for additional wording. Key points made were: that the Objective was welcome as a means of ensuring that there is adequate physical infrastructure in place to support proposed developments; work will need to be undertaken with the county council to understand a range of infrastructure needs; the objective would be better if it was more explicit about the full range of infrastructure provision needed in the District. Suggestions were made to expand the wording of the Objective to refer to: supporting new infrastructure in instances where it is required; improvement to infrastructure will not include new roads to serve remote development since this encourages car dependency and is an unsustainable development pattern.

Objective H

Objective H: Sustainable Transport

To reduce the need for people to travel by car through:

Directing growth towards the most sustainable settlements;

Providing more employment in the District;

Working with others to improve public transport (bus and rail) services in

the

District

1.16 Objective H attracted responses in support, objection, comments, and requests for additional wording. Most of the comments focussed on the impact that this Objective would have on the distribution of development in the district. Key comments were: that although the principle of improving public transport services was supported, this was not an aspiration that could always be delivered as the network is not extensive or frequent in many locations; this means that growth should be focussed on settlements which are accessible to the main employment and service centres within and outside the district; that there is no mention of cycling in the Objective, and there should be a push for cycle routes throughout the district. A suggestion was made to expand the wording of the Objective to refer to locating new homes between existing service and employment centres and the M1.

Objective I

Objective I: Green Spaces and Green Infrastructure

To recognise the value of open space within communities and to protect, and where possible expand an integrated network of green infrastructure as set out in the Council's Green Infrastructure Study.

1.17 Objective I attracted responses in support, comments, and requests for additional wording. Key points made were: That the recognition of the value of open space within communities and intention to expand the green infrastructure network is supported; that this can be supported and delivered through major development proposals; that there is increasing evidence that access to woodland and greenspace is important in enabling people to get healthy exercise and also in improving their mental health and well being. Suggestions were made to expand the wording of the Objective by recognising the multiple benefits of greenspace, and that open space exists beyond communities.

Objective J

Objective J: Rural Areas

To support rural areas by protecting the character of rural settlements, and ensuring that development outside the main settlements reflects the existing size of villages whilst sustaining local services; supporting the diversification of rural businesses; and making provision for affordable housing.

1.18 Objective J attracted responses in support, comments, and requests for additional wording. Key points made were that: the highlighting of the distinctive rural character to much of Bolsover District was welcomed, as is the objective to conserve the distinctive character of rural areas; there is a balance to be achieved between promoting development to reflect the existing size of settlements and sustaining local services. Suggestions were made to expand the wording of the Objective by including a reference that local village infilling will seek to make the most efficient use of land commensurate with local character; and that existing numerical constraints on housing numbers in infill developments will no longer be applied.

Objective K: Health and Well Being

To improve health outcomes, and increase life expectancy for residents by addressing the economic and environmental factors underpinning health and well being.

Through working with healthcare partners to deliver new and improved health and social care facilities.

By improving access to the countryside and leisure and cultural activities.

1.19 Objective K attracted only responses of support and comments. Key points were that: the Objective along with the preparation of a Built Sports Facility Strategy and Playing Pitch Strategy would support the objectives and policy development; that the recognition of the importance of access to cultural activities which support well being is supported. A suggestion was made to expand the wording of the Objective

by adding 'to provide opportunities for people to enjoy the natural environment and value the biodiversity it supports'.

Objective L: Economic Prosperity

To promote economic prosperity by encouraging the growth of high value manufacturing businesses, business services, tourism, appropriate rural diversification initiatives and the cultural and creative industries. Recognising that environmental quality can help to attract inward investment.

1.20 Objective L attracted only responses of support and comments. Key points were that the definition should be expanded to include retail, and the hospitality industry, and that existing businesses should be supported by facilitating any necessary growth and expansion.

Objective M: Employment Opportunities

To create employment opportunities within the District through supporting the development of new enterprises and the growth of existing businesses. To help to deliver a diverse range of sites that are attractive to new investors in the District and also to enable the growth of existing businesses.

1.21 Objective M attracted only responses of support and comments. Key points made were that: the Council should seek to not just address the need but strive for quality and choice across the district in order to create sustainable employment opportunities which reduced out commuting for a wider range and higher quality employment; that the Objective should be more ambitious to build a strong and competitive economy and achieve a better balance of housing and employment provision in the district.

Objective N: Meeting Housing Needs

To provide housing that addresses the needs of all sectors of the community. To help to build / expand communities rather than just providing new housing.

1.22 Objective N attracted responses in support, objection, comments; and requests for additional wording. Key points made were; that new housing brings many benefits to a local population and that a NIMBY approach towards expanding villages currently in decline is only likely to exacerbate local problems of closing shops, schools and contracting public transport services; that to boost the supply of sites the Council needs to plan for viable and sustainable sites; the approach to future growth should consider local constraints such as hazardous consultation zones; that housing choice should be promoted by increasing the number of park homes in the district and promoting extended family living choice by permitting higher densities on existing dwelling plots (and that this should be included in the Objective). Suggestions were made to expand the wording of the Objective to include: providing housing to facilitate economic growth; and a commitment to provide housing that meets the fully objectively assessed needs of all sections of the community.

Objective O: Place Making

To ensure that place making is at the heart of the delivery of high quality well designed neighbourhoods and developments, and reflects the aspirations of local people.

To ensure that development takes place in a way that protects local amenity and does not undermine environmental quality.

1.23 Objective N attracted responses in support, comments, and requests for additional wording. Key points made were that the Objective should refer to local distinctiveness; that a lack of up to date Conservation Area Appraisals and Management plans represents a genuine (and avoidable) risk to the quality and speed of decision making within the planning system, and that consideration should be given to the allocation of resources to update that important part of the Local Plan evidence base. A suggestion was made to expand the wording of the Objective refer to: having regard to neighbouring land uses when considering location for new development and avoid incompatible uses.

Objective P: Town Centres

To sustain and improve retail, service, and leisure provision in town and local centres, and create distinctive places.

1.24 Objective P attracted responses of support and a request to expand the Objective by referring to the need to enhance the vitality and viability of town and local centres with improved retail, leisure and service provision.

Comments from Specific Consultation Bodies

- 1.25 As part of the consultation on the Identified Strategic Options, the Council consulted all of the 'specific consultation bodies'³. These bodies made the following comments on the Objectives:
- 1.26 **Derbyshire County Council's** response contains a mixture of support and objections as follows:

Object to the fact that none of the Objectives make any specific reference to the Green Belt or the need to protect it from inappropriate development. They consider that this should be included as a specific objective in either Objective A: Sustainable Development or Objective I: Green Spaces and Green Infrastructure.

Welcomes the approach in Objective A: Sustainable Growth, although they note that no mention of the provision of education, adult care or waste infrastructure is made in the reasons for the objective.

Strongly supports the acknowledgement in Objective G that development does not take place in isolation and the Bolsover needs to ensure the provision of the necessary physical and social infrastructure. However they consider that the

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³ As defined in The Town and Country Planning (Local Planning) (England) Regulations 2012

objective would be better if it was more explicit about the full range of infrastructure provision that may be necessitated by new development within the District.

Welcomes the Approach in Objective I: Green Spaces and Green Infrastructure

Comments on Objective N: Meeting Housing needs that Local Plan will seek to meet the Council's fully assessed needs of all sections of the community. This is referred to in the reasons for the Objective, but the County Council considers that this should be **in** the Objective.

Comments on Objective P: Town Centres that the Objective should refer to sustaining and enhancing the vitality and viability of town and local centres to reflect national guidance.

- 1.27 The Environment Agency welcomes the proposed Objectives but has asked for minor amendments to seven of the Objectives to make them more robust. In addition, they have requested a new stand alone objective relating to the Water Framework Directive. The suggested text is: 'To ensure that development takes place in such a way as to ensure the objectives of the Water Framework directive are achieved and that there is no deterioration in the ecological status of rivers and water bodies in the district'
- 1.28 **Highways England** welcomes Objective G: Infrastructure as a means of ensuring that there is adequate physical infrastructure (such as roads) in place to support proposed developments. They also welcome Objective H: Sustainable Transport as it aims to reduce the need for people to travel by car.
- 1.29 **Historic England** welcomes Objective D: Historic Environment, and comments that the Council might wish to refer to local distinctiveness in Objective O; Place Making.
- 1.30 **The Local Nature Partnership** supports the objectives listed, but request that reference is made to safeguarding the following assets to support the economy and social aims: mineral assets; soil, agricultural assets (agricultural land classification grade 1/2); water resource/provision; and air and air quality safeguarding)
- 1.31 **Rotherham Metropolitan Borough Council** supports the proposed Local Plan Objectives

Sustainability Appraisal

- 1.32 The Sustainability Appraisal found the proposed Local Plan Objectives to be broadly supportive of the Sustainability Appraisal Objectives, with some positives identified in each Objective (although the **number** of positives in respect of each Objective did vary).
- 1.33 This does not mean that tensions do not exist between the two sets of objectives. However, where tensions have been identified, this primarily relates to the aspiration to meet local needs and deliver economic prosperity, whilst at the same time seeking to protect and enhance the District's environmental assets and minimise resource use, waste and greenhouse gas emissions.

1.34 The Sustainability Appraisal concludes that where potential incompatibilities have been identified, tensions between the objectives can be resolved if development takes place in accordance with all of the Local Plan Objectives. As such, an incompatibility is not necessarily an insurmountable issue but one that may need to be considered in the development of policies that comprise the Local Plan.

2 Conclusions and Reasons for Recommendation

2.1 The development of the Objectives is an iterative process, and it is proposed that they will be refined as the Plan is developed. Whilst most of the responses were supportive of the Objectives, there is scope to amend the wording of the Objectives moving forward to take account of some of the issues raised during consultation and to better reflect the findings of the Sustainability Appraisal.

3 <u>Implications</u>

Finance and Risk Implications

3.1 Work on the new Local Plan can be funded from existing budgets. It is important that this budget is maintained in future years.

Legal Implications including Data Protection

3.2 The Council has a statutory duty to keep under review the matters which may be expected to affect the development of their area. The most efficient and effective way to do this is through the preparation of a Local Plan.

Human Resources Implications

3.3 It is essential that the Planning Policy Team has sufficient staffing resources to deliver the Local Plan in a timely manner. The work programmes and timetables reflect this.

4 Recommendations

- 4.1 That the Local Plan Steering Group:
 - a) Notes the feedback on the Objectives from consultation and the independent Sustainability Appraisal and that this feedback will be taken into account when the Objectives are refined as part of the next stages of the development of the Local Plan.

5 <u>Document Information</u>

Appendix No	Title
Background Pa	apers (These are unpublished works which have been relied
on to a material	extent when preparing the report. They must be listed in the
section below.	If the report is going to Cabinet (NEDDC) or Executive (BDC)
vou must provid	e copies of the background papers)

Report Author	Contact Number
Helen Fairfax	2299

Report Reference –

Bolsover District Council

Local Plan Steering Group

Date of Meeting 25th January 2016

Report on Housing Target Options

Report of the Joint Assistant Director of Planning and Environmental Health (Written by Planning Policy Manager)

Purpose of the Report

- To outline the considerations relating to the selection of a preferred housing target following the outcome of recent consultation on the Identified Strategic Options for the Local Plan.
- To provide Members with a recommendation on what preferred housing target should be taken forward for further consideration as part of the Local Plan Preferred Option.

1 Report Details

Background

1.1 Consultation on the Identified Strategic Options set out three alternative options for a housing target (see table below). The consultation document also allowed for the option of 'none of the above'. Effectively this allowed respondents to put forward alternative targets and why these might be appropriate.

Housing Target Options			
	Option A	Option B	Option C
Total number of dwellings for Local Plan period	2,775	3,600	5250
Number of dwellings per	185	240	350

year			
Comments	target based on the level of housing that has been built in the district in recent years	target based on the likely future needs of the district (the objectively assessed need or OAN) as assessed independently in the Strategic Housing Market Assessment	target based on a higher levels of housing growth than the district is assessed as needing

- 1.2 This report outlines the range of considerations that the Council will need to take into account when determining a preferred option for a housing target for the Local Plan. These are:
 - Local Plan Vision and Objectives
 - Findings of the sustainability appraisal and how this has influenced the preferred employment target.
 - Consultation responses.

Local Plan Vision and Objectives

- 1.3 In addition to seeking views on a new housing target for the district the recent consultation also put forward a Local Plan Vision. The Vision sets out what the Local Plan for Bolsover District aims to achieve, and how the district will be in 2033.
- 1.4 This section of the report considers how each of the three proposed housing targets relates to the overarching aims in the Vision and Objectives. None of the targets are wholly incompatible with the aims of the Vision and Objectives; however, some are a better fit with them than others.
- 1.5 The Vision is split into three sections to reflect the roles that the planning system is expected to perform and which form the three dimensions to sustainable development (Economic Role: Social Role & Environmental Role).
- 1.6 The economic role sets out the Council's aspirations for growth, and to extend the number and range of jobs in the district. It proposes that brownfield sites will have been remediated, and settlements enhanced. At first glance it would seem that this part of the Vision (which reflects the Council's Growth Agenda) would be best reflected in a higher housing target (Option C or another higher target). However, the Vision also reflects a desire to remediate brownfield sites. If there is a significant oversupply of housing land against demand it allows developers to cherry pick the

sites that are easier to develop, whilst avoiding more difficult but important brownfield sites. Therefore in respect of the economic dimension of the vision, a lower target is unlikely to achieve the growth the Vision aspires to, whilst a higher target runs the risk of failing to achieve the remediation of brownfield sites. Therefore in respect of this role Option B (240 dpa) would appear to be the best fit.

- 1.7 The social role sets out the Council's aspirations for the delivery of a range of housing and new infrastructure to accommodate it together with improved access to outdoor recreation space and a network of footpaths. Arguably the more housing developed the greater the opportunities for providing a greater range of housing, and if viability was not the issue that it is for the district, more housing could provide opportunities for funding for improved recreation creation/improved footpaths. A higher target could also potentially provide more funding for new infrastructure. However, this is rather simplistic because more housing would also create a need for new infrastructure. A lower target would be unlikely to meet the needs of everyone in the district. Therefore in respect of this role Option B would again appear to be the best fit.
- 1.8 The Environmental Role sets out the Council's aspiration to protect environmental and historic assets; improve and extend greenspaces and green infrastructure and wildlife assets; and high quality developments to help address climate change and reduce the potential for anti-social behaviour. The housing target is considered to be likely to have less impact on this role than the economic and social roles. A first glance it would seem that this role is best achieved by low levels of housing development. However, planned large scale developments can provide an opportunity to deliver new open space and green infrastructure and high quality developments.
- 1.9 A suite of Objectives sit below the Vision and set out how the Vision will be achieved. The direct relationship between the housing targets and specific Objectives is limited. However the housing target is likely to affect the following Objectives: Objective E Regeneration: Objective G: Infrastructure; and Objective N: Meeting Housing Needs. Housing target Option B (240 dpa) is the most likely to contribute to meeting Objective E: Regeneration for the reasons set out in paragraph 1.6 above. In relation to Objective G: Infrastructure housing target Option C (350 dpa) is most likely to generate the profits to help provide new infrastructure. However paradoxically it is the also the option that is most likely to generate the most need for new infrastructure Depending on the location of new development Option A (185 dpa) or Option B (240 dpa) are less likely to give rise to the need for new infrastructure. In relation to meeting Objective N: Meeting Housing Needs, Options B (240 dpa) or Option C (350 dpa) has the potential to provide a wide range of housing and comply with national guidance. However, Option B (240 dpa) probably has the greater potential to provide housing that assimilates with existing housing.
- 1.10 Overall it is considered that Option B (240dpa) provides a balance between low levels of development which would be contrary to the Council's Growth Agenda and aspirations for growth, and high levels of growth that would be more likely to have a significant/adverse impact on the environment.

Findings of the Sustainability Appraisal

- 1.11 The Sustainability Appraisal process is one of the legal tests for plan making. It is intended to be iterative with the findings of the Appraisal considered at key stages so that this informs the preparation of a Local Plan. The Council will be tested on its compliance with this legal test by an inspector at the Local Plan Examination.
- 1.12 Since the Steering Group last considered options for a housing target at their meeting on 4th August 2015, an initial Sustainability Appraisal Report has been prepared (October 2015).
- 1.13 The Sustainability Appraisal notes that the range and type of effects associated with all three housing target options are similar with significant positive effects identified in respect of housing, the economy and regeneration but negative effects expected in respect of biodiversity, air quality, climate change and resource use. Significant negative effects have been identified in respect of water for all options reflecting existing wastewater treatment capacity constraints in the District. In broad terms, the magnitude of both positive and negative effects is commensurate with the level of housing proposed.
- 1.14 The findings of the appraisal indicate that Option B (a housing target of 240 dwellings per year) is the best performing option when considered against the Sustainability Appraisal objectives. This option is expected to meet the District's objectively assessed need for housing whilst generally avoiding significant adverse socio-economic and environmental effects. Reflecting the scale of housing provision proposed (and so the associated land take), the potential for negative (including significant negative) effects is greatest under Option C (a housing target of 340 dwellings per year). Option A (a housing target of 185 dwellings per year) takes forward a lower housing target which could minimise the potential for negative effects across a number of the Sustainability Appraisal objectives used in this appraisal; however, Option 1A would not meet the District's objectively assessed need for housing.

Feedback from the drop-in sessions

1.16 Verbal feedback from the drop in sessions suggested that most people commenting on this issue favoured either Option B or Option A. People supporting Option A felt that this option was achievable; would not stress existing infrastructure/services; and would preserve as much agricultural/ greenfield land as possible. People supporting Option B felt that the District should provide for its own housing needs, but not the residual needs of other areas. Whilst they wanted to retain local services and facilities, and accepted that in some instances limited growth was a way of achieving this; they too wanted to preserve as much agricultural/ greenfield land as possible, and avoid stressing existing infrastructure. Reasons expressed for rejecting Option C were that it was too much growth for a rural area; would require unprecedented growth levels; and the loss of agricultural/greenfield land.

Feedback from written representations

1.17 A total of 107 written comments were received on a housing target. It should be noted that not everyone supporting or objecting to each of the Options made comments or gave reasons for their preference.

Option A (185 dwellings a year)

- 1.18 This option attracted 23 comments. The comments made fell into four main groups:
 - People objecting to Option A as being too high;
 - People objecting to Option A as being too low;
 - People supporting Option A; and
 - People objecting to Option A because they favoured one of the other options.
- 1.19 Key reasons given for Option A being considered too high were: that there is no need for an excessive number of new homes to be built; and that the idea of targets does not take into account the individual characteristics of an area.
- 1.20 Key reasons given for Option A being considered too low were: that it does not meet the minimum requirement of Objectively Assessed Needs; that it is not in compliance with government guidance⁴; that it would be unlikely to meet the needs of the community; that it is not realistic and therefore not a proper option for the Local Plan or the Sustainability Appraisal; that it would be difficult to justify despite being trend related; and that this target would have a high probability of being found unsound by a Planning Inspector unless robust evidence of constraints was provided.
- 1.21 Key reasons given for supporting Option A were: that it matches most closely the natural growth of the area: that it is sustainable; that it would help to retain the character of settlements in the district; that the current situation is that there is not going to be significant demand for new housing; that large areas of land had been purchased by builders over the last 10 years, but that this had been land banked rather than developed; and, that Options B & C are unrealistic based on past building rates.

Option B (240 dwellings a year)

- 1.22 This option attracted 41 comments. The comments made fell into three main groups:
 - People objecting to Option B as being too high;
 - People objecting to Option B as being too low;
 - People supporting Option B

1.23 Key reasons given for Option B being considered too high were: that it was unrealistic based on past building rates.

⁴ Paragraph 47 of the National Planning Policy Framework requires local planning authorities to 'boost significantly the supply of housing'.

- 1.24 Key reasons given for Option B being considered too low were: that it was insufficiently positive.
- 1.25 Key reasons given for supporting Option B were: that it was reasonable, but challenging in the light of past completion rates; that it would enable small scale residential development (on brownfield sites) to be progressed; that it was important to meet the housing need identified over the housing market area: that it was the most achievable option; that it is the most sustainable and realistic option, underpinned by available evidence; that to provide housing beyond this level and increase the need for commuting would go against environmental priorities; that the target would meet demand without putting too much pressure on green sites
- 1.26 It is worth noting that all of the local authorities commenting on the housing target⁵ favoured this Option. Of particular relevance, given that a number of respondents justified their preferences for a higher target on the need to accommodate unmet need from Sheffield⁶ is the response from the City Council, which states: 'Given the issues of viability, past delivery and an understanding of the recent work carried out by Edge Analytics on demographic modelling across the Sheffield City Region, Option B seems appropriate if challenging. We may need to discuss the potential for other districts within the SCR to address some of Sheffield's housing need. However, the housing market relationship between Sheffield and Bolsover is weaker than we have with some other districts. Sheffield's SHMA indicates a net loss of around 70 households per year to Bolsover, compared to 520 to Rotherham, 370 to Barnsley and 330 to North East Derbyshire. Therefore we suggest Option B, rather than a high housing target significantly above the level of identified need (Option C) specifically in order to meet any of Sheffield's housing needs'.

Option C (350 dwellings a year)

- 1.27 This option attracted 24 comments. The comments made fell into three main groups:
 - People objecting to Option C as being too high;
 - People objecting to Option C as being too low;
 - People supporting Option C.
- 1.28 Key reasons given for Option C being considered too high were: that it is unrealistic based on past build rates; that would be very unlikely to be deliverable or realistic as either a plan wide housing target or as the basis for the District's five year housing land requirement; that it represents unprecedented housing growth; that it is unrealistic to assume that this level of delivery could be achieved in Bolsover and sustained through the plan period; that it would result in over development
- 1.29 Key reasons given for Option C being considered too low were: that it was less than the target in the former East Midlands Regional Plan; that there would be a need to accommodate unmet needs from other authorities.

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⁵ Rotherham Metropolitan Borough Council; Bassetlaw District Council: Mansfield District Council; Chesterfield Borough Council; Sheffield City Council; and Derbyshire County Council.

⁶ See paragraph 1.30 below

1.30 Key reasons given for supporting Option C were: that Sheffield cannot meet its own needs and is likely to require that nearby authorities assist with this; that this is the most realistic option; the Option is in line with the requirement in national guidance 'to boost significantly the supply of housing'; that the Plan should seek to maximise housing supply in the district in order to facilitate sustainable future growth; that this will significantly increase the supply of housing and will therefore, add to, and increase, the supply for affordable homes; that it is sufficiently positive.

None of the Above

- 1.31 The 'none of the above/alternative rationale' category attracted 19 comments. Key comments and suggestions were:
 - That the target should be 251 dwellings a year to meet the top of the sensitivity test figure in the Strategic Housing Market Assessment;
 - That the target should be 300 dwellings a year. This would comply with national guidance to 'boost significantly the supply of housing';
 - That a higher target is needed to accommodate an element of overspill needs from outside the district such as Sheffield City (No neighbouring authority, including Sheffield City has asked Bolsover to meet any of its unmet needs);
 - That the target should reflect the former East Midlands Regional Plan (the Plan was revoked nearly three years ago. The statistics underpinning it are now more than a decade out of date);
 - That the housing target should reflect planned employment growth;
 - That the overall housing target should be increased to help the delivery of more affordable housing;
 - That the Strategic Housing Market Assessment is out of date (*it is barely two years old*);
 - Proper account has not been taken of the effect of suppression on household formation (*the SHMA specifically considers this*);
 - The target needs to take account of possible in migration from the EU and Turkey (the SHMA does this).

Comments from Specific Consultation Bodies

- 1.32 As part of the consultation on the Identified Strategic Bodies, the Council consulted all of the 'specific consultation bodies'⁷. These bodies made the following comments on the options for a housing target:
- 1.33 **Bassetlaw District Council** comments that following from previous conversations Bassetlaw would continue to support Option B (240 dpa): A housing target that meets the identified objectively assessed need, or Option C (350): A housing target that exceeds objectively assessed need.

⁷ As defined in The Town and Country Planning (Local Planning) (England) Regulations 2012

- 1.34 **Chesterfield Borough Council** welcomes clarity that Bolsover continue to view the North Derbyshire and North Nottinghamshire HMA as the most appropriate housing market area, and supports Option B (240 dpa).
- 1.35 **Derbyshire County Council** comments that meeting Objectively Assessed Housing needs should be a minimum key requirement of the Plan. They note viability is a key concern for the district, and that in this context a target of 350 dpa (Option C) would be very unlikely to be deliverable or realistic as either a plan wide housing target or the basis for the District's five year housing land requirement. The County Council support a target of 240 dpa (Option B), but suggest a plan-wide target of 250 dpa might be worthy of consideration by the Council if this was thought to be deliverable given viability considerations.

The County Council response also expresses concern that there is no assessment of how the employment land requirements relate to the housing target options, and considers that Bolsover Council may need to undertake further work to explore the relationship between housing and employment land needs to understand the implications of the preferred targets on each other.

- 1.36 **Highways England** does not express a preference for a housing target but comments that the impact of housing development on the highway network increases the more houses that are built, but notes that Option C (350 dpa) would require a significant amount of new houses with the consequent potential impact on the highway network this would entail.
- 1.37 Mansfield District Council comments that Option A (185dpa) would be difficult to justify despite being trend related; that Option B (240dpa) appears reasonable but challenging in light of past completion rates. In terms of Option C (350 dpa) BDC rightly recognises that this would require unprecedented levels of housing growth, difficult to achieve in view of the BDC housing market conditions and the limited viability within the housing market. They suggest that this approach could not be justified as being deliverable given market conditions
- 1.38 North East Derbyshire District Council comments that Option A (185 dpa) would not accord with the Local Enterprise Partnership's ambitions for growth or the Council's own Growth Strategy. If this was to be identified as the preferred option it would require BDC to demonstrate clearly that there was insufficient capacity within Bolsover District to accommodate Bolsover's objectively assessed housing need; Option C (350 dpa) would appear to raise issues of deliverability in relation to current and recent performance; Option B would meet Bolsover's objectively assessed need, and its share of housing need across the Housing Market Area. It is therefore the one that NEDDC is most able to support.
- 1.39 Rotherham Metropolitan Borough Council comments that whilst recognising the challenging implications for housing delivery, on the evidence provided Option B (240 dpa) provides an appropriate housing target which meets objectively assessed needs

- 1.40 **Sheffield City Council's**⁸ comments are set out in full at paragraph 1.26 above. They suggest Option B (240 dpa) rather than Option C (350 dpa) specifically in order to meet any of Sheffield's housing needs.
- 1.41 The Coal Authority, Environment Agency, Natural England, Historic England, Nottinghamshire County Council, and Severn Trent also responded to the consultation but did not make specific representations on the proposed housing target.

2 Conclusions and Reasons for Recommendation

- 2.1 Developing an appropriate housing target is not a straightforward matter. Council's are expected to co-operate to ensure that the level of objectively assessed need is met within the Housing Market Area. Where this is not possible local authorities are expected to work together to accommodate any unmet need. There is also an expectation that local authorities should accept the needs of other authorities where this is appropriate and they are able to do so. At the present time no neighbouring authority has suggested that they will be making such a request to Bolsover Council. In addition, Sheffield City Council has suggested Option B as the most appropriate target, rather than a high target specifically in order to meet any of Sheffield's unmet housing needs.
- 2.2 Essentially, a realistic housing target is a balance between under providing, and possibly stifling much needed development in the district; and over providing, where the market is unable to deliver the target and the Council is unable to demonstrate a five year supply of deliverable housing.
- 2.3 Overall, both the respondents to the Consultation and the initial independent Sustainability Appraisal favour Option B a housing target of 240 dpa (3,600 over the Local Plan period).
- 2.4 However, to ensure compliance with national guidance it will be necessary to undertake additional evidence base work to better understand the relationship between the preferred housing and employment targets.

3 Implications

Finance and Risk Implications

3.1 Work on the new Local Plan can be funded from existing budgets. It is important that this budget is maintained in future years.

Legal Implications including Data Protection

3.2 The Council has a statutory duty to keep under review the matters which may be expected to affect the development of their area. The most efficient and effective way to do this is through the preparation of a Local Plan.

⁸ Whilst SCC is not a specific consultation body, it is part of the wider SCR, and therefore useful to consider their views in this section of the report

Human Resources Implications

3.3 It is essential that the Planning Policy Team has sufficient staffing resources to deliver the Local Plan in a timely manner. The work programmes and timetables reflect this.

4 Recommendations

- 4.1 That the Local Plan Steering Group:
 - a) considers the contents of this report;
 - b) supports the proposal to take forward Option B (240 dwellings per annum) as the Housing Target for further consideration as part of the Local Plan Preferred Option and that this forms part of the Steering Group's recommendation to Planning Committee;
 - c) notes that further work is required to understand the relationship between the preferred housing and employment targets as part of the development of the next stage of the Local Plan.

5 <u>Document Information</u>

Appendix No	Title	
Background Papers (These are unpublished works which have been relied on to a material extent when preparing the report. They must be listed in the section below. If the report is going to Cabinet (NEDDC) or Executive (BDC) you must provide copies of the background papers)		
Report Author		Contact Number
Helen Fairfax		2299

Report Reference -

Bolsover District Council

Local Plan Steering Group

Date of meeting - 25th January, 2016

Report on Employment Target Options

Report of the Joint Assistant Director of Planning and Environmental Health (Written by Planning Policy Manager)

Purpose of the Report

- To outline the considerations relating to the selection of a preferred employment land target following the outcome of recent consultation on the Identified Strategic Options for the Local Plan;
- To provide Members with a recommendation on what preferred employment land target should be taken forward for further consideration as part of the Local Plan Preferred Option.

1 Report Details

Background

1.1 Consultation on the Identified Strategic Options consultation set out three alternative options for an employment target.

	Employment Target Options			
	Option A	Option B	Option C	
Total that would be allocated during Local Plan period (2018 - 2033)	65 hectares of new employment land	80 hectares of new employment land	100 hectares of new employment land	

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- 1.2 This report outlines the range of considerations that the Council will need to take into account when determining a preferred option for an employment target for the Local Plan. These are:
 - Local Plan Vision and Objectives
 - Findings of the sustainability appraisal and how this has influenced the preferred employment target.
 - Consultation responses.

Local Plan Vision and Objectives

1.3 The Local Plan Vision approved by members and published in October 2015 for public consultation includes an economic role, that states -

"By 2033, Bolsover District will be an attractive location for new and growing businesses. The economy of the District will have benefited from wider initiatives in the Sheffield City Region and D2N2 as well as more local initiatives to improve the quantity, range and quality of jobs in the district. Employment opportunities will have expanded into growing sectors such as advanced manufacturing, logistics and knowledge based sectors. The increased employment opportunities in the District mean that people will have access to a greater number and range of jobs without having to commute outside the District."

It is considered that a high target would best deliver this vision particularly in terms of improving the quantity, range and quality of jobs, within quite land intensive types of uses such as manufacturing and logistics.

1.4 The Local Plan Objectives approved by members and published in October 2015 for public consultation included two objectives that are of most relevance to choosing an employment target.

Objective L: Economic Prosperity

To promote economic prosperity by encouraging the growth of high value manufacturing businesses, business services, tourism, appropriate rural

diversification initiatives and the cultural and creative industries. Recognising that environmental quality can help to attract inward investment.

Objective M: Employment Opportunities

To create employment opportunities within the District through supporting the development of new enterprises and the growth of existing businesses. To help to deliver a diverse range of sites that are attractive to new investors in the District and also to enable the growth of existing businesses.

It is considered that a high target would best help to deliver economic prosperity, create employment opportunities, and provide a diverse range of sites.

Findings of Sustainability Appraisal

- 1.5 The Sustainability Appraisal process is one of the legal tests for plan making. It is intended to be iterative with the findings of the Appraisal considered at key stages so that this informs the preparation of a Local Plan. The Council will be tested on its compliance with this legal test by an Inspector at the Local Plan Examination.
- Overall, the Sustainability Appraisal report advises that there are no 'significant' negative impacts with any of the options, but also that there are no 'significant' positive impacts either. As reported to the meeting of the Steering Group in December, the Sustainability Appraisal Report advises that **Option 3** (an employment land target of approximately 100 ha per annum) would deliver the greatest economic benefits of the three options appraised, although this benefit would need to be balanced against any potential adverse effects resulting from the future choice of site allocations to deliver the target. So potentially, there could be greater negative environmental impacts depending on which sites were selected to meet the target. Sites will be subject to a further Sustainability Appraisal, and if sites were selected that potentially would have negative environmental impacts, the Council would need to show how these negative impacts could be mitigated.

Summary of consultation responses

1.7 In response to the Council's question "Which employment target option do you think is the most appropriate for Bolsover District?" 71 representations were received from a total of 51 respondents ranging from local residents and organisations, national organisations and local authorities, and other interested individuals. The summary below details the main points of the representations received. Not all respondents provided a comment. Representations have been grouped into three categories: local residents; community groups, national organisations and agents; and neighbouring authorities.

Option A – 65 hectares

1.8 The table below shows the number of representations made in respect of the lowest target, Option A-65 hectares. There were 17 representations made with almost equal numbers supporting and objecting.

Option A	Support	Object
Local Residents	6	4
Community Groups, National Organisations & Agents	1	3
Neighbouring Authorities	2	1
Total	9	8

Comments from Local Residents

- 1.9 Local Residents supporting this target considered that:
 - "Over-development may be detrimental to the historic and heritage values of the district."
 - "There was no guarantee that having more industrial space would benefit local people."
 - "The focus should be on developing areas to meet demand rather than in anticipation of potential demand."

One local resident, objecting to the target considered that the district did not need lots of warehouse space, and another local resident thought that the target was inadequate.

Comment from Community Groups, National Organisations and Agents

1.10 A & D Architecture considered that the target was insufficiently positive.

Comments from Neighbouring Authorities

1.11 Sheffield City Council consider that Option A should be chosen because it is the option that is closest to Bolsover's Flute forecasts scenario of 45 hectares within Bolsover's Economic Development Needs Assessment (EDNA). Sheffield has used its own Flute forecasts to inform its Citywide Options consultation document, and Bolsover doing the same would show a consistent approach.

Mansfield District Council considers that Option A would be sufficient (whilst also stating that they do not object to Option B).

Derbyshire County Council objected to this target on the basis that it would be unrealistic as it would be a target below the existing committed land supply and would not be particularly ambitious.

Option B – 80 hectares

1.12 The table below shows the number of representations made in respect of target Option B – 80 hectares. There were 30 representations made with 27 supporting and 3 objecting.

Option B	Support	Object
Local Residents	15	0

Community Groups, National Organisations & Agents	9	2
Neighbouring Authorities	3	1
Total	27	3

Comments from Local Residents

- 1.13 Local residents supporting the target considered that:
 - "The extra 15 hectares (over option A) for warehouses and distribution would seem to be the safer middle option to support extra growth without impacting too much on the district's character."
 - "If improvements are needed what funding is available to deal with the road networks ability to deal with this increase?"
 - "Support but only if Brownfield land is used."
 - "This option also makes use of all that is already available and therefore provides most opportunity with least disruption."
 - "Option B provides the best fit between amiable workforce, land availability and future demand"

1.14 <u>Comments from Community Groups, National Organisations and Agents</u>

- Clowne Community Association consider that "The Clowne/ Barlborough employment/ population area level of planned growth at Barlborough Links of Tha is deemed appropriate for the plan period."
- The National trust considers that "Option B offers a sensible mid-range allowing developers some flexibility in site selection and ensuring that the Council does not need to de-allocate sites."
- A&D Architecture objected to this option on the basis that it was insufficiently positive.

1.15 Comments from Neighbouring Authorities

- Chesterfield Borough Council consider that the 80 ha seems the most appropriate but also state that"the document does not explain the reasons why the council consider past take up rates to be so significant, and what the evidence is to suggest that these rates may continue over the next 15 or so years, and that it would be interesting to understand how a potential over provision of employment land in Bolsover would affect neighbouring areas."
- Derbyshire County Council consider that "Option B is based on the amount of committed land supply, so that would appear to be a minimum

- requirement to base future needs upon but again would not be ambitious although more realistic in terms of deliverability."
- Mansfield District Council considers that "the fact that land with existing planning permission to provide for option B exists, also seems a reasonable approach."
- Rotherham Metropolitan Borough Council consider that "Options B or C would provide the most appropriate employment land target, subject to evidence base demonstrating that proposed employment and housing requirements are appropriately aligned."

Option C - 100 hectares

1.16 The table below shows the number of representations made in respect of the higher target Option C – 100 hectares. There were 21 representations made with 14 supporting and 7 objecting.

Option C	Support	Object
Local Residents	7	4
Community Groups, National Organisations & Agents	6	2
Neighbouring Authorities	1	1
Total	14	7

Local Residents

- 1.17 A local resident supporting the target considered that:
 - "We desperately need the infrastructure and employment locally to support the local community;"

1.18 Community Groups, National Organisations & Agents

- Kember Loudon Williams consider that "Option C is the only option that is considered to provide sufficient employment provision that is required to meet the need resulting from the housing delivery over the Plan period."
- Coverland (local company) consider that a higher target growth rate will assist in seeking to remedy the discrepancy that jobs densities in the District are lower than in the region and country as a whole.
- The Planning and Design Group consider that Option C is "the most suitable approach to positively draw and maintain employment into the District and be reflective of the national drive to assist the role of business as a catalyst of growth and progress within local planning authority boundaries."
- Anthony Aspbury consider that "With optimistic forecasts for employment growth in the District, Option C is the most logical option to support as it will

provide a range of choice, enable one or more strategic options to be considered and potentially reduce the levels of out-commuting from the District."

1.19 Neighbouring Authorities

- Rotherham Metropolitan Borough Council suggests that "Options B or C would provide the most appropriate employment land target, subject to evidence base demonstrating that proposed employment and housing requirements are appropriately aligned."
- Derbyshire County Council support the evidence as presented in the EDNA, and agree that the existing four large sites should be investigated fully before any new large single allocation are brought forward to avoid a potential oversupply of employment land.

1.20 None of these Options

Three respondents supported none of the options.

- Heaton Planning representing Waystone, consider that "the Council's approach to economic development / the employment target options are not positively prepared, justified or consistent with national policy. All of the employment options put forward by the Council in the Identified Strategic options document comprise significantly lower levels of employment land than previously proposed. (185 and 250). There is very little explanation as to how and why these scenarios were selected and, indeed, why other scenarios were not. It is therefore very difficult to comment on the appropriateness of the employment target options. Given that one of the Local Plan's objectives is to create employment opportunities and deliver a diverse range of sites to attract new investors, we do not consider that any of the proposed employment targets are sufficiently ambitious or consistent with the approach to building a 'strong and competitive economy' advocated in the NPPF".
- Signet Planning consider that "there is a need to acknowledge that there are two distinct employment areas in the district the south (around South Normanton / Pinxton and the A38 / M1 that is more focussed towards the south, Nottingham and Derby and the rest of the district that is more focussed towards the Sheffield City Region and the North. Any employment strategy must deliver in both areas and as a consequence a high allocation may be required. The Council needs to take advantage of the economic benefits that may accrue from HS2. Whilst there is no station in Bolsover District, the district is well placed geographically to assist in its construction and future maintenance."

It should be noted that neither of these respondents have suggested an alternative target.

Neighbouring Authorities

1.21 Given that the Council considers that the delivery of employment land across the district's Functional Economic Market Area (FEMA) is one of its key strategic matters in the context of the Duty to Co-operate, it is important to consider responses from neighbouring authorities, including those within the FEMA about the employment target options. The following table summarises the responses from neighbouring Sheffield City Region authorities about the employment target.

Neighbouring Authorities within Bolsover's FEMA.				
Local Authority	65 ha	80 ha	100 ha	
Chesterfield		✓	?	
Mansfield	✓	✓		
Ashfield				
Amber Valley	No comments received about employment target			
North East Derbyshire				
Bassetlaw				

Other Authorities				
Local Authority	65 ha	80 ha	100 ha	
Sheffield	✓	X	X	
Rotherham		✓	✓	

X = Object
√ = Support ? = Questioned Merits

- 1.22 Four of the authorities that are considered to be included within the Council's Functional Economic Market Area: Ashfield District Council, Amber Valley Borough Council, Bassetlaw District Council and North East Derbyshire District Council's have not responded to Question 4. Neither of the two local authorities who responded (Chesterfield Borough Council or Mansfield District Council) supported the higher option (100 ha), but they did appear to be comfortable with the middle option (80 ha). Whilst Rotherham Metropolitan Borough Council is not considered to be within the district's FEMA, it is part of the Sheffield City Region, and it would support the higher target subject to evidence concerning the alignment of housing with employment. Sheffield City Council considers that Options B & C provide too high a target. It is suggested therefore that if the Council wishes to pursue a higher target it will be necessary to address concerns raised, such as
 - Better understanding the relationship between housing and employment targets.
 - Justification of sites that could support large retail logistics
 - The impact on neighbouring authorities.

Towards a preferred Employment Target

1.23 Whichever target the Council decides upon it must be deliverable. In order to best demonstrate that the target is positively prepared, justified and consistent with national policy, and align with the Council's growth agenda, it is proposed that the

Council should select as high a target as possible. However, the exact target the Council selects will depend upon resolving a number of uncertainties relating to the deliverability of a number of key sites (see below).

Coalite

1.24 A large part (26 ha) of the Council's current supply is made up by the planning permission at Coalite. However, further work is required in order that the Council can be confident about the site's deliverability over the plan period.

Clowne North

1.25 The proponents of Clowne North are proposing 78 hectares of employment land. Until a decision is made about: the principle of employment land in this location; the quantum of development; and whether the proposal stacks up as a strategic site proposal, the Council is not in a position to know whether land at Clowne North could form part of a higher target. For clarity, the whole 78 hectares would constitute an over provision of employment land when added to existing commitments that would not be in line with the Council's evidence (EDNA). Such a scale of development would need to be clearly justified in light of its contribution to the wider city region growth ambitions and over a longer timescale beyond the plan period.

Wincobank Farm, South Normanton

1.26 This 12 hectare site was allocated within the Adopted Local Plan (2000) as a reserve site for large firms. Originally, 26 hectares, with 14 hectares now developed, the site in terms of its size, shape and location is a possible candidate as a site for a large logistics operation. To date there has been no contact with landowners or agents to discuss how the site could be brought forward. This needs to take place.

Allocated sites in the Adopted Local Plan (2000).

- 1.27 There are about 30 hectares of smaller sites that have been allocated within the Adopted Local Plan (2000) and are undeveloped and seem to have low market interest. Most of these sites are undeveloped plots within established industrial estates. The EDNA provides the Council with an independent assessment of these and the Council will still need to decide whether these should continue to be allocated in the new local plan.
- 1.28 With a fair degree of uncertainty surrounding the deliverability of these sites, the Planning Policy team will have to undertake further work in terms of contacting landowners and site proponents about how and when they propose to bring their site forward, and then take a view on the information received regarding whether or not the Council can be convinced of the sites' deliverability over the plan period.

1.29 If, after further investigative work, none of these larger sites can be shown to be deliverable during the plan period, then it would be prudent to select a lower target, nearer to Option A – 65 hectares.

2 Conclusions and Reasons for Recommendation

- 2.1 The feedback from consultation showed that overall the middle target option received most support, 25, and least objections, 3. The higher target Option received the next highest number of supports 13, along with 7 objections. The lowest target option received 9 supports and 8 objections.
- 2.2 A high target would best achieve the local plan vision and two of the local plan objectives.
- 2.3 At this stage, without knowing which sites the Council will select, the Sustainability Appraisal does not raise any major concerns with any of the target options.
- 2.4 In terms of the tests of soundness, the Council's evidence, the Economic Development Needs Assessment (2015) has followed National Planning Practice Guidance and recommends a need for between 65 and 100 hectares of employment land. Therefore a target at the higher end of this range would be 'justified', and also be 'positively prepared' and 'consistent with national policy' that wants to encourage a strong and competitive economy; and would also be in accordance with the Council's growth agenda.
- 2.5 A higher target may cause concern with some of the District's neighbours. The issues / concerns raised need to be fully explored and addressed under the duty to co-operate. It is expected that further work will need to be commissioned in order to better understand the relationship between the housing and employment targets and the impact upon the Council's neighbours.
- 2.6 The Council already has 75 hectares with planning permission, and some of these are sites of 10 hectares or more that will take a few years to build out. So, early on in the plan period, the Council's current supply is already 75% of the way towards the higher target. However, further work will be required between now and the Autumn to ascertain which sites the Council can include within its deliverable supply. Uncertainties currently exist over the deliverability of Coalite, Clowne North, Wincobank Farm and many smaller allocations within the Adopted Local Plan (2000). Therefore only when greater certainty exists over the deliverability of these sites, can the Council have greater certainty about the precise level of the higher target. However, in order to guide the next stage of the plan preparation, it is recommended that the Local Plan Steering Group continue to support a target of between 80 and 100 hectares (Options B and C).

3 Implications

Finance and Risk Implications

3.1 Work on the new Local Plan can be funded from existing budgets. It is important that this budget is maintained in future years.

Legal Implications including Data Protection

3.2 The Council has a statutory duty to keep under review the matters which may be expected to affect the development of their area. The most efficient and effective way to do this is through the preparation of a Local Plan.

Human Resources Implications

3.3 It is essential that the Planning Policy Team has sufficient staffing resources to deliver the Local Plan in a timely manner. The work programmes and timetables reflect this.

4 Recommendations

- 4.1 That the Local Plan Steering Group:
 - a) considers the contents of this report;
 - b) supports the proposal to take forward a range between approximately 80 and approximately 100 hectares as the Employment Target for further consideration as part of the Local Plan Preferred Option and that this forms part of the Steering Group's recommendation to Planning Committee;
 - c) notes that further work is required to understand: the relationship between the preferred housing and employment targets; and the deliverability of existing allocations and suggested sites, as part of the development of the next stage of the Local Plan.

5 Document Information

Appendix No	Title			
Background Papers (These are unpublished works which have been relied on to a material extent when preparing the report. They must be listed in the section below. If the report is going to Cabinet (NEDDC) or Executive (BDC) you must provide copies of the background papers)				
Report Author		Contact Number		
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