

# Report on Retford Town Centre Neighbourhood Plan 2022 -2038

An Examination undertaken for Bassetlaw District Council with the support of the Retford Town Centre Neighbourhood Planning Group (RTCNPG) on the November 2023 submission version of the Plan.

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## Main Findings - Executive Summary

From my examination of the Retford Town Centre Neighbourhood Plan (the Plan/RTCNP) and its supporting documentation including the representations made, I have concluded that subject to the policy modifications set out in this report, the Plan meets the Basic Conditions.

#### I have also concluded that:

- The Plan has been prepared and submitted for examination by a qualifying body – The Retford Town Centre Neighbourhood Planning Group (RTCNPG);
- The Plan has been prepared for an area properly designated Retford Town Centre as shown on Map 1 of the submitted Plan;
- The Plan specifies the period to which it is to take effect 2022-38;
   and
- The policies relate to the development and use of land for a designated neighbourhood area.

I recommend that the Plan, once modified, proceeds to the business and domestic referendums on the basis that it has met all the relevant legal requirements.

I have considered whether the area for the purposes of the referendums should extend beyond the designated area to which the Plan relates and have concluded that it should not.

## 1. Introduction and Background

## Retford Town Centre Neighbourhood Plan 2022- 2038

- 1.1 Retford is a market town within the District of Bassetlaw. The town had a population of 23,700 and 11,000 households at the time of the Census in 2011, being the second largest town in the District after Worksop. Retford is approximately 8 miles east of Worksop and 20 miles south-east of Doncaster, in South Yorkshire. The RTCNP relates to Retford Town Centre, which had a resident population of approximately 750 in 2011. There are currently estimated to be some 487 dwellings, representing an increase of 115 new dwellings (31%) since 2011 in the Plan area. Retford Town Centre, categorised as a Core Service Centre in the Bassetlaw Core Strategy, includes a variety of shops and services, as illustrated on Map 4 Businesses in Retford Town Centre, in the RTCNP.
- 1.2 The Primary Shopping Area, shown on Map 5 of the RTCNP, sits at the heart of the town centre, extending from Market Place and Market Square down Carolgate to the junction with Wharf Road. Retford is one of the oldest market towns in England, receiving its charter in 1105, and benefitting from the re-routing of the Great North Road along Bridgegate and Carolgate in 1760. Most of the RTCNP area has Conservation Area

status, and there are many listed buildings and other significant heritage assets, as shown on Map 2 of the Plan. Chesterfield Canal forms the southern boundary of the Plan area, and the River Idle crosses the western side. Thus, blue infrastructure is an important characteristic of the area.

1.3 The Foreword to the RTCNP states that the Plan will seek to enable appropriate development, whilst retaining and enhancing those aspects of the town centre that make it an attractive business, residential and visitor location. Discussions at Retford Business Forum led to consultation with Bassetlaw District Council and informal surveys and consultations with the community during the period 2019 - 2021. These led to the formation of the RTCNPG in January 2021, and designation of the current Plan area by Bassetlaw District Council in September 2021.

## The Independent Examiner

- 1.4 As the Plan has now reached the examination stage, I have been appointed as the examiner of the RTCNP by Bassetlaw District Council, with the agreement of the RTCNPG.
- 1.5 I am a chartered town planner and former government Planning Inspector, with prior experience of examining neighbourhood plans in Nottinghamshire and more widely. I am an independent examiner, and do not have an interest in any of the land that may be affected by the draft Plan.

#### The Scope of the Examination

- 1.6 As the independent examiner I am required to produce this report and recommend either:
  - (a) that the neighbourhood plan is submitted to a referendum<sup>1</sup> without changes; or
  - (b) that modifications are made and that the modified neighbourhood plan is submitted to a referendum; or
  - (c) that the neighbourhood plan does not proceed to a referendum on the basis that it does not meet the necessary legal requirements.
- 1.7 The scope of the examination is set out in Paragraph 8(1) of Schedule 4B to the Town and Country Planning Act 1990 (as amended)('the 1990 Act'). The examiner must consider:
  - Whether the plan meets the Basic Conditions.

<sup>1</sup> As this is a Neighbourhood Business Plan, reflecting that the area has a high proportion of business interests, both residents and non-domestic rate payers get an opportunity to vote in referendums.

- Whether the plan complies with provisions under s.38A and s.38B of the Planning and Compulsory Purchase Act 2004 (as amended) ('the 2004 Act'). These are:
  - it has been prepared and submitted for examination by a qualifying body, for an area that has been properly designated by the local planning authority;
  - it sets out policies in relation to the development and use of land;
  - it specifies the period during which it has effect;
  - it does not include provisions and policies for 'excluded development'; and
  - it is the only neighbourhood plan for the area and does not relate to land outside the designated neighbourhood area.
- Whether the referendum boundary should be extended beyond the designated area, should the plan proceed to referendum.
- Such matters as prescribed in the Neighbourhood Planning (General) Regulations 2012 (as amended)('the 2012 Regulations').
- 1.8 I have considered only matters that fall within Paragraph 8(1)of Schedule 4B to the 1990 Act, with one exception. That is the requirement that the Plan is compatible with the Human Rights Convention.

#### The Basic Conditions

- 1.9 The 'Basic Conditions' are set out in Paragraph 8(2) of Schedule 4B to the 1990 Act. In order to meet the Basic Conditions, the neighbourhood plan must:
  - Have regard to national policies and advice contained in guidance issued by the Secretary of State;
  - Contribute to the achievement of sustainable development;
  - Be in general conformity with the strategic policies of the development plan for the area;
  - Be compatible with and not breach European Union (EU) obligations (under retained EU law)<sup>2</sup>; and
  - Meet prescribed conditions and comply with prescribed matters.
- 1.10 Regulation 32 of the 2012 Regulations prescribes a further Basic Condition for a neighbourhood plan. This requires that the making of the

<sup>&</sup>lt;sup>2</sup> The existing body of environmental regulation is retained in UK law.

Neighbourhood Development Plan does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017.<sup>3</sup>

## 2. Approach to the Examination

## Planning Policy Context

- 2.1 The Development Plan for this part of Bassetlaw District Council, not including documents relating to excluded minerals and waste development, is the Bassetlaw Core Strategy 2011. The District Council submitted a new Bassetlaw Local Plan to the Secretary of State for examination in July 2022. Following the examination, the Inspector's report was published in March 2024. The Inspector found that the Plan was sound and, subject to main modifications being made, the Local Plan could be adopted. The Plan is to be considered by full Council later in 2024, prior to adoption.
- 2.2 Although a draft neighbourhood plan is not tested against the policies in an emerging local plan, the reasoning and evidence informing the local plan process is likely to be relevant to the consideration of the Basic Conditions against which a neighbourhood plan is tested. Accordingly, the RTCNPG has provided helpfully an assessment of the RTCNP against both the extant and emerging new Local Plan (including the August 2023 Main Modifications) in the Basic Conditions Statement.<sup>4</sup> In doing so, it would appear that Bassetlaw District Council and RTCNPG have sought to work together to produce complementary neighbourhood and local plan policies, minimising any conflicts between policies in the Neighbourhood Plan and those in the emerging Local Plan.<sup>5</sup>
- 2.3 The planning policy for England is set out principally in the National Planning Policy Framework (NPPF). The PPG offers guidance on how this policy should be implemented. All references in this report are to the December 2023 version of the NPPF and its accompanying PPG.

## **Submitted Documents**

- 2.4 I have considered all policy, guidance and other reference documents I consider relevant to the examination, including:
  - the draft RTCNP 2022 -2038, [November 2023];
  - Map 1 of the Plan which identifies the area to which the proposed Neighbourhood Development Plan relates;
  - the Consultation Statement, [November 2023];

<sup>&</sup>lt;sup>3</sup> This revised Basic Condition came into force on 28 December 2018 through the Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations 2018.

<sup>&</sup>lt;sup>4</sup> See paragraph 1.55 and Table 3.

<sup>&</sup>lt;sup>5</sup> See PPG Reference ID: 41-009-20190509.

- the Basic Conditions Statement, [November 2023];
- the Strategic Environmental Assessment (SEA) and Habitat Regulations Assessment (HRA) Screening Statement prepared by Bassetlaw District Council [December 2023];
- the Design Code, [August 2022];
- the Retford Town Centre Masterplan, [January 2023];
- the Housing Needs Assessment, [October 2022];
- the Site Options and Assessment Report, [January 2023];
- the Ecology Study, [September 2022];
- the Ecological Assessment, [July 2022];
- all the representations that have been made in accordance with the Regulation 16 consultation; and
- the response of 18 April 2024 from the RTCNPG to my letter of 26 March 2024.<sup>6</sup>

#### Site Visit

2.5 I made an unaccompanied site visit to the Neighbourhood Plan area on 20 March 2024 to familiarise myself with it, and to visit relevant sites and areas referenced in the Plan and evidential documents.

#### Written Representations with or without Public Hearing

2.6 This examination has been dealt with by written representations. I considered hearing sessions to be unnecessary as the consultation responses clearly articulated objections to and comments on the Plan and presented arguments for and against the Plan's suitability to proceed to a referendum.

#### **Modifications**

2.7 Where necessary, I have recommended modifications to the Plan (**PMs**) in this report in order that it meets the Basic Conditions and other legal requirements. For ease of reference, I have listed these modifications separately in the Appendix.

#### 3. Procedural Compliance and Human Rights

#### Qualifying Body and Neighbourhood Plan Area

3.1 The RTCNP has been prepared and submitted for examination by Retford Town Centre Neighbourhood Plan Group, as the designated Neighbourhood Forum (and thus the 'Qualifying Body'). Both the Neighbourhood Plan area and Forum were initially designated by Bassetlaw District Council on 4 March 2021. However, the area designation was subsequently extended to incorporate the full extent of

<sup>&</sup>lt;sup>6</sup> View at: <a href="https://www.bassetlaw.gov.uk/planning-and-building/planning-services/neighbourhood-plans/all-neighbourhood-plans/retford-town-centre-neighbourhood-plan/">https://www.bassetlaw.gov.uk/planning-and-building/planning-services/neighbourhood-plans/all-neighbourhood-plans/retford-town-centre-neighbourhood-plan/</a>

Bridgegate and environs, and the modified area as approved by Bassetlaw District Council on 23 September 2021 is shown on Map 1 of the RTCNP. The Neighbourhood area has been designated as a business area, in recognition of the high proportion of business interests in the town centre.

3.2 The Retford Town Centre Neighbourhood Plan is the only Neighbourhood Plan for Retford Town Centre and does not relate to land outside the designated Neighbourhood Plan area.

#### Plan Period

3.3 The Plan specifies clearly the period to which it is to take effect, which is from 2022 to 2038.

#### Neighbourhood Plan Preparation and Consultation

- 3.4 The Foreword to the RTCNP advises that the desire for a consistent agreed view of the future development of the town centre came from discussions at Retford Business Forum. Consultation with Bassetlaw District Council led to a number of informal surveys and consultations during 2019 and 2020, followed by the formation of the RTCNPG in 2021. With support from planning consultants and other professionals, work on Design Codes, a Masterplan, Housing needs and site assessment, and Ecology, were undertaken.
- 3.5 Despite the restrictions imposed by the Covid pandemic, the RTCNPG engaged with the local community and carried out a full programme of public consultation. As paragraph 16 of the Plan reports, the RTCNPG focused on issues that mattered to businesses and local people, as well as visitors to the town centre, and used a variety of engagement methods including a market stall, school visits (once Covid restrictions were lifted), meetings with local groups and business breakfasts. Social media and the RTCNPG website were also used to encourage engagement. The Consultation Statement describes the Pre-Regulation measures taken from 2021 onwards, and its Appendix A shows a Press Release made in September 2021 which describes the Group's availability for communication and sets out a draft Vision and Community Objectives for consideration.
- 3.6 Early consultation on the proposed Plan led the RTCNPG to consider an extension to the Plan area as had been designated in March 2021. The proposed extension, to add land at Bridgegate to the west of the town centre, was the subject of a flyer in May 2021, and positive consultation responses led to designation of the extended area by the District Council in September 2021.
- 3.7 The Consultation Statement describes the consultation mechanisms used between 2021 and early 2023 to engage with local people and businesses. In March 2023, the Plan was reviewed in preparation for the statutory Regulation 14 consultation, and this took place from 24 July to 8

September 2023. Three public events were held in late July and August at Retford Town Hall, enabling local people to view all planning documents and hold discussions with representatives of the RTCNPG and the District Council's Neighbourhood Planning Team. The Consultation Statement indicates that responses from 4 residents and 16 statutory consultees were received at the Regulation 14 stage.

3.8 The Consultation Statement sets out in detail the RTCNPG's comments on the points raised by all respondents to the Regulation 14 version of the Plan. It indicates that a number of amendments to the Neighbourhood Plan were consequentially made. Following submission to Bassetlaw District Council, the revised Plan was subject to further consultation under Regulation 16 between 4 January and 14 February 2024. I have taken account of the responses from 9 parties which were then submitted. I am satisfied that the consultation process has met the legal requirements, notably procedural compliance, and has had regard to advice in the PPG on plan preparation and engagement.

## Development and Use of Land

3.9 The Plan sets out policies in relation to the development and use of land in accordance with s.38A of the 2004 Act.

## **Excluded Development**

3.10 The Plan does not include provisions and policies for 'excluded development'.<sup>7</sup>

#### **Human Rights**

3.11 The Basic Conditions Statement (at paragraph 1.50) reports that the Plan has had regard to and is compatible with the fundamental rights and freedoms guaranteed under the European Convention on Human Rights. Bassetlaw District Council, in its Strategic Environmental Assessment (SEA) & Habitat Regulations Assessment (HRA) Screening Statement, December 2023, and elsewhere, has not asserted that the Plan would breach Human Rights (within the meaning of the Human Rights Act 1998), and from my independent assessment, I see no reason to disagree.

#### 4. Compliance with the Basic Conditions

#### **EU Obligations**

4.1 The Neighbourhood Plan was screened for Strategic Environmental Assessment by Bassetlaw District Council, which found that it was unnecessary to undertake a full SEA. Having read the Council's SEA

<sup>&</sup>lt;sup>7</sup> The meaning of 'excluded development' is set out in s.61K of the 1990 Act.
Intelligent Plans and Examinations (IPE) Ltd, 3 Princes Street, Bath BA1 1HL

- Screening Opinion in the Strategic Environmental Assessment & Habitat Regulations Assessment Screening Statement, December 2023, I support this conclusion
- 4.2 The RTCNP was further screened for HRA by Bassetlaw District Council, as reported in the above document. The screening assessment considered likely effects on the Birklands and Bilhaugh Special Area of Conservation (SAC), and the Sherwood Forest possible potential Special Protection Area (ppSPA). The District Council concluded that implementation of the Neighbourhood Plan would not have significant effects on these identified European sites. This view was supported by the Environment Agency, Historic England and Natural England, following their consultation between 27 October and 1 December 2023. From my independent assessment of this matter, I have no reason to disagree.

#### Main Issues

4.3 Having regard for the RTCNP, the consultation responses, other evidence and the site visit, I have approached the assessment of compliance with the Basic Conditions of the Retford Town Centre Neighbourhood Plan on a chapter-by-chapter basis.

#### Foreword, Chapters 1 and 2

4.4 Following the Foreword, which provides useful information about the origin and purpose of the Neighbourhood Plan, Chapter 1 explains that the Plan has been produced in accordance with the Localism Act 2011 ('the 2011 Act')<sup>8</sup> by the RTCNPG who, as noted, are the Qualifying Body. The Plan has been developed in general conformity with strategic policies in Bassetlaw's Core Strategy, with national policy in the NPPF, and with Nottinghamshire County Council's policies. The evidence base for the emerging Bassetlaw Local Plan has been used to support the Neighbourhood Plan, as detailed in paragraph 8 of the RTCNP, and Plan area based studies commissioned by the RTCNPG are listed in paragraph 9. The time frame for the Neighbourhood Plan, to 2038, is the same as for the emerging Local Plan. Map 1 shows the designated Plan area. Chapter 2 explains the need for a neighbourhood plan, focusing on the heart of the Town, making sure it will meet future needs of the wider Retford built-up area, which will have a growing population. I consider that Chapters 1 & 2 provide a good introduction to the Neighbourhood Plan, are helpful for readers and demonstrate compliance with the Basic Conditions for neighbourhood planning.

# Chapters 3 and 4

4.5 Chapter 3 addresses Consultation, recognising that this is key to involving a wide range of people from across the area and developing an

 $<sup>^8</sup>$  The 2011 Act makes various amendments to the principal planning legislation to provide the framework for neighbourhood planning – in particular see Section 1.6 to 1.10 above.

appropriate plan for the town centre. Chapter 4 is headed Community Aspirations, stating that a number of initiatives have been identified and fed into the Vision for Retford. A number of these are not planning policy matters, but have been set out as Community Aspirations in Appendix A. I support the separation of the aspirations (which begin with the design of street furniture to enhance the visual coherence of the town centre), from the main body of the Neighbourhood Plan, so that they are not confused with the key planning policies.<sup>9</sup>

## Chapter 5

4.6 Chapter 5 briefly describes some of the main features in Retford's history, beginning with the fact that the name "Retford" was derived from the red colour of the local clay. More information follows about the town's location and context, including the Square with its Georgian origins, now used for a market on three days a week.

## Chapter 6

4.7 Reminding readers that this is a business led Neighbourhood Plan, Chapter 6 is titled Boosting the Town Centre Economy. Figure 1, How the Neighbourhood Plan policies boost the town centre economy, helpfully, in my opinion, highlights key factors that should help the town centre economy. These range from "adapt to climate change, from use of solar energy to greening the streets" to "make the town centre more attractive for businesses and residents", and "make the most of the River and Canal". STEP - Looking to the Future is referenced in Chapter 6, as the UK Atomic Energy Agency (UKAEA) has recently chosen the nearby Burton Power Station for its Spherical Tokamak for Energy Production (STEP), aimed at generating low carbon, clean energy. This could transform and regenerate the area, creating thousands of jobs over the medium to longer term future, with the site up and running by 2040. I consider that Chapter 6 adopts a positive and supportive approach to future economic growth and change, in accordance with the Basic Conditions for neighbourhood planning.

#### Chapters 7 and 8

4.8 Chapter 7 describes the Community Vision prepared by the RTCNPG following consultation events. I consider that the Vision is a fair and inclusive reflection of the needs and wishes of local residents and businesses. It aims to safeguard heritage assets, reduce the carbon footprint and make Retford Town Centre an appealing place to live, learn, develop, work and spend quality leisure time. Chapter 8 then describes eight Community Objectives, which stem logically from the Vision in my view, and are clearly set out. I am satisfied that the Vision and Objectives are in general conformity with the Bassetlaw Core Strategy, notably with Policy CS3 Retford; Policy DM4 Design and Character; Policy DM8 The

<sup>&</sup>lt;sup>9</sup> See PPG Reference ID: 41-004-20190509.

Historic Environment; and Policy DM10 Renewable and Low Carbon Energy. There is also consistency with Policies ST13 Town Centres, Local Centres, Local Shops and Services; ST35 Design Quality; ST42 and ST43 The Historic Environment and Heritage Assets; and ST51 Reducing Carbon Emissions, Climate Change and Adaption in the new emerging Bassetlaw Local Plan. The Vision and Objectives in the RTCNP should assist the achievement of sustainable development in Retford.

## Chapter 9

4.9 Chapter 9, Engaging with the Community: A Key Principle, refers to paragraph 39 of the NPPF, which encourages early engagement between applicants for planning permission with the local community, as well as statutory and non-statutory consultees. In my letter of March 2024 to the RTCNPG, I gueried whether the Plan should distinguish between consultation at the plan-making stage, as described in paragraphs 15-16 of the NPPF, and engagement when planning applications are made. Planning decisions are made by the local planning authority (Bassetlaw District Council) and not the RTCNPG. As was pointed out to me, Chapter 3 of the Plan addresses consultation at the plan-making stage. I note that chapter 9 describes its Key Principle as a "voluntary process" rather than a policy requirement, and also that the District Council has not objected to this part of the Plan. After further reflection, I consider that the Key Principle, with its "encouragement" to applicants, should be a useful reminder for those contemplating new development, and am content that no modification to the chapter is necessary in order to satisfy the Basic Conditions.

#### Chapter 10

4.10 Chapter 10, A Masterplan for Retford Town Centre, alerts readers to this supporting document which describes blue and green corridors, the transport network and infrastructure, and future potential regeneration sites. Figure 2 helpfully illustrates key corridors, routes and sites in the town centre area, and should assist readers and users of the Neighbourhood Plan.

#### Planning Policies

4.11 Chapters 11 – 23 contain the planning policies which should be applied to achieve the Plan's Vision and Objectives over the plan period.

## Chapter 11

4.12 Chapter 11, Protecting and Enhancing Heritage Assets, includes Map 2, showing the extent of the Conservation Area and the location of listed buildings, together with positive buildings which have been identified by the District Council's conservation team as having local historic and/or architectural value. Map 2 largely replicates Map 37 of the Retford Conservation Area Appraisal (CAA) from May 2012. However, the

RTCNPG advised, in response to my questions of March 2024, that Map 2 includes additional updated information, and shows the location of significant boundaries which are included in Map 27 of the Appraisal. The RTCNPG proposed that Maps 27 and 37 should be referenced in the Neighbourhood Plan and clarification be given that Map 2 has been updated since 2012, when the CAA was produced. I recommend that paragraph 50 of the RTCNP is modified to explain the basis for Map 2 more precisely and to contribute to the achievement of sustainable development, as in Proposed Modification 1 (**PM1**).

4.13 The text preceding <u>Policy 1</u> helpfully points out that a balance has to be struck between encouraging the maximum use of all buildings in the Plan area and protecting the heritage of buildings. Policy 1 Protecting and Enhancing Heritage Assets sets out five criteria which should be addressed when development is proposed. The policy and its supporting text will refer readers to relevant background evidence, notably the Retford CAA and Management Plan, and Retford Design Code. The CAA predates the Design Code and I recommend that Policy 1 should clarify that it was produced in 2012, as in **PM1.** With that modification in place, I conclude that Policy 1 will satisfy the Basic Conditions for neighbourhood planning.

## Chapter 12

- 4.14 Chapter 12, Achieving Well Designed Places, begins by alerting readers to the NPPF's requirement for good design, and the Retford Design Code 2022, prepared by AECOM and the local community. The Design Code, as illustrated in Figure A of the RTCNP, defines six character areas within the town centre. Figures A (1) A (6) show the location and key features of each key area, and I was able to confirm at my site visit that the key areas are distinctive and appropriately defined. After Figures A (1) A (6), paragraphs 58-64 provide useful guidance for potential developers and five themes, beginning with building heights & roofs, from section 4 of the Design Code. I am satisfied that this provides good justification for the following Policy 2 Achieving Well Designed Places. However, I recommend a modification should be made to paragraph 56, to refer to 6 (not 7) character areas, for consistency with Figure A. Also the reference to "Canon Square" on Figure A(4) and elsewhere in the Plan should be changed to "Cannon Square". PM2 should be made accordingly.
- 4.15 Policy 2, Achieving Well Designed Places, sets out a number of criteria which new development should achieve, with reference to the Retford Design Code. The policy requires developers to: consider the local character of the immediate area, the scope for providing street trees, the use of materials, roof form, scale and massing, window size and architectural details and boundary treatment suitable for local character; maximise opportunities to integrate with the canal, river and public open spaces; adopt good landscaping schemes to create attractive streets and

 $<sup>^{10}</sup>$  Modifications for the purpose of correcting errors is provided for in Paragraph 10(3)(e) of Schedule 4B to the 1990 Act.

green spaces and maximise wildlife benefits; and provide direct and safe access for pedestrians and cyclists, with safe street parking and servicing arrangements. I support this comprehensive set of criteria, which should contribute to the achievement of high quality design and sustainable development. The RTCNPG agreed with my suggestion that modification was needed to criterion 2 i) of the policy, so that its meaning, to secure safe access to places where off-street parking and servicing arrangements have been provided, is clear. **PM3** should be made so that the policy can be effectively applied and will satisfy the Basic Conditions.

## Chapter 13

4.16 Significant views are addressed in Chapter 13 and illustrated in Map 3. Relevant photographs and descriptions of views are given in Appendix C. I appreciate from my site visit the case for retaining these significant views. Policy 3 Protecting Significant Views contains two criteria, and I expressed concern in my letter of March 2024 to the RTCNPG that the first criterion amounts to justification text rather than policy. Following the Group's agreement, I propose that Policy 3 is modified, and criterion 1 is moved to paragraph 67, as in **PM4.** This is necessary for the effectiveness of Policy 3 so that it will contribute to the achievement of sustainable development.

## Chapter 14

- 4.17 Chapter 14, Improving the Public Realm, helpfully in my opinion defines what is meant by public realm, and refers to three significant areas in the town centre, namely The Square, Carolgate and Cannon Square. The Plan then sets out four measures which public consultation, the Design Code and Ecology Study have identified as beneficial. These include measures such as planting to assist in mitigating the effects of climate change; seating and planting to provide amenity space for visitors and residents; diversifying the commercial offer by creating spaces for more activities; and enhancing the town centre as a destination (longer dwell time should increase visitor spending). I consider that paragraphs 68 & 69 provide excellent explanatory text for the improvement policies, Policies 4a, b & c, which follow.
- 4.18 Policy 4a, Improving The Square, supports its future use for community events and other social activity, recognising its primary function as a marketplace, and the significance of its heritage assets. The policy also aims to achieve a reduction in vehicular movements along Market Place to the bridge, and achieve a shift towards pedestrian and cycle movement over vehicular movement through The Square. I support the policy for this significant site, at the heart of Retford Town Centre. I also consider that Policy 4b, to enable safer pedestrian and cycle movement around Cannon Square and secure environmental improvements, should be beneficial. Policy 4c relates to Carolgate, which is the primary shopping area in Retford Town Centre. The policy supports improvements to the environment for pedestrians, with new paving that reflects the historic

character. I conclude that these policies should encourage an environment in the town centre supportive of economic growth and social enjoyment, with a cleaner environment and protection of heritage. I am satisfied that Policies 4a, b & c comply with the Basic Conditions for neighbourhood planning.

## Chapter 15

- 4.19 Chapter 15, Maintaining the Vitality and Vibrancy of the town centre, begins with Map 4 which shows the prevalence of businesses in the town centre. Retail is predominant, but there is a diversity of commercial uses. Map 5 shows the Primary Shopping Area, which aligns with the area defined in the emerging new Bassetlaw Local Plan. Policy 5a, Acceptable Uses in the town centre, is supportive of applications for retail development within Class Ea. Class Ea applies to premises "for the display or retail sale of goods, other than hot food, principally to visiting members of the public". Bassetlaw District Council, in its comments at the Regulation 16 consultation stage, proposed that the policy could be amended to include applications for development at ground level within Class E, as this could enhance the vitality of the town centre. I note that change of use of premises from Class Ea to other commercial, business and service uses within Classes Eb - Eq could generally be implemented without the need for planning permission. Paragraphs 89-90 of the supporting text clarify this and refer to the NPPF definition of town centre uses. I have taken account of the District Council's comments and considered whether the policy could be overly restrictive, denying developments which could enhance the vitality of the town centre. However, I am satisfied that Policy 5a with the national policy framework should provide opportunities for growth and adaptation and secure the vitality of the town centre.
- 4.20 <u>Policy 5b</u> sets out criteria for new shop frontages to strengthen the visual coherence of the town centre and uphold the character of the Conservation Area. I am satisfied with Policy 5b, and the aim to support creative industries as described on Pages 38-39. <u>Policy 5c</u> Improving Broadband and Mobile Connectivity has regard to national planning policy as set out in section 10 of the NPPF, in my opinion, and the supporting text to Policy 5c helpfully refers to Government policy. The RTCNP also aligns with emerging Policy ST57 of the Bassetlaw Local Plan. Overall, I am therefore satisfied that Policies 5a 5c meet the Basic Conditions.

#### Chapter 16

4.21 Protecting and Enhancing Biodiversity is the subject of Chapter 16. Map 6 Landscape Designations provides useful information for readers regarding trees, the canal, open spaces and pedestrianised areas. An important focus is to encourage more coherent landscape planting and management. This aligns with sections 12 and 15 of the NPPF, and with Policy ST50 of the emerging new Local Plan, as mentioned in paragraphs 110-111 of the RTCNP. The supporting text provides substantive information of the

evidence base for <u>Policy 6a</u> Greening the Streets. Bassetlaw Council commented at the Regulation 16 consultation stage that criterion 1 may not be applicable to small development proposals, eg. for a single dwelling. As the opening sentence begins "As appropriate to their scale, nature and location ...", I am satisfied that the policy should not be too restrictive. The RTCNPG also clarified the wording of paragraph 117, which should state that there is not a loss of tree canopy and, where possible, a net gain. I propose that the wording is modified as in **PM5** so that the Plan's intentions are clear, and to contribute to the achievement of sustainable development.

4.22 Paragraphs 119 and 120 inform the reader that the River Idle and Chesterfield Canal are identified in Policy ST39 of the emerging Local Plan as "main corridors" with 30m buffer zones reflecting their ecological value. Maps 8a and 8b in the RTCNP, from ecology reports by the East Midlands Environmental Consultants, demonstrate the potential for enhancing biodiversity and climate resilience in the Plan area. Policy 6b, Protecting and Enhancing Biodiversity, seeks at least 10% net biodiversity gain from development proposals (of an appropriate scale, nature and location), in line with national planning policy. The policy seeks the inclusion of Sustainable Drainage Systems where appropriate, and I consider that Policy 6b should contribute to the achievement of sustainable development.

## Chapter 17

4.23 Chapter 17, Improving the Canal and River Corridors (Blue Infrastructure), includes Policy 7. I note the Environment Agency's support for the requirement for an 8m easement from the river banks. Regarding criterion 3, I consider that this should apply to development likely to have an effect on footfall alongside the Chesterfield Canal and River Idle. So that it does not impose undue expectations on minor development at some distance from the blue infrastructure and having read the RTCNPG's response to my letter of March 2024, I recommend rewording of the policy as in PM6. I also recommend the rewording of paragraph 128, as this may appear overly onerous to minor development. PM6 should be made so that Policy 7 and its supporting text satisfy the Basic Conditions.

#### Chapter 18

4.24 Chapter 18, Significant Green Areas, explains that the Plan area's significant green areas have a variety of functions from wildlife value and visual benefit to climate change mitigation. The Significant Green Areas shown on Map 9 were identified in the Conservation Area Character Appraisal, and at my site visit, I was able to appreciate their contribution. I support Policy 8, although, as mentioned in my letter to the RTCNPG in March 2024, I consider that criterion 1 should be merged with paragraph 133 as it amounts to justification text rather than policy. Modification

**PM7** should be made to secure this and ensure that the policy meets the Basic Conditions.

## Chapter 19

- Chapter 19, Getting Around the Town Centre, begins with Map 10a Vehicular Movement which shows the road hierarchy, public car parking spaces, the bus station and railway station (outside the designated Plan area). Map 10b follows and is titled Assessment of Safety of Roads in the Plan area for Cyclists (done by a local cyclist and member of the RTCNPG). In response to the Regulation 16 consultation, Nottinghamshire County Council stated that the safety and appropriateness of highway facilities and routes should be assessed by a competent highway official, taking account of appropriate design standards and the reported safety record. In response to my letter of March 2024, the RTCNPG advised that, in addition to the local resident/cyclist who had contributed to Map 10b, another cyclist who is Group Coordinator for Sustrans Bassetlaw Rangers had also produced a written cycling plan. In addition, Tetra Tech<sup>11</sup> had produced a Grey to Green – Retford and Cycling Audit June 2021 as evidence for the emerging Bassetlaw Local Plan. I accept that evidence from local, well-informed people can be useful for neighbourhood planning, and am content with Map 10b as it clearly explains its basis. I also agree with the RTCNPG that a footnote should be added to provide a reference to the Grey to Green - Retford and Cycling Audit June 2021. **PM8** should be made to secure this and achieve compliance with the Basic Conditions.
- 4.26 The absence of a north-south link through the town centre is described as the single most significant obstacle for cyclists. Nottinghamshire County Council advised that a proposed north/south route through the town centre has been identified as a potential long-term project. Map 10d shows a Suggested cycle route, extracted from the town centre Masterplan, which I consider should assist cyclists travelling from the north to south. Nottinghamshire County Council advised that the adopted D2N2 (Local Enterprise Partnership for Derby, Derbyshire, Nottingham and Nottinghamshire) Local Cycling and Walking Infrastructure Plan (LCWIP), setting out the County's aims and strategies, includes improved north/south cycle connections in Retford. Whether this is a short-term priority or longer-term aim, I consider that it should be referenced in the RTCNP. Paragraph 149 of the Plan describes Arlington Way (A638) as a busy trunk road. The County Council observed that this is not in fact a trunk road, and I recommend that the text should be corrected, as recommended in PM8, so that readers are not misinformed. I further recommend in PM8 the inclusion of a new sentence in paragraph 149 to refer to the LCWIP.
- 4.27 The County Council also queried the feasibility of extending the corridor from Spa Road across Carolgate and along West Street, given the cycling

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<sup>&</sup>lt;sup>11</sup> Formerly known as WYG.

ban on Carolgate. However, as the Plan extends to 2038, I am content for the aspiration to be retained. Policy 9, Extending the Footpath and Cycle Routes, supports development which would extend the cycle and footpath network. I consider that this policy should enable more sustainable travel through the town centre, and thus contribute to the achievement of sustainable development. The RTCNPG, in its letter to me of April 2024, stated that Map 10d Suggested cycle routes could show more clearly the Plan's ambitions for an improved east-west pedestrian route with improved signage, street design and more street trees. The map is an extract from the Town Centre Masterplan and I recognise that it provides support for Policy 9, which includes 9c) the connection between Spa Road and West Street. However, I agree that the map could be enhanced as a minimum to include Spa Road, as mentioned in Policy 9. I recommend that a revised Map 10d should be made, as in **PM8**.

4.28 In my letter of March 2024, I asked whether the Neighbourhood Plan should say more about penetration for bus services, including access to the bus station and bus stops. I accept the RTCNPG response that the Plan would not restrict access to the bus station, owned and managed by Nottinghamshire County Council, or to bus services. I see no conflict with Policy ST14 Management of Town Centres in the emerging Local Plan, and do not recommend modifications to the Neighbourhood Plan concerning bus services. Also, I agree that the Plan does not need to include additional information about taxi services. I am encouraged to read that the Community Aspirations 2 and 3 in Appendix A of the Plan are for future work between the RTCNPG, Bassetlaw District Council and Nottinghamshire County Council to achieve a good balance between pedestrian and vehicular movement. This future work could include the role of buses, community transport services and taxis in securing sustainable development.

#### Chapter 20

Chapter 20, Housing in the Town Centre, begins with a brief summary of the housing character in the Neighbourhood Plan area. I raised concerns about the use of terminology with the RTCNPG in my letter of March 2024, and consequently recommend that use of the term "NA" be deleted from paragraphs 153, 155, 165, 168 and elsewhere in the Plan, and replaced with "Town Centre". This should provide clarity for readers and users of the Plan. References to the Housing Needs Assessment (HNA), first mentioned in paragraph 153, should also be explained more fully. This should be achieved by extending footnote 28 to refer to the Retford Town Centre Housing Needs Assessment by AECOM, October 2022. I appreciate that the study by AECOM is an important evidence document for the Neighbourhood Plan. It makes reference to strategic housing policies in the Bassetlaw Core Strategy (notably Policy CS3) and in the emerging Local Plan (Policy ST1). I consider that the modifications proposed in PM9, including the correction to the wheelchair user standards - M4(3) in paragraph 171, are needed for general conformity with strategic planning policies and for clarity.

- Map 11, Residential Properties in the Plan area, clearly demonstrates where housing is located in the town centre, around the major retail, business and community facilities. The Neighbourhood Plan states that the town centre is not expected to achieve a specific target for new housing but, commendably in my view, the Plan acknowledges that there is potential for additional housing development. Using data from the AECOM Housing Needs Assessment, paragraphs 155-176 describe needs related to housing size, affordability and demographics/specialist needs. This information should help those proposing new housing development in the town centre. I referred in my letter to the RTCNPG that the District Council had questioned the need to include percentages of housing mix in Policy 10a as most of the housing schemes coming forward were likely to be flat conversions in Flood Zones. Also, I found Policy 10a confusing as the "most up to date Housing Needs Assessment" could give variable targets over the plan period to 2038. The policy, however, implies specific targets of 50% 1 or 2 bed dwellings, 35% 3 bed and 15% 4 plus beds. The RTCNPG was unhappy with my proposed addition of "currently" to criterion 1 of this policy, which I understand. I have proposed rewording the policy as in **PM10**, to remove the numbers from criterion 1 and rely on the data given in paragraph 157. Secondly, I consider the policy needs to explain that major development means 10 or more homes or a site of 0.5 hectares or more, having regard for national planning policy.
- 4.31 I support the thrust of <u>Policy 10b</u>, Housing Tenure and <u>Policy 10c</u>
  Accommodation for Older People, as these follow logically from the description of housing needs earlier in the chapter. However, the District Council pointed out that Policy 10b should take account of viability and the provision of affordable housing. The RTCNPG accepts that viability may make desired levels of affordable housing unfeasible. The revised wording which I recommend in **PM10** combines the wording proposed by the District Council and RTCNPG. In addition, the reference to "topography and the proximity of everyday services" is a matter of justification text which should be removed from Policy 10c, especially as the point is already made in paragraph 175. In **PM10**, I recommend that this descriptive text is removed, so that Policy 10c is more direct and in accordance with the Basic Conditions.

#### Chapter 21

4.32 Chapter 21, Renewable Energy and Low Carbon Technologies, begins, appropriately in my view, with a reference to paragraph 152 of thew NPPF (now paragraph 157 of the most recent December 2023 NPPF) and other national-level studies. It refers to Policy ST50 of the emerging Bassetlaw Local Plan, which requires residential development to meet the water efficiency standard of 110 litres per person per day. I recommend modification of the last sentence of paragraph 179 to state that the policy is in the "emerging Bassetlaw Local Plan". I propose this modification in PM11. Policy 11 Renewable Energy, Energy Efficiency and Low Carbon Technologies is an ambitious but commendable policy. I questioned

whether it should be applied "where appropriate", so that it was not overly restrictive. However, the RTCNPG responded to my query, stating that it considered <u>all</u> development should incorporate sustainable design features. Having reviewed the matter, and recognising that the RTCNPG is keen to ensure that development achieves a step change in reducing the use of carbon, I propose no modification to Policy 11. I conclude that it should contribute to the achievement of sustainable development.

## Chapter 22

4.33 Chapter 22, Reducing the Risk of Flooding, begins with the statement that 50% of the Plan area lies in flood zones 2 or 3, as illustrated in Map 12. Paragraph 190 refers to liaison with the Environment Agency and advises that the flood zone map may need to be updated as outputs of the River Idle 2021 flood risk model become available. In the meantime, the text recommends that interested parties contact the Environment Agency to request flood risk date for sites/areas proposed for development. I consider this to be a sensible and cautionary approach. Policy 12 expects developers to follow a sequential approach to flood risk management, supports flood and surface water management measures, and supports green infrastructure provision to achieve net gains for nature where appropriate. Policy 12 should reduce risks of flooding in the town centre and contribute to the achievement of sustainable development.

## Chapter 23

Chapter 23, Regeneration and Site allocations, explains that the RTCNPG has sought to identify opportunities for future regeneration, including a Call for Sites in 2022. Six sites were identified, and the site assessment was confirmed following consultation with the local community. Policy 13a supports the renovation or redevelopment of Ebsworth Hall, subject to conditions including regard for the site's location within Retford Conservation Area and within the curtilage of a listed building. Policy 13b Land between Amcott Way, Bridgegate and River Lane supports mixed use development of the site, subject to flood risk assessment, design and access considerations etc. Thirdly, Policy 13c Redevelopment of Goodwin Hall and Registry Office Buildings, supports redevelopment for a mixed use scheme (housing and community uses), subject to flood risk assessment, regard for Retford Design Code, the provision of space and facilities indoors and outdoors for older and disabled people, biodiversity net gain, and safe and direct access to neighbouring roads. I commend the RTCNPG for their positive approach, planning for these regeneration schemes, and specifying the conditions which should ensure that beneficial and sustainable development is achieved.

#### Chapters 24 and 25

4.35 Chapter 24, Implementation, helpfully explains the role of the District Council, responsible for development management, and refers to the role which the voluntary and community sector can play, as well as the

RTCNPG and (when adopted) the Neighbourhood Plan. Chapter 25 Monitoring and Review commits to ongoing assessment and review if necessary. I consider that these two final chapters demonstrate a commitment by the RTCNPG to shaping the future of the town centre, based on good planning, and they have my support. There is an error in paragraph 239 which could confuse readers, and I recommend that the word "Council" at the end of the paragraph is removed, as in **PM12.** 

#### Appendices A-C

4.36 Appendices A Community Aspirations, B Reports Commissioned for the RTCNP, and C Key Views include useful supportive information which should assist readers of the Plan and enhance their understanding as to how the Vision, Objectives and policies have been developed and should be taken forward.

#### Other Matters

#### Minor Amendments

4.37 As an advisory comment, in reading the draft Plan I noted there are a number of very minor typographical errors. When the Plan is being redrafted to take account of the recommended modifications in this report, it should be re-checked for any such typographical errors and any other consequential changes. Minor amendments to the text and numbering (sections, paragraphs etc.) can be made consequential to the recommended modifications, alongside any other minor non-material changes or updates that might be agreed in liaison between the RTCNPG and the District Council.

## References to the NPPF

- 4.38 A number of specific NPPF paragraph references in the RTCNP are out-of-date because a revised version of the NPPF was published in December 2023 (see paragraph 2.3 above). Although changes to the NPPF (as they relate to the RTCNP) were minimal, it is nevertheless important that references to the NPPF reflect the contents of the most recent edition. This is particularly notable in the Plan as follows:
  - Footnote 16 (page 17), NPPF paragraph 207 should be referenced (replacing paragraph 202);
  - Footnote 17 (page 18), NPPF paragraph 139 (replacing paragraph 134);
  - Footnote 23 (page 42), NPPF paragraph 136 (replacing paragraph 131);
  - Plan paragraph 177 (page 65), NPPF paragraph 157 (replacing paragraph 152);

- Plan paragraph 183 (page 66), NPPF paragraph 160 c) (replacing paragraph 155 d)); and
- Plan paragraph 189 (page 70), NPPF paragraph 173 (replacing paragraph 167).

I therefore recommend in **PM13** that all references to the NPPF in the RTCNP relate to the latest December 2023 version.

#### 5. Conclusions

#### Summary

- 5.1 The RTCNP has been duly prepared in compliance with the procedural requirements. My examination has investigated whether the Plan meets the Basic Conditions and other legal requirements for neighbourhood plans. I have had regard for all the responses made following consultation on the RTCNP, and the evidence documents submitted with it.
- 5.2 I have made recommendations to modify a number of policies and text to ensure the Plan meets the Basic Conditions and other legal requirements. I recommend that the Plan, once modified, proceeds to the two statutory referendums.

## The Referendums and Neighbourhood Planning Area

5.3 As this is a Neighbourhood Business Plan, it is necessary to conduct two referendums for business and domestic purposes. I have considered whether or not the referendums' area should be extended beyond the designated area to which the Plan relates. The RTCNP, as modified, has no policy or proposals which I consider significant enough to have an impact beyond the designated Neighbourhood Plan boundary, requiring the referendums to extend to areas beyond the Plan boundary. I recommend that the boundary for the purposes of any future referendums on the Plan should be the boundary of the designated Neighbourhood Plan area.

#### Overview

I appreciate the hard work which the RTCNPG has put into producing this Neighbourhood Plan, especially as it began during the time of the Covid pandemic. The Plan is clearly focused on measures to achieve a vital and vibrant town centre for businesses, residents and visitors to the area. I am impressed by the positive approach taken towards prospective new development and growth in the town centre and more widely in Retford, as well as the measures put forward to address a wide range of other, potentially challenging, issues. The Plan gives due recognition to the town centre's heritage assets and the need for their protection, noticeably by way of good design of new developments. The aim to function as a modern town centre minimising its carbon footprint is taken forward in the

policies for protecting and enhancing biodiversity, reducing flood risk and improving the Canal and River corridors. Policies support renewable energy and energy efficiencies and extending footpath and cycle routes to enable more sustainable travel behaviour. I commend the Group for rigorously assessing all of these subjects which will shape the future of the town centre.

5.5 In addition, it is clear that the Group has endeavoured to engage with local people and businesses as well as the District Council and other organisations in developing its Plan. The Plan is clearly structured, relatively concise and straightforward to read. The maps, photos in the main body of the report and in Appendix C support the text and policies admirably. I congratulate the Group on producing a substantive document, which should help planning decision-makers (notably at the District Council) and lead to future high quality development in Retford Town Centre.

Jíll Kíngaby

Examiner

# Appendix: Modifications

| Proposed<br>modification<br>number (PM) | Page no./<br>other<br>reference | Modification   |
|---|---------------------------------|--|
| PM1                                     | Page 17                         | Paragraph 50   |
|   |                                 | Modify the first two sentences and last sentence as follows:   |
|   |                                 | The Retford ConservationPlan published in 2012 provides a detailed The maps in the Conservation Area Appraisal and Management Plan, in particular Maps 27 and 37, identify the listed buildingsThese boundaries, and the other heritage features, have been reviewed and updated and are shown on Map 2. |
|   |                                 | Policy 1 Protecting and Enhancing<br>Heritage Assets   |
|   |                                 | Modify as follows:   |
|   |                                 | 1. Development withinand Management Plan <b>2012</b> and the Retford Design Code 2022  |
| PM2 Pages 18 &                          | Paragraph 56                    |  |
|   | 23 & 31                         | Modify as follows:   |
|   |                                 | The Retford Design Codeinto <del>7-6</del> character areas   |
|   |                                 | Figure A(4)  |
|   |                                 | Modify as follows:   |
|   |                                 | Reference to <i>Cannon Square</i> not <del>Canon</del> <del>Square</del> at the head of paragraph 76; beneath Photo 3; and in Policy 4b, and elsewhere in the Plan.  |
| PM3                                     | Page 27                         | Policy 2 Achieving Well Designed Places  |
|   |                                 | Modify as follows:   |
|   |                                 | 2 i) provide safe access and to places where off street parking  |

| PM4 | Pages 27 &     | Policy 3 Protecting Significant Views   |
|-----|----------------|---|
|     | 29             | Delete criterion 1, and add the text to paragraph 67.   |
|     |                | Modify criterion 2 to read:   |
|     |                | 2. Proposals are required to demonstrate how they will respond to, conserve and enhance these significant views, identified on Map 3 and described in Appendix C, insofar as this will protect  |
| DME | D 42           | Davis and 117   |
| PM5 | Page 43        | Paragraph 117   |
|     |                | Modify as follows:  |
|     |                | There is community, national,net gain not a loss of tree canopy and where possible a net gain   |
| PM6 | Page 49        | Paragraph 128   |
|     |                | Modify as follows:  |
|     |                | Development is required to demonstrate at least a 10 per cent biodiversity net gain. Net gain should occur on the site and only in exceptional circumstances will off-site contributions be appropriate. Iit is expected that layout and landscaping schemes will takes every opportunity |
|     |                | Policy 7 Improving the Canal and River Corridors  |
|     |                | Modify as follows:  |
|     |                | 3. Development <i>adjacent to the River Idle or Chesterfield Canal</i> should contribute to the delivery  |
| PM7 | PM7 Pages 50 & | Paragraph 133   |
| 52  | 52             | Add the following sentence after the first sentence: The Significant Green Areas provide multi benefits for wildlife, climate change mitigation and contribute to the character of the Town Centre. The identification of   |

|     |                      | Policy 8 Significant Green Areas  |
|-----|----------------------|---|
|     |                      | Delete criterion 1 revise as follows:   |
|     |                      | 2. 1. In these Significant Green Areas shown on Map 9 development will be limited   |
| PM8 | Pages 55, 57<br>& 58 | Map 10b The Assessment of Safety of Roads in the Plan Area for Cyclists (done by a local cyclist and member of the RTCNPG)  |
|     |                      | Add a footnote to the map to reference the Grey to Green – Retford Walking & Cycling Audit 2021   |
|     |                      | Paragraph 149   |
|     |                      | Amend the last line to read:  |
|     |                      | Arlington Way (A638), which is a busy trunk-road.   |
|     |                      | Add a new sentence to the end of the paragraph:   |
|     |                      | Nottinghamshire County Council supports the growth of active travel and, along with other highway authorities in Derbyshire and Nottinghamshire, has adopted the D2N2LEP Local Cycling and Walking Infrastructure Plan (LCWIP). The proposal to create/improve north – south cycle connections in Retford is acknowledged in the LCWIP. |
|     |                      | Map 10d Revise the map titled<br>Suggested cycle route, to include a<br>reference to Spa Road and illustrate the<br>potential east-west pedestrian and cycle<br>route.  |
| PM9 | 59-63                | Paragraphs 153, 155, 165, 168 and others which show the abbreviation "NA".  |
|     |                      | Modify as follows:  |
|     |                      | Delete "NA" and substitute <b>Town Centre</b> .   |
|     |                      | Expand Footnote 28 on Page 59: <b>The Retford Town Centre Housing Needs</b>   |

|        |   | Assessment (HNA)by AECOM, October 2022 See HNA at   |
|--------|---|---|
|        |   | Paragraph 171   |
|        |   | Line 4 should read:homes built to wheelchair user standards <del>M34(3)</del> <b>M4(3)</b> .  |
| PM10   | Pages 64&65   | Policy 10a Housing Mix  |
|        |   | Modify as follows:  |
|        |   | 1. As appropriate to their scale, nature and location, <i>major</i> housing <i>development</i> schemesup to date Housing Needs Assessment which is;           |
|        | <ul> <li>50% of dwellings</li> <li>15% 4 or more bed</li> </ul>   |   |
|        |   | unless it can be demonstrated   |
|        |   | Add a new footnote to Policy 10a to state that major development is as defined in the NPPF – 10 or more homes or a site of 0.5 hectares or more.              |
|        |   | Policy 10b Housing Tenure   |
|        |   | Modify as follows:  |
|        |   | There is a local housing needhomes to rent. <b>Subject to viability and feasibility</b> , Where appropriate, <b>and</b> in addition to providing First Homes, |
|        | Policy 10c Accommodation for Older People   |   |
|        |   | Modify as follows:  |
|        |   | Proposals for Plan Area, given its topography and the proximity of everyday services.   |
| PM11   |   | Paragraph 179   |
| and 66 | Modify as follows:  |   |
|        | Last sentence: This is a requirement in <b>Policy</b> ST50 of the <b>emerging</b> Bassetlaw <b>Local</b> Plan <b>which</b> requires |   |

| PM12 | Page 82                       | Paragraph 239  |
|------|-------------------------------|--|
|      |                               | Delete the final word in the paragraph:<br>Council   |
| PM13 | Throughout<br>the<br>document | Refer to the December 2023 version of the NPPF and update paragraph references where they have changed (see paragraph 4.38 of my report for an indication in this regard). |