



Development Plan Document (DPD) Second Publication Stage Representation Form

Second Publication Amended Allocations & Development Management Development Plan Document (DPD)

The District Council have produced a guidance note to assist in the completion of this form. Copies have been provided in correspondence and additional copies are available at: Castle House, Libraries in the District and <https://www.newark-sherwooddc.gov.uk/aadm-representation/>

Newark and Sherwood District Council is seeking your comments on the Second Publication Amended Allocations & Development Management DPD ('Second Publication AADMDPD'). Comments received at this stage should be about whether the Plan is legally compliant, sound and whether it has met the duty to cooperate. All representations must be received by the Council by 5pm on Monday 6th November 2023.

This form has two parts- Part A- Personal / Agent Details and Part B- Your Representation(s) and further notification requests. (Please fill in a separate sheet (Part B) for each aspect or part of the Local Plan you wish to make representation on). Documents to support your representations (optional) should be referenced.

Privacy Notice

Apart from your comments below, the personal information you have provided will only be used by Newark & Sherwood District Council in accordance with the UK General Data Protection Regulation and the Data Protection Act 2018 and will not be shared with any third party.

The basis under which the Council uses personal data for this purpose is to undertake a public task.

The information that you have provided will be kept in accordance with the Council's retention schedule, which can be found at: <https://www.newark-sherwooddc.gov.uk/dataprotection/>

Please note the Council cannot accept anonymous responses. All representations received will be made available for public inspection and therefore cannot be treated as confidential. They will also be:

- Published in the public domain;
- Published on the Council's website;
- Shared with other organisations for the purpose of developing/adopting the Publication AADMDPD and forwarded to the Secretary of State for consideration;
- Made available to the Planning Inspector appointed by the Secretary of State to examine the Publication AADMDPD; and
- Used by the Inspector to contact you regarding the Examination of the Plan.

When making representations available on the Council's website, the Council will remove all telephone numbers, email addresses and signatures.

By submitting your Response Form/representation, you agree to your personal details being processed in accordance with these Data Protection Terms.

If you previously made a representation to the first Publication Allocations & Development Management DPD (November 2022) Regulation 19 stage, we would like to know how you want this to be treated. All representations made at that stage will be forwarded on to the Inspector unless you wish to supersede it with a new representation to this Second Publication Allocations & Development Management. Please make this clear at the beginning of your Representation. If your previous representation is no longer required because of the proposed changes made to this Second Publication AADMPD, please let us know that you are happy for your previous representation to be withdrawn.

PART A- Personal / Agent Details

In circumstances where individuals/groups share a similar view, it would be helpful to the Inspector to make a single representation, stating how many people the submission is representing and how the representation was authorised.

1. Personal Details

2. Agents Details

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in column two.*

Title	<input type="text"/>	<input type="text" value="Mr"/>
First Name	<input type="text"/>	<input type="text" value="Phil"/>
Last Name	<input type="text"/>	<input type="text" value="Robinson"/>
Job Title (where relevant)	<input type="text"/>	<input type="text" value="Senior Planning Director"/>
Organisation (where relevant)	<input type="text" value="Gleeson"/>	<input type="text" value="Pegasus Group"/>
Address Line 1	<input type="text"/>	<input type="text" value="Queens House"/>
Line 2	<input type="text"/>	<input type="text" value="Queen Street"/>
Line 3	<input type="text"/>	<input type="text" value="Manchester"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	<input type="text" value="M2 5HT"/>
Telephone Number	<input type="text"/>	<input type="text" value="REDACTED"/>
Email Address	<input type="text"/>	<input type="text" value="REDACTED"/>

Name or Organisation:	<input type="text"/>
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PART B- Representation(s)

3. To which part of the DPD does this Representation relate?

Part of the Second Publication AADMDPD:	Mark if Relevant (X)	Specify number/part/document:
Second Amended AADMDPD Paragraph Number		Paragraph Number:
Second Amended AADMDPD Policy Number		Policy Number:
Second Amended AADMDPD Policies Map Amendments	x	Part of Policy Map: Billsthorpe
Integrated Impact Assessment ¹		Paragraph Number:
Habitat Regulations Assessment		Paragraph Number:
Statement of Consultation		Paragraph Number:
Supporting Evidence Base		Document Name: Page/Paragraph:

4. Do you consider the DPD to be LEGALLY COMPLIANT?

Yes

No x

5. Do you consider the DPD to comply with the Duty-to-Cooperate?

Yes

No

6. Do you consider the DPD to be SOUND?

Yes

No x

*The considerations in relation to the Legal Compliance, Duty to Cooperate and the DPD being 'Sound' are explained in the Newark & Sherwood Development Plan Document Representation Guidance Notes and in Paragraph 35 of National Planning Policy Framework (NPPF) (2023).

¹ The Integrated Impact Assessment (IIA) integrates Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA), Equalities Impact Assessment (EqIA) and Health Impact Assessment (HIA). Sustainability Appraisals (SA) are a requirement of the Planning and Compulsory Purchase Act 2004 and Strategic Environmental Assessments (SEA) are required by European Directive EC/2001/42, which was transposed into UK law by the Environmental Assessment Regulations for Plans and Programmes (July 2004). The EqIA is a way of demonstrating the District Council is fulfilling the requirements of the Public Sector Equality Duty contained in section 149 of the Equality Act 2010. HIA is a recognised process for considering the health impacts of plans and undertaking this type of assessment is widely seen as best practice.

7. The DPD is not sound because it is not:

- (1) Positively Prepared
- (2) Justified
- (3) Effective
- (4) Consistent with national policy

8. Please provide precise details of why you believe the DPD is, or is not, legally compliant, sound or in compliance with the duty to cooperate in the box below.

If you wish to provide supplementary information to support your details, please ensure they are clearly referenced.

Please see supporting statement

(Continue on a separate sheet/expand box if necessary)

9. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 6 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see supporting statement

(Continue on a separate sheet/expand box if necessary)

Please note your Representation should cover succinctly all the information, evidence and supporting Information necessary to support/justify the Representation and the suggested change, as there will not normally be a subsequent opportunity to make further Representations based on the original

Representations at the Publication stage. **After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for Examination.**

10. If your Representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral Examination.	Yes, I wish to participate at the oral Examination.
<input type="checkbox"/>	x <input checked="" type="checkbox"/>

11. If you wish to participate at the oral part of the Examination, please outline why you consider this to be necessary.

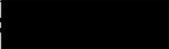
To discuss Proposal Map changes

(Continue on a separate sheet/expand box if necessary)

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the Examination.

12. Please tick the relevant boxes below to receive notifications (via email) on the following events:

- DPD submitted to the Secretary of State for Inspection x
- Examination in Public hearing sessions x
- Planning Inspector’s recommendations for the DPD have been published. x
- DPD has been formally adopted. x

Signature: 

Date: 6/11/23

Please return this form by 5pm on 6th November 2023 to one of the addresses below:

Email: planningpolicy@newark-sherwooddc.gov.uk

Post: Planning Policy & Infrastructure Business Unit
Newark & Sherwood District Council
Castle House
Great North Road
Newark
NG24 1BY

Information is available at:
<https://www.newark-sherwooddc.gov.uk/aadm-representation/>

Office Use Only
Date of Receipt:
Representation No:

P23 – 2214_LO01v3_ PL_MAN_KR_PR

6th November 2023

Planning Policy and Infrastructure
Newark and Sherwood District Council
Castle House
Great North Road
Newark
NG24 1BY

By email only: planningpolicy@newark-sherwooddc.gov.uk

Dear Sir or Madam,

Newark and Sherwood Second Publication Amended Allocations and Development Management Policies DPD Consultation (September 2023)
Land at Oldbridge Way, Bilsthorpe
Response on behalf of Gleeson

Thank you for this opportunity to submit comments in relation to the Newark and Sherwood Amended Allocations and Development Management Policies DPD (AADMPDPD). We submit comments on behalf of our client, Gleeson, who has land interests at Oldbridge Way, Bilsthorpe.

The Site

The site is a large, broadly linear plot of land which abuts the southern edge of Bilsthorpe. To the north is the existing settlement of Bilsthorpe and to the east and west is the new residential development which is being delivered by Gleeson. Land to the south of the site is designated as open countryside. A playing field is located adjacent to the north eastern corner of the site.

The site is currently being built out by Gleeson, who gained planning permission for the re-development of the entire site for 120 dwellings in July 2020 (application reference: 20/OO642/FULM). This followed multiple earlier planning applications for the residential redevelopment of the wider site parcel.

Figure 1 below is an approved planning layout plan to show how the comprehensive redevelopment will be delivered on site.

Queens House, Queen Street, Manchester, M2 5HT

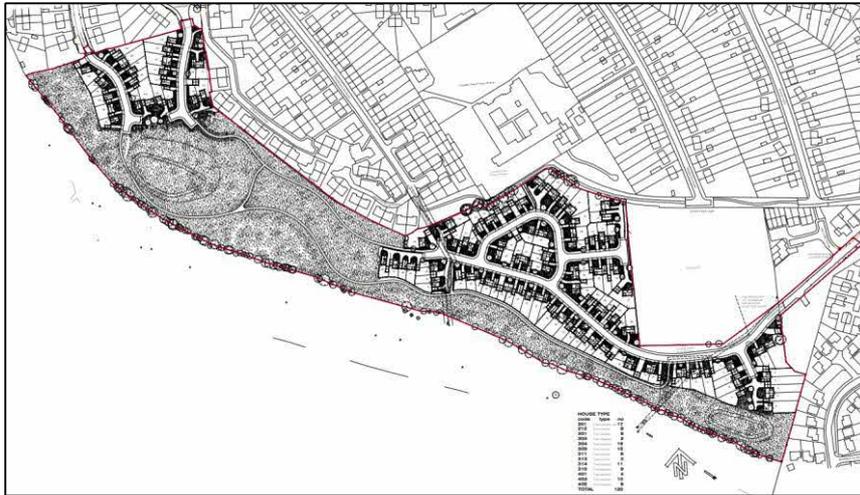
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Figure 1– Approved Layout Plan



This followed an earlier approved proposal to build further into this undeveloped land. As shown in Figure 2 below, application 16/01618/OUTM approved built form further into this undeveloped land and the Council approved this in April 2017. The Council considered this as an appropriate location for development and there were no site- specific constraints to prevent this land being developed.

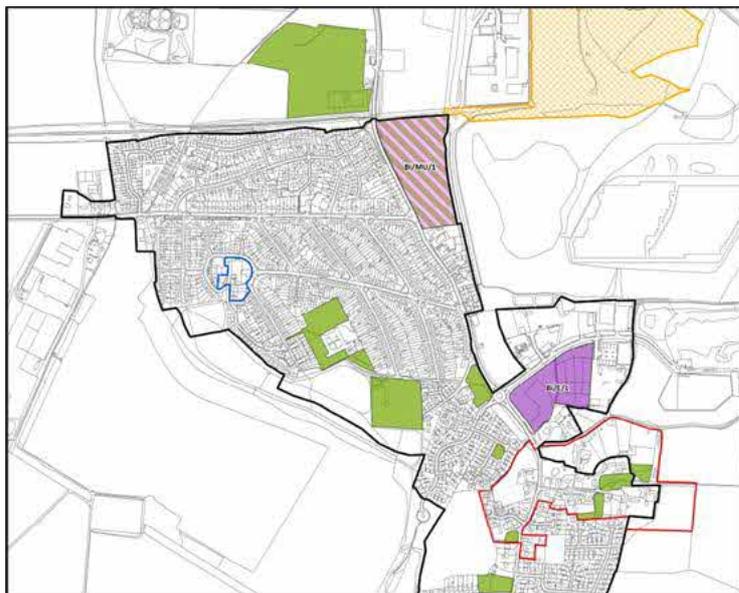
Figure 2 – Approved masterplan for application 16/01618/OUTM



Proposed Settlement Boundary for Bilsthorpe

The proposed settlement boundary, which is being discussed as part of this consultation, is shown in Figure 3 below. The settlement boundary proposes to tightly follow the edge of the built development that is coming forward. For some unknown reason it currently excludes the green space within the centre of development from the settlement boundary, despite this forming part of the comprehensive redevelopment of this site.

Figure 3 – Proposed Settlement Boundary within the AADMPDPD



The green space forms an integral part of this development and sits in between the two blocks of development coming forward. The boundary to the edge of the developed part of this site is poorly defined. It is not formed with any physical feature which could be readily recognisable, and which is likely to be permanent. Accordingly, we are concerned with the way in which the settlement boundary has been drawn which we wish to set out within these representations. The settlement boundary should be drawn as per Figure 4 below.

Figure 4 – Proposed Settlement Boundary



Settlement Boundaries Context

A settlement boundary is a line which is drawn on a policies map around a village or area of built development. The settlement boundary is used as a policy tool reflecting the area where a set of plan policies are to be applied. Settlement boundaries should be drawn to facilitate an appropriate level of proportional growth within the plan period.

The National Planning Policy Framework (NPPF) (2023) sets out the government's planning policies for England. The NPPF does not directly discuss defining a settlement boundary however it does provide a few paragraphs which are relevant to setting settlement boundaries.

Paragraph 11a of the NPPF advocates flexibility in the plan-making process to;

'Promote a sustainable pattern of development that seeks to meet the development needs of the area'.

There are no specific requirements within the NPPF or the Planning Practice Guidance (PPG) to review settlement boundaries as part of the Local Plan, and that is it for individual Local Planning Authorities to determine the most appropriate approach, based on local circumstances. However, it is clear in the NPPF that there should be a clear separation of the urban areas from the defined countryside.

There is no clear evidence within the Council's evidence base which sets out how the settlement boundaries have been drawn and what methodology has been used. From a review of other Councils' Local Plans and their evidence base, a settlement boundary paper is usually prepared,



which sets out what methodology will be used and how this has been applied to the settlements within the borough. Without this evidence and from reviewing the proposed settlement boundary for Bilsthorpe, it is unclear why the settlement boundary has been drawn this way and why this comprehensive development has not been included within the settlement boundary in its entirety, following permanent and recognisable features.

This area of Bilsthorpe is not characteristic of the countryside and this part of the site can no longer be considered as having a countryside setting. Over one hundred new dwellings are coming forward in this area which has significantly changed the character of this area. This land is now well related to the built form of Bilsthorpe and characteristic of the built environment surrounding it. Therefore, all of land should be included within the settlement boundary, as shown in Figure 4.

Open Space

As per the Council's Open Space Assessment and Strategy Document, prepared in January 2022, this site is not designated open space and is not included within the Council's totals for the open space available within the borough.

The report confirms that there is no need for additional open space to be identified within Bilsthorpe as there is a plentiful supply.

As such, if this area is to be included in the settlement boundary it should just be identified as land within the settlement boundary as opposed to open space as it is not counted within the Council's open space supply.

Conclusion

As part of the Newark and Sherwood Second Publication Amended Allocations and Development Management Policies DPD Consultation, the Bilsthorpe settlement boundary should be amended to include land which is currently being delivered as a comprehensive redevelopment of the site. This land is not designated open space, nor has it been included within the within the open space provision within the Council's recent open space assessment (2022). The area is not characteristic of the countryside and therefore should be included within the settlement boundary.

We trust our representations are clear but if you have any questions or wish to discuss this further, please do not hesitate to contact us by using the details provided below.

Yours Sincerely





Kate Roberts
Principal Planner

Enc. Phil Robinson