

Blyth Neighbourhood Plan

Representations Submitted to the Independent Examiner (Additional Regulation 16 Consultation, January – March 2020)

Compiled March 2020

Barton Wilmore, on behalf of Heyford Developments

(Pages 1 - 95)

Neighbourhood Planning
Bassetlaw District Council
Queen's Buildings
Potter Street
Worksop
S80 2AH

VIA EMAIL ONLY

29883/A3/SJ/JB/

2nd March 2020

Dear Sir/Madam

REPRESENTATIONS TO THE DRAFT BLYTH NEIGHBOURHOOD PLAN (JANUARY 2020 CONSULTATION)

We write on behalf of our Client, Heyford Developments Ltd and welcome the opportunity to respond to the consultation on the additional information for the draft Blyth Neighbourhood Plan ('the draft Neighbourhood Plan'). We respond in respect of our Client's land interests at Park Farm, Blyth ('the site'), referred to in the draft Neighbourhood Plan supporting documents as reference NP08. We have previously responded to the Regulation 14 consultation in April 2019 and Regulation 16 in October 2019. The latter response was supported by a Vision Document. Following comments from Bassetlaw District Council (BDC) Conservation Officers, we have considered the heritage and landscape matters further and amended the Concept Masterplan accordingly. This is appended to these representations alongside a landscape technical note and heritage appraisal, which have informed the revisions and should assist in demonstrating how these concerns have been overcome.

It is noted that this is a focused, additional Regulation 16 consultation to provide an opportunity for interested parties to comment on updated documents. The documents, and the reason for consulting on them, are as follows:

- SEA/HRA Screening Report: new document, previously omitted from the submission
- Basic Conditions Statement: minor amendments to reference the SEA/HRA Report
- Site Assessment Report: correction of errors in the performance tables for site NP07 and NP08
- Consultation Statement: new supplement to the previous Consultation Statement

With regards to the updated Site Assessment Report, it is noted that the comments in relation to the site (NP08) have been amended to reflect that it does not form part of the Serbly Unregistered Park and Garden. This amendment is supported.

Whilst not the subject of this consultation, we note the Parish Council's response to the Examiner (7th November 2019) in respect of our previous submissions to the draft Neighbourhood Plan. This clarifies that the highways assessment of the site did not identify any issues. This clarification is welcomed.

The outstanding concern with our Client's site therefore appears to be solely from a conservation perspective. The revised Concept Masterplan appended to this letter seeks to address the concerns raised through the following changes:

- The removal of development within the eastern part of the site to provide a larger buffer between the proposed development and the adjacent buildings.
- The removal of development from the western part of the site to increase the western buffer, which further protects views towards the Grade I listed St Mary & St Martin's Church and the open landscape character / public right of way leading to the former Blyth Hall.

It is our view that a detailed proposal for the site could deliver between 37 and 50 dwellings. The Concept Plan does not propose a detailed design, but it does provide an indication of how a development could come forward in a sensitive manner which responds to its context, including key considerations of heritage and landscape. This approach has been informed by technical work including landscape, heritage, masterplanning, highways and drainage. It is a deliverable proposal on a site which is available for development now.

We ask that the District Council, Neighbourhood Plan Group and Examiner consider this information alongside the matters we have raised previously in our Regulation 16 representations. Whilst we appreciate the Parish Council's response regarding the highways assessment of our site, we remain concerned that neither this formal response, nor the updated Site Assessment Report, address any of the other issues raised in our previous submission. We therefore continue to express the concerns regarding:

- The weight given to the community views in the site selection process.
- The deliverability and suitability of the Spital Road allocation (Policy 8).
- The flexibility of the draft Neighbourhood Plan and its ability to deal with changes in circumstances at a District level.

These concerns have not been addressed via the updated information. We therefore continue to object to the draft Neighbourhood Plan on the basis that it conflicts with the Basic Conditions that a Neighbourhood Plan must meet.

A consultation on the Bassetlaw Local Plan ended on 26th February 2020. We responded to this consultation with a number of concerns with the proposed spatial strategy, including the arbitrary 20% cap applied to Small and Rural Settlements. Whilst we appreciate the issues of timing with the draft Neighbourhood Plan coming ahead of the draft Local Plan, we would strongly recommend that sufficient flexibility is built into the draft Neighbourhood Plan to avoid it becoming out of date early within the plan period. As we have previously noted, a review policy can help to achieve this, but we would recommend compliance with the NPPF and the basic conditions would best be achieved by ensuring the proposed housing allocations are deliverable and sustainable.

Our representations to the draft Local Plan consultation are appended to this response for information.

Conclusion

We trust these representations are helpful to inform the Examination of the Neighbourhood Plan. Should you require any clarifications of the points raised please contact me or Mark Sitch.

Yours sincerely

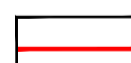






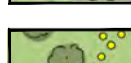

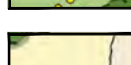
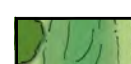
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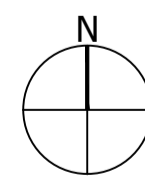
JAMES BONNER
Associate Planner

Enc.



LEGEND

- | | | | |
|---|--|---|------------------------------------|
|  | Site boundary |  | Existing tree/hedgerow planting |
|  | Proposed vehicular access point |  | Proposed tree planting |
|  | Existing footpath/Public Right of Way (PROW) |  | Play Area/Equipment |
|  | Residential |  | Proposed informal pedestrian route |
|  | Public open space |  | Shared surface |
|  | Attenuation/Swale | | |



Project
Park Farm, Blyth

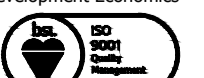
Drawing Title
Revised Concept Masterplan

Date 15.05.19	Scale 1:1000 @ A2	Drawn by GSB	Check by CdB
Project No 29883	Drawing No 9300	Revision -	

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Park Farm, Blyth, Nottinghamshire – Blyth Neighbourhood Plan reference NP08

Landscape and Visual Appraisal: Landscape Response to Site allocation Assessment Report for Blyth Neighbourhood Plan (Updated December 2019)

2nd March 2020

Key views and approach to Blyth from Worksop Road:

Policy 12 of the Draft Blyth Neighbourhood Plan 2018-2035 identifies important views including View F: Village Entrance from Worksop Road, which is relevant to the site. The policy states that:

“... 2. Development proposals will be supported provided that they demonstrate to have taken account Local Views and Vistas and have demonstrated how they are maintaining and responding positively to such views in terms of landscaping solutions, boundary treatment, layout, massing.

3. Development proposals that may cause harm to the Key Local Views and Vistas will need to demonstrate how the benefits of the development outweigh the harm: in such circumstances the harm should be minimized and mitigated.”

The location of View F as illustrated within Figure 13 of the Blyth Neighbourhood Plan is not publicly accessible being in a field and therefore the view has been analysed as seen from Worksop Road and made reference to within this statement as View F.

The approach to Blyth, northwards along the Worksop Road is through the open fields of the countryside. The first visible elements of the village that can be seen on this approach are the late 20th century houses off Briber Road and Spitalfields Road. Mature trees form the view to the west of Worksop Road. The remainder of the village including the site and the Grade I listed St Mary & St Martin’s Church are concealed by mature tree cover.

Moving further north along Worksop Road, the elements of the view remains similar to View F, till approximately 50m from Briber Road, when there is a glimpsed view of the church tower. A part of the site is also visible from this location. The church tower becomes more evident as the approach gets closer to the southern edge of Blyth, although seen through the gaps in the vegetation.

The view changes as we proceed further north, the landform dips very gently and the view of the church disappears past the junction of Briber Road and Worksop Road. The housing along Worksop Road marks the entry into Blyth. Views of the church are also afforded near the junction of Worksop Road and the High Street, however, by this point, it is no longer an approach into Blyth being situated within the village. The views of the church has been identified as the ‘cone of visibility’ within Figure 1.

Journey along Public Right of Way (PRoW) FP2:

The Site allocation Assessment Report for Blyth Neighbourhood Plan (Updated December 2019) notes that the:

“tree-lined footway to the west is part of the Blyth Hall unregistered park & garden.”

This tree-lined PRoW forms the western boundary of the site and views of the church tower are afforded from the southern part of the footpath, through the gaps in vegetation. The PRoW generally has a tunnelled view that is directed by the mature trees on either side.

Although this PRoW is referred to as part of the former Blyth Hall, there are actually very limited lines of sight and visual connections to the unregistered park and garden. It is marked by open land on either side, however, visual connections to the dwellings along Worksop Road retains its sense of place in a village.

Site Allocation Assessment Report Blyth Neighbourhood Plan November 2018 (Updated December 2019) Bassetlaw District Council Conservation comments on site NP08:

“With regard to the west part of the site, which I have labelled C, this site also contributes to the rural and open setting of the Conservation Area and those nearby Listed Buildings. In addition, the views which are currently afforded towards St Mary & St Martin’s Church are amongst the most significant and memorable of any towards that structure. Finally, the site contributes to the setting of the Blyth Hall unregistered park & garden, the tree-lined avenue being especially significant, a surviving route to the former Blyth Hall. With this in mind, Conservation would strongly object to this part of the site being allocated.”

Landscape Response:

Development on the western part of the Site has largely been restricted to ensure the retention of the open character of the area. This will be treated as a public space that will link the countryside further west to the site and the village. The development will be set back from the western boundary which will also ensure that the mature trees and public right of way leading to the former Blyth Hall will retain the character that it possesses currently.

The views to the Grade I listed St Mary & St Martin’s Church, a landmark feature in this area, have been studied and recorded. The concepts for the masterplan, have been informed by these carefully mapped lines of sight. The ‘cone of visibility’ as recorded within the Constraints and Opportunities Plan on page 22 of the Vision Document demonstrates and accepts a sympathetic and appropriate response to this key feature. Figure 2 also illustrates the area being termed as Site C in the Site Allocation Assessment Report Blyth Neighbourhood Plan (updated December 2019) and its relationship with the ‘cone of visibility’. The proposals show how development is set back and out of the ‘cone of visibility’ to the eastern side of the site. This would retain the existing views, but also create new ones from the open green space to the west which will be available for public use.

Conclusion

The Concept masterplan has been refined to be sensitive to the current assets at Blyth and provides a logical and sympathetic edge to the village that is informed by a landscape and visual appraisal. The western extent of the masterplan does not cross the existing western build line formed by Park Lodge off Sheffield Road (A634). The Concept masterplan is contained by the ‘cone of visibility’ and provides an open character to the west and would assist in connecting the southern part of Blyth to the northern part of Blyth. Our case is founded on a strong and clear evidence base that identifies that this is a sensible and logical place for the settlement to grow in a sustainable manner.



-  Site Boundary
-  Cone of Visibility
-  Viewline
-  Settlement
-  Public Right of Way
-  Blyth Conservation Area

-  Contours
-  Listed Building
-  Unregistered Parks & Garden
-  View F. Village entrance from Worksop Road
(Blyth Neighbourhood Plan 2018-35, Regulation 14 Consultation Draft Plan, January 2019, Policy 12 Map, Important Views)

PROJECT
Park Farm, Blyth

DRAWING TITLE
Figure 1: Landscape Visual Analysis

DATE	SCALE	DRAWN BY	CHECK BY

PROJECT NO	DRAWING NO	REVISION

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-  Site Boundary
-  Cone of Visibility
-  Viewline
-  Settlement
-  Public Right of Way
-  Blyth Conservation Area

-  Contours
-  Listed Building
-  Unregistered Parks & Garden

Site Allocation Assessment

-  Area A
-  Area B
-  Area C

PROJECT
Park Farm, Blyth

DRAWING TITLE
Figure 2: Landscape Visual Analysis Overlaid on Site Allocation Assessment

DATE	SCALE	DRAWN BY	CHECK BY
PROJECT NO	DRAWING NO		REVISION

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Land at Park Farm, Blyth, Nottinghamshire

Heritage Appraisal

March 2020

Land at Park Farm, Blyth, Nottinghamshire
Heritage Appraisal

Project Ref:	29883/A5/P1/JS/SO	29883/A5/P1/JS/SO	29883/A5/P1/JS/SO
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- Appendix 3: Blyth Conservation Area Summary of Special Interest
- Appendix 4: Blyth Conservation Area Selected Maps
- Appendix 5: List Descriptions

1.0 INTRODUCTION

- 1.1 This Heritage Appraisal has been prepared by Barton Willmore on behalf of Heyford Developments Limited (our client), to support representations to the allocation consultation (Jan 2020) on the Regulation 16 Submission Draft of the Blyth Neighbourhood Plan 2018-2035 ('Neighbourhood Plan'). The proposed allocation (the site) is located to the south-west of Blyth, a village and civil parish in the Bassetlaw district of the county of Nottinghamshire (East Midlands). The relevant site reference is NP08.
- 1.2 This appraisal has been prepared to advise on the deliverability of development on the site with reference to the historic environment constraints and to respond to comments received from Bassetlaw District Council (BDC) in relation to the heritage constraints as set out in the Blyth Neighbourhood Plan: Site Allocation Report (2018 (updated December 2019)). It takes into consideration a revised Concept Masterplan prepared following comments set out by BDC which has been included within Appendix 2.
- 1.3 It has been informed by a desk-top review including a review of the historic map evidence together with a site visit made on 24 February 2020. Specific reference has been made to the Site Selection Methodology set out in Historic England's guidance document 'The Historic Environment and Site Allocations in Local Plans: Historic England Advice Note 3' (2015).



Figure 1: Wider location plan

2.0 HERITAGE DECISION MAKING FRAMEWORK

Plan Making

2.1 Paragraph 185 of the National Planning Policy Framework (NPPF) (2019) requires that Local Plans should 'set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:

- a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;
- b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
- c) the desirability of new development making a positive contribution to local character and distinctiveness; and
- d) opportunities to draw on the contribution made by the historic environment to the character of a place.

2.2 In line with paragraph 185 of the NPPF, the Planning Practice Guidance (PPG) (updated 2019) advises plan-making bodies to identify specific opportunities for conservation and enhancement of heritage assets, including their setting. This could include development that will make a positive contribution to, or better reveal the significance of the heritage asset, or reflect and enhance local character and distinctiveness with particular regard given to the prevailing styles of design and use of materials in a local area (Paragraph: 003 Reference ID: 18a-003-20190723).

2.3 Historic England have produced 'The Historic Environment and Site Allocations in Local Plans: Historic England Advice Note 3' (2015) which sets out advice on evidence gathering, site selection and allocation policies to ensure heritage considerations are integrated into the site selection methodology.

Development Management

2.4 The current development management decision-making framework is set out below for reference.

Legislation

Planning (Listed Building and Conservation Areas) Act 1990

- 2.5 Listed Buildings and Conservation Areas are afforded statutory protection through the Act. Section 66 requires local planning authorities to have special regard to the desirability of preserving the significance of listed buildings, as well as any contribution made by their setting. Section 72 requires that local planning authorities must pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.

Local Plan Policy

Bassetlaw Core Strategy and Development Management DPD (adopted December 2011)

- 2.6 Strategic Objective SO9 sets out the council's vision to establish a high quality of life for all of its residents. To achieve this SO9 sets out the Council's strategy:

"To protect and enhance Bassetlaw's heritage assets, identify those of local significance, advance characterisation and understanding of heritage asset significance, reduce the number of heritage assets at risk and ensure that development is managed in a way that sustains or enhances the significance of heritage assets and their setting."

- 2.7 Development Management Policy DM8 (The Historic Environment) gives a presumption against development that will be detrimental to the significance of a heritage asset. Policy advice is also given on considering proposals that affect the setting of heritage assets, including scale, design, materials, siting and views to and from the heritage asset affected. In addition, proposals are expected to be in line with conservation area appraisals.

3.0 IDENTIFIED HERITAGE CONSTRAINTS

- 3.1 Step 1 of the Site Selection Methodology set out in Historic England’s Advice Note 3 ‘The Historic Environment and Site Allocations in Local Plans’ seeks to identify which heritage assets are affected by the potential site allocation. These have been identified below following a desk-top study and fieldwork.
- 3.2 Following submission of our October 2019 representations to the Regulation 16 Submission Draft Blyth Neighbourhood Plan 2018-2035, comments were received from Officers at Bassetlaw District Council which identified the following heritage assets for consideration in relation to the site:
- a. Blyth Conservation Area
 - b. Park Farm - Grade II listed Building
 - c. Parish Room - Grade II listed building
 - d. St Johns (former Blyth School) – Grade II listed building and scheduled monument
 - e. St Mary and St Martins - Grade I listed building
 - f. Blyth Hall Unregistered Park and Garden (UPG)
- 3.3 This has been further reviewed by a site visit and desk-top review to identify the potential for sites to affect heritage assets. No additional sites were identified.

Statement of Significance

Blyth Conservation Area

- 3.4 Blyth Conservation area covers an area of approximately 0.28 square kilometres, incorporating the historic core including the medieval church, the village green, the former park to Blyth Hall and further historic buildings and sites. The conservation area was first designated in 1978 and extended in 2012. A conservation area appraisal (CAA) was adopted by Bassetlaw District Council (BDC) planning committee in 2012. Blyth CAA includes a detailed character appraisal which sets out the summary of special interest which have been reproduced in Appendix 3. These include:
- a. Character appraisal Layout and plan form
 - b. Architecture: buildings and materials
 - c. Public realm, amenity spaces, landscaping and boundary treatments
 - d. Key views and vistas

- 3.5 Historically the settlement developed around two important regional routes (A634 Sheffield Road/Retford Road (west to east) and the B6045 Bawtry Road/High Street/Spital Road (north to south)). Archaeological evidence suggests there has been settlement around Blyth from the Roman period onwards. Historic buildings survive from the Norman Conquest onwards, most significantly the Grade I listed church of St Mary and St Martin, which was formerly part of a Benedictine Priory. Most buildings date from the 18th and 19th centuries and in total there are 29 listed buildings which are primarily located on the main thoroughfares. The historic development of the settlement is still legible in its layout where buildings are often set within earlier land boundaries, known as burgage plots. The CAA notes how these are particularly prevalent along the High Street.
- 3.6 In addition, the CAA includes a series of maps illustrating key characteristics which contribute to the special interest. Relevant to this heritage appraisal are Map 48: Blyth – landscape features and Map 49: Blyth – Key views. These have been reproduced in Appendix 4.

Setting

- 3.7 The CAA description of the setting notes how the settlement is located within a landscape of rolling landforms containing predominantly arable uses and a mixture of narrow river valleys, large areas of woodland and 18th century landscape parks, of which Blyth Park is a good example. The natural topography is described as affording impressive views of the settlement, especially of St Mary and St Martin’s Church when approached from the south.
- 3.8 The CAA sets out significant landscape features and relevant to the proposed allocation site is the avenue of trees on the west of the site, which are recorded as having a Tree Preservation Order and some trees on Worksop Road are recorded as ‘Other significant trees’ (see Appendix 4). These tree lined boundaries are considered to contribute to the special interest of the conservation area.
- 3.9 Key views are identified within Map 49 (see Appendix 4) of the adopted CAA. This includes key views towards the conservation area from the surrounding area and from the conservation area facing outwards. The following views have been identified as being relevant to the proposed allocation site:
- a. Views both into and out of the conservation area on the avenue of trees located to the west of the allocation site between Sheffield Road and Worksop road; and

- b. Views from Worksop Road north, across the proposed allocation site towards the historic core of Blyth and St Mary and St Martin's Church.

3.10 A site visit confirmed that in relation to other key views within the adopted CAA; the site is either screened by intervening topography, built form and vegetation, or the views are not directed towards the proposed allocation site.

3.11 The landscape features and key views identified within the CAA that are relevant to the site are to be considered to contribute to the special interest of the conservation area.

Park Farm House, Grade II Listed Building

3.12 Park Farm House is a Grade II listed building and as such is considered to be of special architectural and historic interest. The building was originally listed in 1966 and the list entry most recently amended in 1984. A copy of the list entry is provided in Appendix 5.

3.13 The list entry describes the building as a house dating to the 17th century that was altered in the 18th century. The building is characteristic of 18th century polite architecture and retains many original features including the symmetrical elevation, stucco quoins and string course, central doorway with bolection moulded doorway surmounted by a segmental pediment. The building shows multiple phases of later alteration including enlarged windows, addition of a bay window, rear extension and concrete pantile roof.

3.14 The heritage significance of the building is derived from its architectural interest as a 17th century dwelling that was remodelled in the 18th century to conform to the dominant classical style of polite architecture. The building is also of historic interest associated with its rarity as a building with remnants of surviving fabric dating from the 17th century onwards.

Setting

3.15 The immediate setting of Park Farm is its location within the High Street which largely retains buildings along historic layouts with linear development orientated towards the village green. This form of development focused on the high street with outbuildings at the back. The property sits within large plot that runs perpendicular to the High Street. This is enclosed by neighbouring properties and a mature tree lined boundary to the rear.

3.16 The proposed allocation site comprises open land to the rear of Park Farm. Historic maps suggest that this land was historically open agricultural land. Maps dating from the

18th century onward show Park Farm located within its own narrow plot. From the map evidence, the allocation site appears to have historically been part of the wider Blyth Hall Estate. With the exception of the eastern portion, the wider allocation site does have any historic functional or associative relationship with Park Farm.

- 3.17 The proposed allocation site maintains an open setting to the rear of the property that is reinforces the historically linear pattern of development found on the High Street. For that reason, it should be considered to make some contribution to the historic interest of Park Farm.



Figure 2: Park Farm



Figure 3: Park Farm

St Johns (Former Blyth School), Grade II listed building and Scheduled Monument

- 3.18 St Johns is a Grade II listed building and as such is considered to be of special architectural and historic interest. The building also forms part of a Scheduled Monument. The building was first listed in 1952 and the entry most recently amended in 1984. Details of the scheduling designation are not available online.¹ A copy of the list entry is provided in Appendix 5.
- 3.19 The building is recorded as being a hospital of St John the Evangelist, re-founded in 1226. The list entry describes the building as being rebuilt in 1446 incorporating older material. The building later became the village school in the 17th century.
- 3.20 The building has considerable historic interest as the oldest building in Blyth aside from the church as well as its ecclesiastical foundation and its use as a hospital and later school. The survival of the building from the medieval period also has significant archaeological interest, as represented by the site's designation as a Scheduled

¹ <https://historicengland.org.uk/listing/the-list/list-entry/1006402>, consulted 26 February 2020

Monument. Furthermore, the building has architectural interest with surviving 13th elements and later modifications.

Setting

- 3.21 The building is located to the south of the village, located on the village green. It is located on a natural rise and is prominent within the streetscape when approached on the High Street from north and south. It predates the surrounding development on the High Street and Little Lane and its prominent location, separate from later development, contributes to the historic interest of the building. Its visibility and elevated position on a main thoroughfare also contribute to the historic interest of the building as a former ecclesiastic and school building.
- 3.22 The proposed allocation site is located on Worksop Road, to the rear of High Street. Due to the natural topography and intervening buildings the site is not visible in views of St Johns when approaching along the High Street. Any view from St Johns towards the site will be partial and form part of a view already characterised by built form on the High Street and Worksop Road. It is not known if the site has any functional or associative relationship with St Johns, however, as rural land the site is considered unlikely to have any associative value with the buildings special interest. The site is not considered to contribute to the significance of the heritage assets or their setting.



Figure 4: St Johns

St Mary and St Martin's Church, Grade I Listed Building

- 3.23 The priory church of St Mary and St Martin is a Grade I listed building and as such is considered of exceptional architectural and historic interest. The building was designated in 1966 and the list entry (see Appendix 5) includes a detailed architectural description of the building.
- 3.24 In summary, the church was founded in the 11th century as part of a Benedictine Priory and the church contains some of the earliest Norman architecture in Nottinghamshire. Following the dissolution in 1536 the church was substantially reduced in size, including the removal of a second tower and the priory buildings. The associated Priory remains form part of a Scheduled Monument, covering an area to the north and east of the church. The church has several significant phases of construction dating from the late-11th, early-13th, 14th, 15th and late-15th, 16th and 17th centuries with restorations recorded in the late-19th and 20th centuries. In addition, there are monuments from the 13th century onwards and a rare survival of a 15th century 'doom' painting, added at the time of the dissolution. As a surviving Priory Church with significant survival of architectural features, monuments and painting from the 13th century onwards the church has significant historic,

architectural, artistic and archaeological interest. This is reflected in its designation at the highest grade.

Setting

- 3.25 In relation to the proposed allocation site, perhaps the most important element of the church's setting is its visibility within the wider landscape. The western tower is the most prominent structure in Blyth, being visible for miles in all directions. The tower is distinctive Roche Abbey Stone, with angle buttresses, embattlements and large four arched bell-chamber openings. The church tower was designed intentionally to be visible from surrounding views and is experienced as a prominent landmark in the landscape. Views of the tower make a significant contribution to the historic and architectural interest of the building.
- 3.26 Views of towards the church tower have been identified within the Blyth CAA form Worksop Road, across the site towards Blyth (see Figure 5). As a Key View this should be considered to make a significant contribution to the special interest of the listed building.



Figure 5: Priory Church of St Mary and St Martin



Figure 6: View from Worksop Road across the proposed allocation site with view of the Priory Church of St Mary and St Martin visible in distance.

Parish Room, Grade II Listed Building

- 3.27 Parish Room is a Grade II listed building and as such is considered to be of special architectural and historic interest. The building was listed in 1984. A copy of the list entry is provided in Appendix 5.
- 3.28 The list description describes the building as a former toll cottage. The building is now a dentist surgery; however, the Conservation Area Appraisal provides evidence to suggest the building was a former school and the building is labelled as a school on historic OS maps. The CAA notes how the building was constructed as a Girl's School in 1842 and stylistically comparable to other mid-19th century schools in the local area (CAA, p.60). The building has architectural and historical interest as an example of a rural mid-19th century school building elaborated with gothic detailing, such as mullion windows and hood moulds.

Setting

- 3.29 The front elevation faces onto the High Street and the village green and it occupies a location at the junction of Worksop Road. St Johns, another former school building, is located to the south-west. The visible association between the two buildings adds some degree of historical interest to their former function.
- 3.30 The proposed allocation site comprises open land to the rear of Parish Room. Historic maps suggest that this land was historically open rural land. There are intervening agricultural buildings separating the Parish Room from the allocation site. There is no evidence to suggest any former land ownership or historical association between the site and the building. As such the site is not considered to make any appreciable contribution to the heritage interest of the listed building.



Figure 7: Parish Room



Figure 8: Parish Room

Blyth Hall Unregistered Park and Garden (UPG)

- 3.31 The UPG covers an area of former landscaped park associated with Blyth Hall (demolished 1973). The land was formerly part of Blyth Priory but following the dissolution in 1536, it became part of a private residence. The landscaped park primarily dates to the 17th and 18th centuries with 19th century alterations. The majority of the surviving elements date from the 18th century and is located north of Sheffield Road. However, the local listing entry includes the tree-lined avenue between Sheffield Road and Worksop Road as one of the features significant to the UPG.
- 3.32 The significance of Blyth Hall UPG is derived from its historical and architectural interest as the site of a designed landscape with surviving features that remain discernible in the landscape and its association with Blyth Hall. The landscape is also likely to have some archaeological interest associated with the buried remains of former landscape features.

Setting

- 3.33 The park and garden is focused on the site of the former Blyth Hall and St Mary and St Martin's Church within the historic core of Blyth. The River Ryton, which was damned, forms an important landscape feature within the park, including canals and two bridges.
- 3.34 The proposed allocation site is located outside of the boundary of the UPG east of the tree-lined avenue between Sheffield Road and Worksop Road. The site is an area of open space that provides a green buffer between the park and the western extent of development along the High Street. The southern extent of the park is located some distance from the main designed landscape historically associated with Blyth Hall and the tree-lined avenue provides a strong landscape boundary to the park. The allocation site, by virtue of its proximity and open character is considered to make some contribution to the setting of this UPG.



Figure 9: Tree-lined avenue west of proposed development site

4.0 ANALYSIS: PRINCIPLE OF DEVELOPMENT

4.1 Step 3 of the Site Selection Methodology is to identify what impact development on the proposed allocation might have on the significance of any heritage assets. This section sets out a review of the potential heritage impacts that may result from such development, taking into consideration concerns raised by BDC in relation to the proposed site allocation.

4.2 This section is set out to address the three parcels (Sites A, B and C) within the proposed allocation site, in keeping with the site assessment. A review of the potential heritage impacts of each site is set out below.

Site A

4.3 Site A covers a central parcel of land within the proposed allocation site. It covers an area containing large mid to late-20th century agricultural buildings that are not considered to hold any heritage interest.

4.4 BDC state that *'there are no concerns with the principle of development on this part of the site, subject to an acceptable design, scale, layout, material and boundary treatments.*

4.5 Section 3 of this report demonstrates that Site A makes no contribution to the heritage significance of any of the heritage assets assessed above. Therefore, subject to design, scale, layout and materials, the identified heritage assets should not preclude development within this part of the site.

Site B

4.6 Site B covers the eastern extent of the proposed development area, located adjacent to the boundary of the conservation area and two Grade II listed buildings: Park Farm House and Parish Room. The area has historically been rural in character and was split into two paddocks at the time of a site visit (25.02.20). There is an access gate from the site onto Worksop Road at the east of Site A and the existing boundaries are characterised by hedgerows and mature trees.

4.7 BDC conservation objected to development on Site B commenting:

“This forms an important part of the open character of this part of the Conservation Area and the siting of those nearby Listed Buildings. In addition, key views are afforded towards the grade I listed Church of St Mary & St Martin.”²

- 4.8 These points will be address in turn below.
- 4.9 The open space in Site B is outside of the boundary of the designated conservation area and views towards this open space from within the conservation area are very limited. The built form and vegetation along the High Street screen views from most of the conservation area and the site is only partially visible in views from Worksop Road out of the conservation area.
- 4.10 The site is not visible in any of the Key Views identified on Map 49: Blyth – Key Views in the CAA. The CAA provides a detailed character analysis that places the emphasis on the importance of views facing the village green and key historic buildings such as St John’s Hospital. The CAA does not identify open spaces to the rear of properties on the High Street as having a contribution to the significance or setting of the CA. The site is not identified as one of the ‘significant open spaces’ but the boundary trees are recorded as ‘Other significant trees’ as identified on Map 48: Blyth – Landscape Features.
- 4.11 It is our assessment that the Site B is not considered to make an important contribution to the heritage interest of the conservation area or its setting. Furthermore, Site B is in an area outside of the conservation area where there is existing 20th century development on Worksop Road. As such, it is considered that a quantum of development would be achievable without impacting the heritage interest of the conservation area.
- 4.12 This report suggests that Site B rear reinforces the historic pattern of development along the High Street, however for the reasons set out in section 2, it is considered that this makes a limited contribution to the heritage interest of the Grade II listed Park Farm. It is considered that any impact to the setting of Park Farm could be mitigated through a sensitive design and landscaping in order to maintain an element of openness to the rear of the historic properties and not encroach further on their wider setting.
- 4.13 This report suggests that Site B makes no contribution to the heritage interest of the Grade II listed Parish Room. As a mid-19th century School that now operates as a dentist surgery the building construction is orientated onto the High Street and Village Green.

² BDC, Site Allocation Assessment Report, November 2018 (updated December 2019), p. 34

Moreover, it is separated from Site B by intervening buildings that also screen views towards Site A. As such, it is considered that development on Site A would have no impact on the heritage interest of the Grade II listed Parish Room.

- 4.14 There was no further associative relationship identified between Site B and the listed buildings, however, should this be identified greater weight should be afforded to the contribution the site makes to the listed building.
- 4.15 The Site Allocation Report notes an impact on key views afforded towards the grade I listed Church of St Mary & St Martin. Site B is not located within any of the key views identified within the CAA Map 49: Blyth – Key Views. The only views of the church are from a public footpath on the opposite side of Worksop Road. In this area views of the church are only glimpsed through breaks in the tree line and often filtered by intervening trees in Blyth. As such, Site B is not considered to form part of a key view of the church. Moreover, it is considered that with careful layout development should be possible whilst retaining glimpsed views of the church and potentially affording new views from within the development.
- 4.16 In summary, it is considered that the contribution that Site B makes to the setting of Blyth Conservation Area and the Grade II listed buildings by virtue of its open character is limited and certainly should not be considered a material constraint to development. It is likely that careful consideration will be required for the boundary treatment in the areas closest to the conservation area and Park Farm House and this may include some form of landscape buffer to mitigate the visibility of any development. Subject to detailed design, scale, layout and materials, the identified heritage assets should not preclude development within this part of the site.
- 4.17 It is considered that the Revised Concept Masterplan, included in Appendix 2, sets out the parameters of development that could be achieved on the site with minimal impact on the setting of Blyth Conservation Area and the Grade II listed buildings.

Site C

- 4.18 Site C is located on the west side of the proposed allocation site. The site is outside of the conservation area, however, the CAA includes Key Views across Site C that are directed towards the church of St Mary and St Martin, and to the west of Site C along the avenue of trees that lines a public footpath. This avenue of trees, although outside of the conservation area, is also included in the CAA's description of landscape character and is identified as having a tree preservation order. It is also located next to Blyth Hall

Unregistered Park and Garden. To the south is Worksop Road which is lined with detached 20th century houses and there is a modern cottage to the north.

4.19 The BDC Site Allocation Assessment objected to development on Site C commenting:

“...this site also contributes to the rural and open setting of the Conservation Area and those nearby Listed Buildings. In addition, the views which are currently afforded towards St Mary & St Martin’s Church are amongst the most significant and memorable of any towards that structure. Finally, the site contributes to the setting of the Blyth Hall unregistered park & garden, the tree-lined avenue being especially significant, a surviving route to the former Blyth Hall.”

4.20 These points will be addressed in turn below.

4.21 The contribution of Site C to the rural and open setting of the conservation area and those nearby listed buildings is addressed similarly Site B. The CAA does not identify this area as a ‘significant open space’ within Map 48: Blyth – Landscape Features of the CAA, however, the avenue of trees have a Tree Preservation Order and some trees on Worksop Road are recorded as ‘Other significant trees.’ Due to existing vegetation, topography and the urban grain, views to the site from the conservation area and listed buildings to the east along High Street are limited, screened by vegetation and include elements of 20th century development that sits outside of the conservation area.

4.22 Mapping data suggest Site C was historically open in character, however there is no discernible functional or associative relationship between the site and the conservation area or listed buildings. In light of the above, the site is not considered to make an important contribution to the conservation area or nearby listed buildings.

4.23 The tree lined avenue forms part of the Blyth Hall Unregistered Park and Garden which borders the west side of Site C. The open character afforded by Site C is considered to contribute to the special interest of the asset. It is therefore likely that any proposal for development will need to demonstrate that it is possible to maintain the open character, this is likely to require the inclusion of a buffer of open space and high-quality landscaping to soften the development edge and integrate it into the surrounding landscape. This approach would also mitigate the impact on Key Views of the tree lined avenue identified within the Map 49 of the CAA. Through mitigation measures to maintain the open

character of the avenue of trees it is considered likely that a quantum of development can be accommodated within this part of the site.

- 4.24 An important consideration to any development in this area will be the impact on key views of the Grade I listed St Mary and St Martin's Church. Views of the church from the surrounding landscape are considered to contribute to the heritage interest of the church and by extension the conservation area. In relation to Site C, visibility of the church is restricted to a viewing corridor along the western boundary, identified within the adopted CAA. In order for development of any form to be considered acceptable, it will be necessary to demonstrate this view can be preserved and incorporated within any proposals. This will ensure that any proposals can be considered to preserve the wider setting of the listed building.
- 4.25 In summary, it is considered that a view corridor will need to be preserved on the west of Site C in order to ensure that views towards the Grade I St Mary and St Martin's Church are maintained. This in turn will provide a buffer of open space bordering the avenue of trees that form part of Blyth Hall UPG. Subject to detailed design and landscaping, it is considered that development of within Site C can be accommodated on the eastern portion of the site without resulting in harm to the setting of the identified heritage assets.
- 4.26 The Revised Concept Masterplan, included in Appendix 2, sets out a layout that preserves the sight lines of the Church of St Mary and St Martin and would provide an open buffer of green space to mitigate the impact to Blyth Hall UPG and the conservation area. It is considered that this demonstrates a way in which Site C can be developed successfully with minimal impact on the identified heritage assets.

5.0 CONCLUSIONS

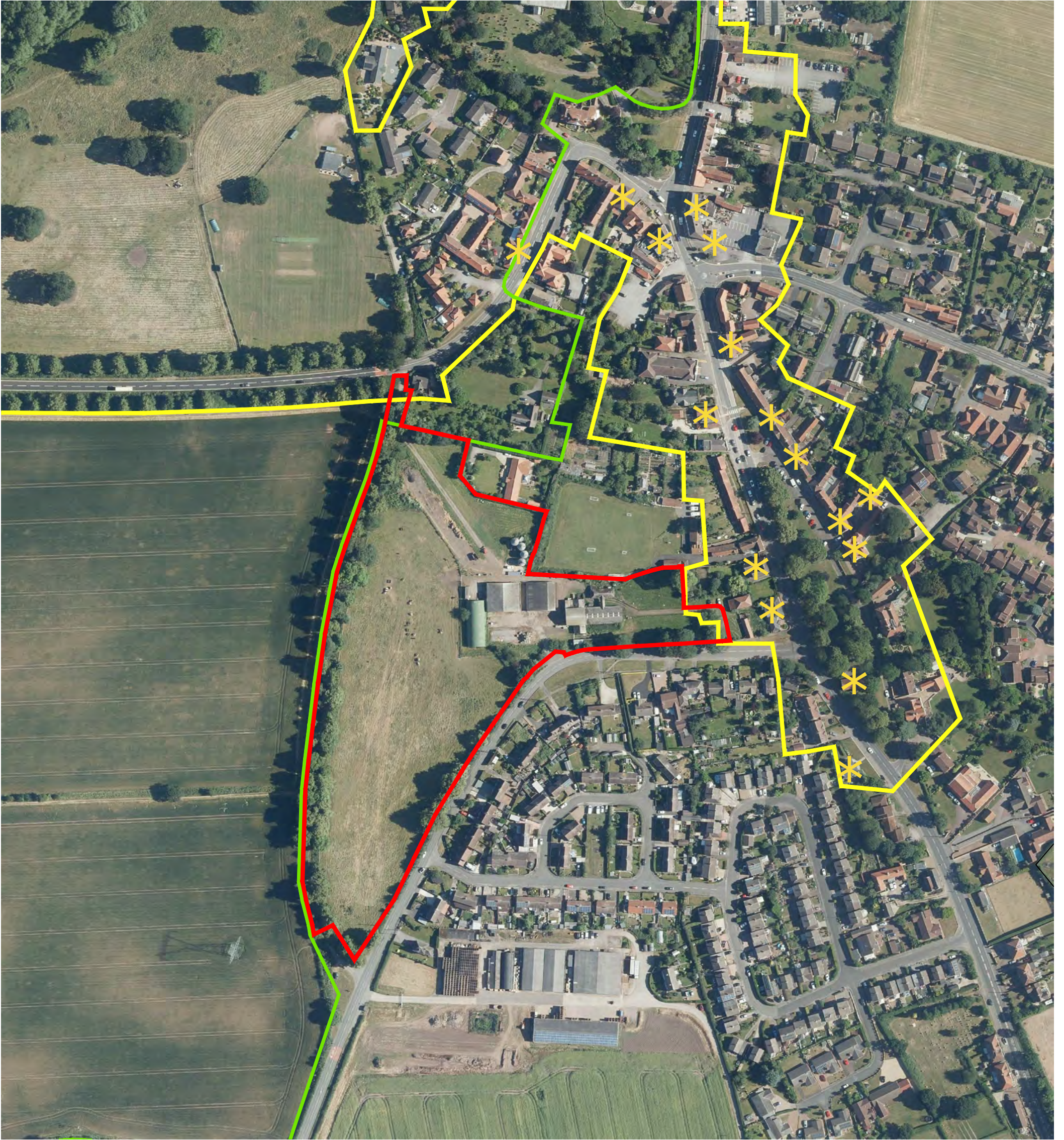
- 5.1 This heritage appraisal has been prepared to advise on the potential to deliver development on the proposed allocation site with reference to historic environment constraints.
- 5.2 The proposed allocation site was split into three parcels in the Blyth Neighbourhood Plan: Site Allocation Report: Sites A, B and C (Site Reference: NP08).
- 5.3 Site A covers an area containing large mid to late-20th century agricultural buildings. The principle of development in Site A is unlikely to result in an objection associated with the heritage assets identified in this report. This is in accordance with the conclusion of conservation comments in the Blyth Neighbourhood Plan: Site Allocation Report which concluded "*there are no concerns with the principle of development on this part of the site*".
- 5.4 Site B covers the eastern extent of the proposed allocation site. The open character of this area is considered to contribute to the special interest of the Grade II listed Park Farm House, moreover, the proximity to Blyth Conservation Area is likely to be a consideration in any proposed development. As such any proposed development will need give careful consideration to the boundary treatment, design, layout, scale and materials in order to mitigate potential impacts to the identified assets.
- 5.5 Site B also affords views of the Grade I listed Church of St Mary and St Martin, however these are limited and only glimpsed through the existing tree line. Views across Site B are not considered to make a significant contribution to the special interest of the Grade I listed church, or how it is experienced in the wider landscape. However, there are opportunities in this part of the site to enhance views towards the church which would allow its prominence in the village to continue to be appreciated.
- 5.6 The heritage constraints identified in this report are not considered to preclude development on Site B. Any proposal for development will need to consider the boundary treatment, design, layout, scale and materials in order to mitigate potential impacts to the setting of the nearby assets.
- 5.7 Site C covers the western extent of the proposed development area. This report identified heritage constraints associated with a key view of the Grade I listed Church of St Mary and St Martin, identified in the CAA, as well as the sites contribution to the setting of





Blyth Hall UPG, which also includes key views identified in the CAA. It is considered that development that impacts this view corridor has the potential to cause harm to the Grade I listed St Mary and St Martin's Church. There is an opportunity to provide an open space across the western side of Site C in order to maintain these views and furthermore, preserve the open character and views within Blyth Hall UPG.

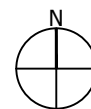
- 5.8 Subject to the recommendations set out above, any potential impact on heritage assets is considered limited and should not present a constraint which would prevent the proposed allocation of the site. The revised concept plan (Appendix 2) demonstrates how development of the proposed allocation site can be achieved whilst mitigating potential impacts to heritage assets. Detailed design considerations relating to issues such as key views, can be incorporated into any associated policy requirement for the proposed allocation.

APPENDIX 1

Heritage Constraints Plan



-  Site Boundary
-  Conservation area boundary
-  Unregistered Park & Garden boundary
-  Listed Building



Project
Park Farm, Blyth

Drawing Title
Heritage Constraints Plan

Date	Scale	Drawn by	Check by
28.02.20	1:2500 @ A3	KT	CDB
Project No	Drawing No	Revision	
29883	9103	-	

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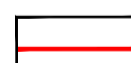




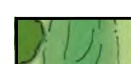



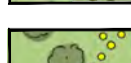
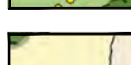
Offices at Birmingham Bristol Cambridge Cardiff Ebbsfleet Edinburgh
 Glasgow Leeds London Manchester Newcastle Nottingham Reading Southampton

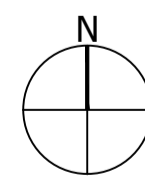
APPENDIX 2

Revised Concept Masterplan



LEGEND

-  Site boundary
-  Proposed vehicular access point
-  Existing footpath/Public Right of Way (PROW)
-  Residential
-  Public open space
-  Attenuation/Swale
-  Existing tree/hedgerow planting
-  Proposed tree planting
-  Play Area/Equipment
-  Proposed informal pedestrian route
-  Shared surface



Project
Park Farm, Blyth

Drawing Title
Revised Concept Masterplan

Date 15.05.19	Scale 1:1000 @ A2	Drawn by GSB	Check by CdB
Project No 29883	Drawing No 9300	Revision -	

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APPENDIX 3

Blyth Conservation Area Summary of Special Interest

BL1 Blyth Conservation Area – Character appraisal Layout and plan form – Summary of special interest:

- With the exception of the Parish Church of St Mary & St Martin, the established layout is of narrow plots, both long and short, orientated perpendicular to the road, with main buildings sited close the highway.
- The majority of outbuildings are sited to the rear of the main buildings, usually following the historic plot layout.
- Outbuildings are subservient to the main buildings, both in their scale and original function.

BL2 Blyth Conservation Area – Character appraisal

Architecture: buildings and materials – Summary of special interest:

- Along with its listed buildings, the Blyth Conservation Area contains numerous unlisted buildings and structures that contribute positively to the special interest of the Conservation Area. These are regarded as 'positive buildings'. Outside of the Conservation Area boundary, a range of unlisted buildings have been identified as 'non-designated heritage assets', where they conform to the Council's adopted criteria. All these buildings are marked out on map 31.
- Buildings are generally two, three or four storeys and are mostly rectangular plan forms with steep roof pitches (over 35). The rooflines are characterised by brick chimneys (with brick/stone detailing).
- Blyth has a number of timber-framed buildings dating to the 16th and 17th centuries. The majority of these are constructed on top of a stone plinth and were refronted with red brick/stucco in the 18th century. Banding at first floor level also indicates the position of the upper floor joists.
- Facing materials for buildings are predominantly red brick (usually Flemish or English garden wall bonds) or Magnesian Limestone, with brick and stone detailing common. A painted stucco finish can also be found, particularly in association with timber-framed buildings from the late-16th/17th century.
- Roof materials are primarily non-interlocking clay pantiles, with natural slates used on 19th century buildings and rosemary tiles used on early 20th century buildings.
- Period architectural features such as window arches/cills, door surrounds, hood moulds, brick string courses, timber joinery, brick chimney stacks with clay pots, saw tooth/dentil coursing, stone/timber cornices and timber shopfronts all form an essential part of the special interest of the Conservation Area.
- Street elevations are well fenestrated and often retain historic timber/metal-framed windows and timber doors.
- Given its scale, historic associations and architectural and historic interest, the Priory Church of St Mary & St Martin (and its wider setting) deserves special consideration when affected by planning proposals.

BL3 Blyth Conservation Area – Character appraisal

Public realm, amenity spaces, landscaping and boundary treatments – Summary of special interest:

- The character area contains a variety of significant landscape/public realm features including boundary treatments, verges, open spaces, trees, monuments and gateways (as indicated on map 48).
- Open spaces - Of special note are the open spaces along High Street, Bawtry Road/Sheffield Road (probably the original market place), the Churchyard and Blyth Park. The relationship between Blyth's historic buildings and the open spaces provide a character unique to Blyth Conservation Area
- Trees – Within the Conservation Area, the most significant trees are along High Street, around the church and within the former Blyth Hall estate and park.

- Walls and railings – Red brick (usually English garden wall bond) and Limestone walls contribute greatly to the character of the Conservation Area and to the setting of its most significant buildings and sites. Those around the church and off Bawtry Road are amongst the most notable. A mixture of coping styles exist, with limestone and brick/clay copings the most common.
- The walls of the Blyth Hall estate's two former kitchen gardens, located off Sheffield Road, are also significant. These are approximately 4 metres and 3 metres high respectively and built from red brick (primarily English garden wall bond) with limestone copings. Later repairs often add to the special interest.
- Monuments – Blyth churchyard contains a large number of monuments of considerable artistic and historic significance, including the grade II listed memorial to Joseph Dymond.
- Gateways – Blyth Conservation Area contains several gateways of significance, including the entrance into the churchyard and the former entrance into Blyth Hall (off Sheffield Road), both grade II listed.
- Former Blyth Hall estate – A number of important features remain from the former Blyth Hall estate, including the entrance off Sheffield Road, the walls of the former kitchen gardens, the walls adjacent to Bawtry Road, the Ice House at Centry Garth, the bridges off Sheffield Road and Bawtry Road and a wide range of mature specimen trees.
- Other significant features within the Conservation Area include the c1826 Milestone on Sheffield Road, the K6-type Telephone Kiosk off Retford Road and the Type B Pillar Box on Retford Road.

BL4 Blyth Conservation Area – Character appraisal

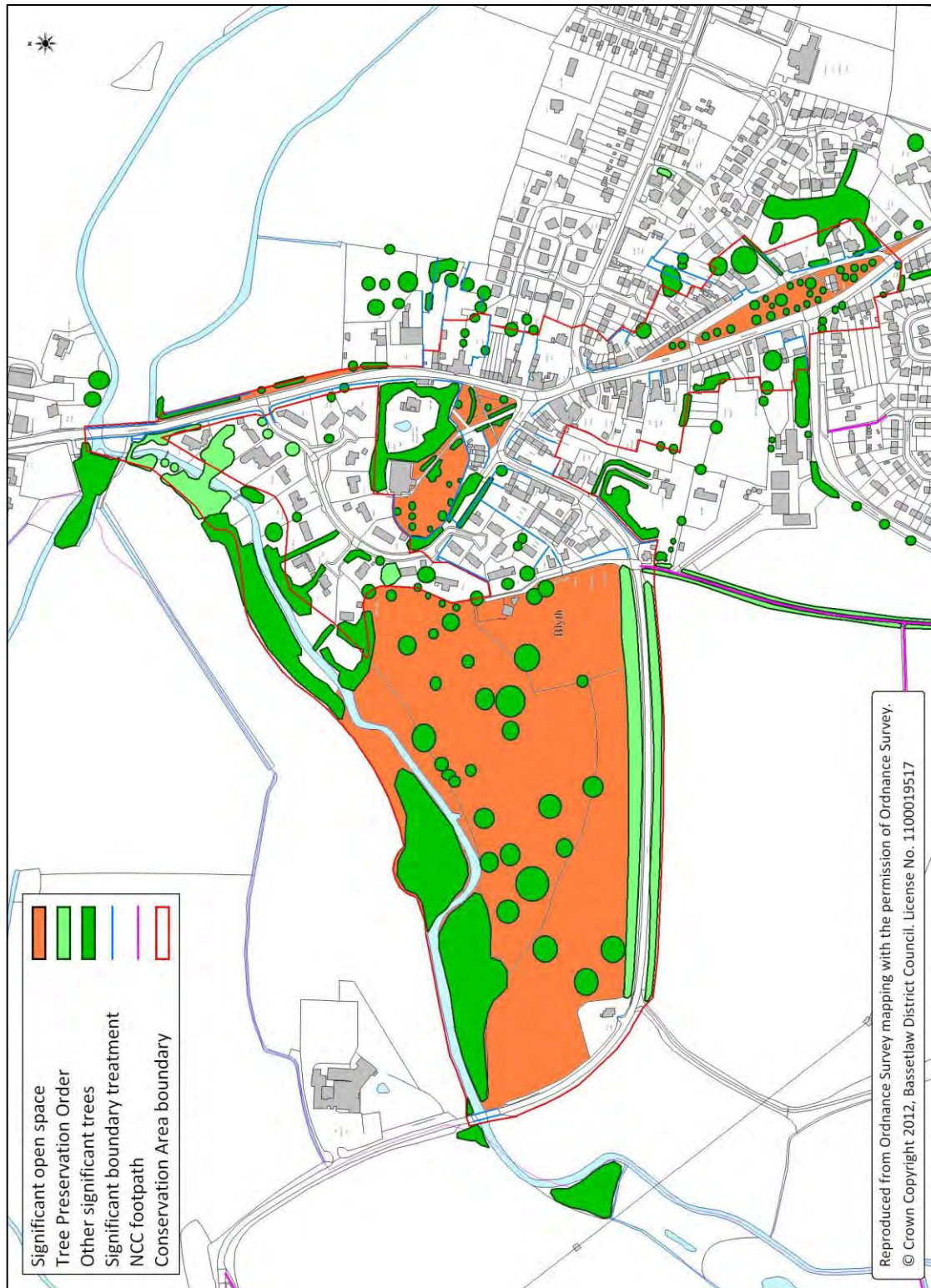
Key views and vistas – Summary of special interest:

- There are a number of important views within, into and out of the Conservation Area. The most important views are of St Mary & St Martin's Church, the tower in particular being visible along all of Blyth's historic thoroughfares and from outside of the village for a significant distance. Focal buildings/structures and indicative significant views are shown on map 49.

APPENDIX 4

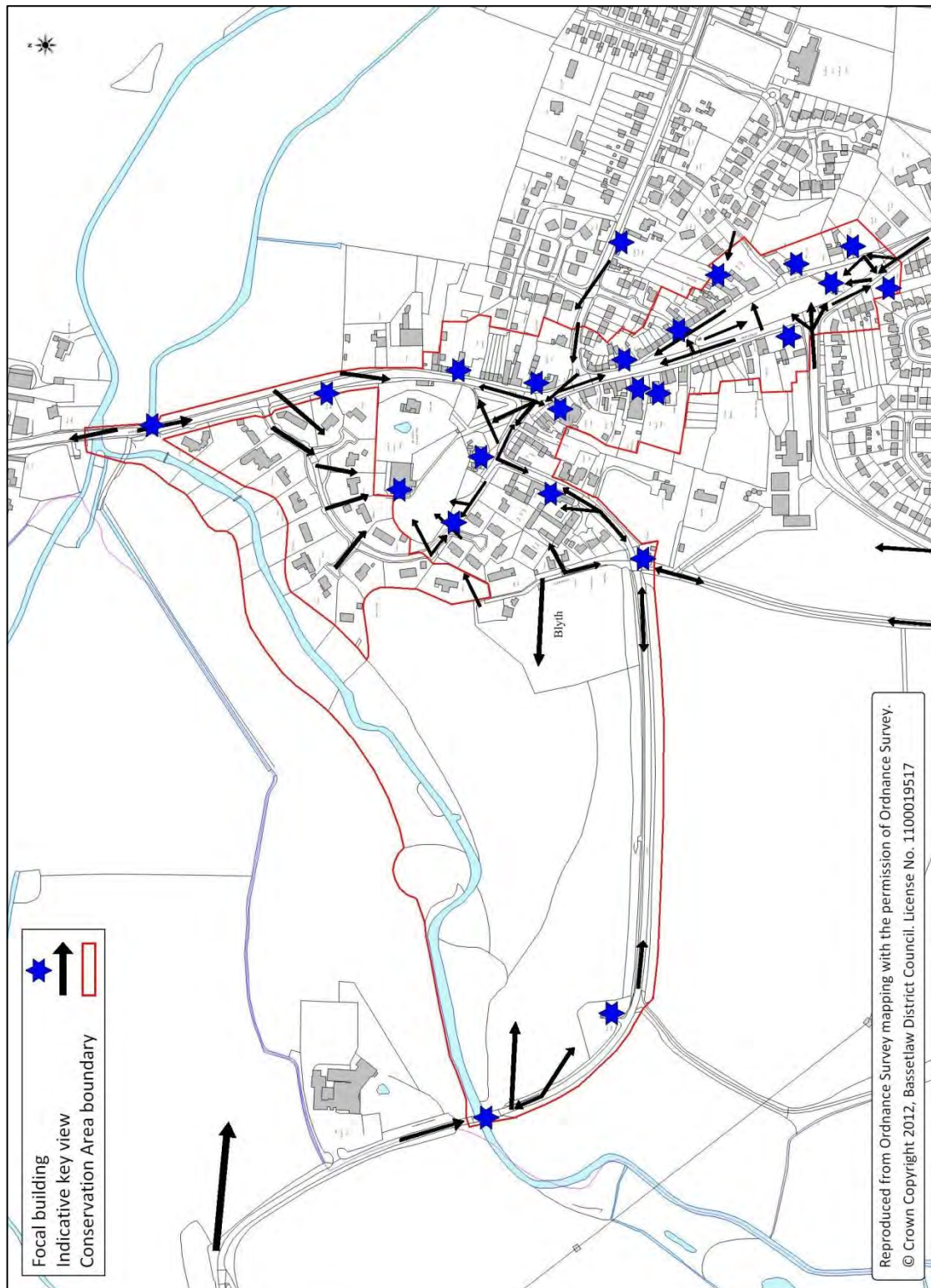
Blyth Conservation Area Selected Maps

Map 48: Blyth – landscape features



Disclaimer: The identification of significant landscapes and boundary features including walls, railings, open spaces, trees, etc (as shown on the map above) is by no means exhaustive. The absence of any feature from the above map does not necessarily mean that it is of no interest or that it makes no positive contribution to the character and appearance of the Conservation Area. Advice should always be sought from the Conservation Team at the District Council. The Tree Preservation Orders shown are also indicative only and confirmation should always be sought from the Council's Tree Officer on the precise location of the District's TPOs.

Map 49: Blyth – Key views



The key views shown on the map above are indicative only. In addition, the identification of key views is by no means exhaustive and the absence of any view from the above map does not necessarily mean that it is not significant. Advice should always be sought from the District Council's Conservation Team.

APPENDIX 5

List Descriptions

BLYTH PRIORY CHURCH OF SAINT MARY AND SAINT MARTIN

Overview

Heritage Category:
Listed Building

Grade:
I

List Entry Number:
1239182

Date first listed:
30-Nov-1966

Statutory Address:
BLYTH PRIORY CHURCH OF SAINT MARY AND SAINT MARTIN, SHEFFIELD ROAD

Map

 Ordnance survey map of BLYTH PRIORY CHURCH OF SAINT MARY AND SAINT MARTIN

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The above map is for quick reference purposes only and may not be to scale. For a copy of the full scale map, please see the attached PDF - [1239182.pdf](#)

The PDF will be generated from our live systems and may take a few minutes to download depending on how busy our servers are. We apologise for this delay.

This copy shows the entry on 25-Feb-2020 at 17:41:12.

Location

Statutory Address:

BLYTH PRIORY CHURCH OF SAINT MARY AND SAINT MARTIN, SHEFFIELD ROAD

The building or site itself may lie within the boundary of more than one authority.

County:

Nottinghamshire

District:

Bassetlaw (District Authority)

Parish:

Blyth

National Grid Reference:

SK 62403 87292

Details

SK 68 NW BLYTH SHEFFIELD ROAD (north side)

2/77 Blyth Priory Church of Saint 30.11.66 Mary and Saint Martin

G.V. I

Priory Church. Late C11, early C13 c,1300, c,1400, late C15. The transepts and 5 apses were blocked off in the C15 and demolished mid C16. Restored by Fowler 1885, further various C20 restorations, the bell chamber being restored 1929/30. Founded by Roger de Builli in 1088. Ashlar and brick with lead roofs and segmental stone coped parapet at the east end. Tower, nave, north and south aisles with tribunes and clerestories, south porch. The crossing, north and south transepts each with apsidal east chapel, the chancel ending in an apse and with straight-ended chapels have all been demolished. The angle buttressed C15 tower of 2 stages has a chamfered base with 2 moulded string courses over. There is a central arched west doorway with moulded jambs and arch, with inner order of fleuron decoration. Over is a hood mould decorated with worn crockets and rising to a crocketed pinnacle with decorated finial. Above is a slightly projecting canopy. The outer order of the jambs support single slender flat piers with set offs. These are decorated with blind tracery and topped with a crocketed pinnacle and finial which terminate at the canopy. Above is an arched 3- light window divided by a single transom and 3 mullions, with reticulated tracery below the transom and reticulated and panel tracery above. Over is a hoodmould and label stops. On either side are single niches, having ogee arches topped with a crocketed pinnacle. Rising from the springing of these arches are single small slim piers with worn decorated capitals. Above the window is a similar niche and above a single square light. There are 6 small stair lights. The 4 large arched bell chamber openings of 4 arched lights, surmounted by a further 4 arched lights and tracery have a hood mould with finial and label stops, the latter rise to single gargoyles. The top of the tower is embattled with centre and corner crocketed pinnacles. The merlons are conjoined by single open-work crocketed and cusped arches. The north aisle, west wall, on a shallow plinth with slim rectangular set back buttresses has a brick arched opening leading to a cellar doorway. Between the wall and the tower buttress is an ashlar lean-to with ashlar roof - remnants of a former spiral stair turret. The north aisle wall, with corbel table to the 3 eastern bays and traces of the cloisters, has 4 large buttresses, the western one being topped with a flue. The 2 western most bays are set on a shallow plinth and there are remnants of a sill band. The 3 bays to the west each have a single small round headed arched window in a deep recess. The 2nd bay in from the east has a single similar arched window and a small single, flat headed, window replacing an arched one. The eastern most bay has a similar flat headed window in an arched opening and a single similar arched window. There is a 2nd founder's tomb with decorated arch and a blocked arch now containing a doorway. At tribune level are 5 windows each with 3 arched lights under a flat head. In the clerestorey are 6 arched windows. Above, supporting the roof, runs a corbel table. The east wall has a central moulded arch supported on compound piers of rectangular and segmental moulding, with worn capitals. This leads to a blocked off bay of the nave with vaulted ceiling and single boss, with evidence of the once internal round piers and volute capitals. The north and south walls of this bay are blocked, to the north with brick. On either side of the arch are C20 brick refaced walls with some rendering. The south aisle wall is buttressed and set on a plinth. The parapet is embattled and has 7 gargoyles under. There is a sill band interrupted by the porch. There are 5 arched windows, each with recently restored 3-light intersecting tracery, hood moulds and label stops. To the west, between the 4th and 5th window is the c,1200 buttressed porch, with embattled, gabled parapet with 3 crocketed pinnacles and single gargoyles to its east and west walls. The central moulded arch is supported on either side by single alternating pairs of colonnettes and columns with worn and restored crocket capitals. Over the guttering, which follows the line of the gable, is a sundial. The inner arched doorway has on either side single colonnettes and single columns supporting a double order of nail head decoration. The double doors have blind tracery. To the west is an arched doorway with hoodmould over. There are 6 arched windows in the clerestorey, the eastern most one being blocked. Above, supporting the roof, runs a corbel table. The west, south aisle wall with angle buttresses and parapet has a band terminating at the large 5- light arched window, with panel tracery, hoodmould and label stops. Interior. Nave and aisles are separated by 5 bay arcades. The piers have square cores with a flat projection to each side and a further flat projection to the aisle sides. The other 3 sides each have a single demi-column on a rectangular plinth. The slender columns facing the nave once rose to the roof, they now support the c.1230 quadripartite vaulted ceiling with narrow ribs and 4 remaining bosses. The capitals of the larger columns are decorated with primitive volutes and a single central tongue.

Some of the bases of the columns are decorated. The arches have 2 steps. At tribune level is a string course running around the columns. The tribune openings are large, the arches have 2 steps and are supported by imposts. The northern openings have 3 C17 style windows. The clerestory windows each have an outer order of columns. The blocked north eastern bay has a grille in the east corner. In the blocked east wall is an arch which once lead to the choir. There is a double chamfered tower arch. The north aisle has crude depressed transverse arches and crude groined vaults, the eastern most bay is blocked off. There is a blocked arch in the west wall, this once lead to a spiral staircase. In the late C13 the south aisle was widened. There is double chamfered arch leading to the tower and a blocked arch in the west wall, once leading to a spiral staircase. The blocked east wall has a 2 bay opening, once leading to the transept, with moulded arches and centre octagonal pier with moulded capital. The northern, restored, respond has square shafts with a demi-column the south also has a carved head and moulded capital to the inner shaft. The C15 south aisle screen with tracery and cusping is vaulted either side, this and the C15 nave screen have painted panels. There is a further C15 traceried screen separating organ and south aisle. The C17 font is decorated with cherubs' heads and has a Jacobean style cover. The panelling in the south east end of the aisle is said to be preserved from the old pews and is dated 1656. The decoration corresponds to that on the C17 pulpit. In the south aisle is a C17 oak table; in the nave a C15 wooden alms box. There are scant remnants of a wall painting on the pulpitum. In the south aisle is a painting attributed to Fra Bartolomeo, c,1490 of St. Mary Magdalene. On the north wall is a large, fine and elaborate monument to Edward Mellish, 1703, by John Hancock. This comprises the figure of Mellish, reclining upon a chest tomb with his head resting upon one hand, above is the inscription with elaborate carved drapery over. Ionic columns support a segmental pediment with centre carved shield. Also in the north aisle is a coffin slab with worn cross and another rather more worn. In the tower is a coffin slab with foliated cross c,1300. Beside the north wall of the south aisle is a damaged recumbant knight in full armour, with cylindrical helmet and visor, c,1240. In the nave is a monument, 1772, to Catherine Hornby and Thomas Judson Gent. This has a decoratively carved cherub's head on the apron with an urn and swag flanked by single torches on the crown, and is by J. Wood.

Listing NGR: SK6240287286

Legacy

The contents of this record have been generated from a legacy data system.

Legacy System number:

416957

Legacy System:

LBS

Legal

This building is listed under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended for its special architectural or historic interest.

End of official listing

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PARISH ROOM

Overview

Heritage Category:
Listed Building


Grade:
II

List Entry Number:
1207580

Date first listed:
27-Nov-1984

Statutory Address:
PARISH ROOM, HIGH STREET

Map

 Ordnance survey map of PARISH ROOM

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This copy shows the entry on 25-Feb-2020 at 17:39:55.

Location

Statutory Address:

PARISH ROOM, HIGH STREET

The building or site itself may lie within the boundary of more than one authority.

County:

Nottinghamshire

District:

Bassetlaw (District Authority)

Parish:

Blyth

National Grid Reference:

SK 62554 86884

Details

SK 68 NW BLYTH HIGH STREET (west side)

2/49 Parish Room

G.V. II

Parish room, formerly toll cottage. Early C19. Brick. Stuccoed. Hipped slate roof projecting over the eaves and supported on wrought iron brackets. Single storey, 3 bays. Central doorway, panelled door with glazing bar overlight and wooden surround, flanked by single large casements with single wooden mullions. All openings have Tudor style hood moulds over. To the rear is a single storey single bay wing with single rendered stack.

Listing NGR: SK6254186910

Legacy

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Legacy System number:

241077

Legacy System:

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Legal

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End of official listing

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Date: 30 Jun 2001

Reference: IOE01/06476/33

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PARK FARM HOUSE

Overview

Heritage Category:
Listed Building

Grade:
II


List Entry Number:
1045125

Date first listed:
30-Nov-1966

Date of most recent amendment:
27-Nov-1984

Statutory Address:
PARK FARM HOUSE, HIGH STREET

Map

 Ordnance survey map of PARK FARM HOUSE

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Location

Statutory Address:

PARK FARM HOUSE, HIGH STREET

The building or site itself may lie within the boundary of more than one authority.

County:

Nottinghamshire

District:

Bassetlaw (District Authority)

Parish:

Blyth

National Grid Reference:

SK 62543 86913

Details

SK 68 NW BLYTH HIGH STREET (west side)

2/48 Park Farm House [Formerly listed as 30.11.66 Park Farmhouse (house next N of Parish Room)]

G.V. II

House. C17, altered early C18. Red brick on a coursed rubble plinth with chamfered ashlar quoins. Hipped roof with concrete pantiles and single central brick ridge stack. Wooden moulded cornice. 2 storeys, 3 bays, with 1st floor ashlar band. Central doorway, panelled door with painted bolection moulded ashlar surround and segmental pediment. Flanked by single glazing bar sashes with 3 similar sashes above, the central one being smaller.

Listing NGR: SK6254086912

Legacy

The contents of this record have been generated from a legacy data system.

Legacy System number:

241076

Legacy System:

LBS

Legal

This building is listed under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended for its special architectural or historic interest.

End of official listing

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Date: 30 Jun 2001

Reference: IOE01/06476/34

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ST JOHNS

Overview

Heritage Category:

Listed Building

Grade:

II

List Entry Number:

1370364

Date first listed:

04-Jan-1952


Date of most recent amendment:

27-Nov-1984

Statutory Address:

ST JOHNS, HIGH STREET

Map

 Ordnance survey map of ST JOHNS

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Location

Statutory Address:

ST JOHNS, HIGH STREET

The building or site itself may lie within the boundary of more than one authority.

County:

Nottinghamshire

District:

Bassetlaw (District Authority)

Parish:

Blyth

National Grid Reference:

SK 62608 86837

Details

SK 68 NW BLYTH HIGH STREET (east side)

2/46 S t John's (Formerly listed as The Old School)

4.1.52 G.V. II

Cottage, former Village School, and former Hospital of Saint John the Evangelist, refounded in 1226, rebuilt on this site in 1446 with older material. The windows were altered in the C17 and C20. Coursed rubble with ashlar quoins. Pantile roof, stone coped gables with kneelers and single finial to the right ridge, 2 brick gable stacks. Single storey plus garret, 4 bays. Set on a chamfered plinth. The doorway with wooden door and iron fittings has a C13 ashlar surround with dog tooth ornament to the jambs and segmental arch, there is a hood mould over. To the left is a C20 casement with cavetto hood mould. To the right are 2 similar casements and hood moulds. The east gable has a C17 blocked stone mullion window in the garret. The north front has a C17 5 light stone mullion window to the left and evidence of further, now blocked, mullion windows.

Listing NGR: SK6260686836

Legacy

The contents of this record have been generated from a legacy data system.

Legacy System number:

241074

Legacy System:

LBS

Legal

This building is listed under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended for its special architectural or historic interest.

End of official listing

Images of England

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Date: 17 Aug 2007

Reference: IOE01/16726/07

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Planning Policy
Queen's Buildings
Potter Street
Worksop
S80 2AH

VIA EMAIL

29883/A3/SJ/JB/MXS

26th February 2020

Dear Sir/Madam

REPRESENTATIONS TO THE DRAFT BASSETLAW LOCAL PLAN (REGULATION 18)

We write on behalf of our Client, Heyford Developments Ltd and welcome the opportunity to respond to the Draft Bassetlaw Local Plan (the 'draft Plan'). We respond in respect of our Client's land interests at Park Farm, Blyth ('the site', as shown on the appended red line plan). The site is currently being promoted through the Blyth Neighbourhood Plan ('BNP') for around 50 dwellings.

We set out our response to the draft Plan consultation in chronological order below.

Policy ST1: Bassetlaw's Spatial Strategy

This draft policy identifies that the District will accommodate a minimum of 9,087 dwellings (478 dwellings per annum) for the plan period 2018-2037. It states this will be delivered via the following spatial strategy:

- A minimum of 5,483 dwellings in Worksop, Retford and Harworth (the 'main towns');
- A minimum of 1,764 dwellings on sites allocated, or to be allocated in Neighbourhood Plans for the Large Rural Settlements (including Blyth);
- A minimum of 1,090 dwellings on non-allocated or sites to be allocated in Neighbourhood Plans for the Small Rural Settlements;
- A minimum of 750 dwellings at the Bassetlaw Garden Village (within the plan period, from a total 4,000 dwelling capacity).

In relation to the dwellings to be provided within the main towns; large rural settlements; and small rural settlements it is understood from the supporting evidence base (Land Availability Assessment, 2019) that 6,949 dwellings have planning permission; 540 dwellings are subject to a Neighbourhood Plan allocation, without planning permission; and 2,881 dwellings are to be allocated in the draft Plan. This provides an oversupply of around 1,689 dwellings (19.5%) against the proposed housing requirement of 9,087 dwellings (also taking into account completions from 2018/19).

However, the Land Availability Assessment (LAA) does not appear to factor in the potential for non-implementation (or a 'lapse rate') of these planning permissions and allocations. Paragraph 2.16 states "where deliverability is questionable sites will be discounted", but no further details are provided. There is no commentary provided on why lapse rates have not been considered i.e. local market conditions and/or evidence of implementation rates in the District. The suggested oversupply should therefore be treated with caution. Further consideration should be given to the level of risk associated with the potential for non-implementation of those sites identified in the supply in order to ensure the overall spatial strategy is deliverable. This would be in accordance with the Planning Practice Guidance on Housing and Economic Land Availability Assessments which states that an overall risk assessment should be made as to whether sites will come forward as anticipated (Paragraph 024 ID: 3-024-20190722).

Whilst the NPPF requires plans to meet 10% of the housing land supply via sites of 1 hectare or less, it should also be recognised that minor sites (9 or fewer dwellings) generally have a higher rate of non-implementation given the nature of the landownership and potential developers. The evidence and draft Plan should reflect upon the degree of reliance on these small sites within the rural settlements supply.

In relation to the proposed Bassetlaw Garden Village, the LAA assumes 60 dwellings will be delivered in 2024-2029; 420 dwellings in 2029-2034; and 270 dwellings in 2034-2037. Appendix C of the Assessment provides some further, yet brief, information on the site-specific trajectory. It states:

"Evidence (NLP Start to Finish, 2016) indicates the site is developable beyond 5 years. Large sites have a longer lead in period but deliver at higher rates once established. This timescale also accords with the development of Harworth Colliery which will eventually accommodate approx. 1,000 dwellings."

Further text within the LAA details that the Harworth Colliery site had a lead in time of approximately 8 years. We comment on this in more detail in our response to Policy ST3 below.

The Site Selection Methodology Background Paper (2020) provides justification for the selection of the Bassetlaw Garden Village (also referenced as Upper Moreton Garden Village LAA453/455) primarily in relation to its sustainable location and ability to provide for infrastructure. However, no information related to deliverability is provided. No further information on deliverability is provided in the Bassetlaw New Settlement Addendum Paper (2020). As set out below, we have significant concerns regarding the ability of this draft allocation to provide 750 dwellings within the Plan period, particularly in a sustainable manner (see comments below regarding public transport).

It is considered that the anticipated supply set out Policy ST1 and the LAA supporting evidence should be reviewed to take account of risks related to non-implementation (lapse rates) and to provide a trajectory for Bassetlaw Garden Village that relates to the site-specific circumstances.

In addition to this, the growth identified in Policy ST1 (and ST2) is in part reliant on the preparation of Neighbourhood Plans and their ability to identify sufficient sites which can deliver the identified housing. As an example, the draft Blyth Neighbourhood Plan is reliant on one site to deliver practically its entire housing requirement, despite there being no evidence on this being deliverable or developable. This may be the case for a number of other Neighbourhood Plans and this presents risks to the Council's housing supply.

Our comments in relation to the 20% growth 'cap' for Large Rural Settlements provided for in this draft policy are set out under Policy ST2: Rural Bassetlaw below. The spatial strategy needs to be revisited in light of this, as well as the issues we have raised with the Council's housing land supply and trajectory.

We consider further housing should be directed towards sustainable Large Rural Settlements such as Blyth for the reasons set out in our response to Policy ST2. This will have an effect on the spatial strategy and Policy ST1.

We support the uplift in the housing requirement to 478 dwellings per annum to support economic growth, however the spatial strategy needs to ensure that housing and employment needs are aligned, so that housing is proposed where there is demand for employment. As paragraph 3.5 of the draft Plan notes, 'the logistics sector continues to grow, with significant investment taking place, and market interest evidenced, along the A57 and A1 corridors'. The recently upgraded A1 junction to the north of Blyth offers a significant opportunity to meet this need and assist in delivering economic growth in the District. Housing should be located nearby to ensure jobs and workers are closely located and accessible by public transport – there are regular buses running between Blyth and the A1 roundabout to the north.

Unmet needs

Bassetlaw is within the defined North Derbyshire & Bassetlaw Housing Market Area (HMA) alongside North East Derbyshire, Bolsover and Chesterfield Councils.

The North East Derbyshire Local Plan is subject to an ongoing Examination, and Green Belt release is proposed to address housing needs. Within the North East Derbyshire Local Plan: Duty to Cooperate Draft Statement (March 2018) it states at paragraph 42 that:

“At the time of writing although no response had been received from Bassetlaw, it is considered that sites within Bassetlaw District would not relate well to the district and meeting the housing needs within North East Derbyshire.”

It is not clear what evidence is proposed to support this position given the authorities are within the same HMA. Bassetlaw have not published a Statement of Common Ground ('SoCG'), so it is unclear whether the Council has explored the potential to help assist with North East Derbyshire's housing needs. We consider that it should, given the duty to cooperate and paragraph 137 of the NPPF. This would also help to address a potential housing land supply issue in years 5 to 11 of the North East Derbyshire Local Plan, as identified at paragraph 17 of the Inspector's initial findings.

Further, the draft Plan needs to consider the linkages with the Sheffield City Region HMA, which includes Doncaster and Rotherham Councils. At page 141 of the Sustainability Appraisal Appendices, it is identified that there is a net outflow of workers, with 2011 census data indicating that the majority of the District's residents commuted to Doncaster, Sheffield and Rotherham (6,945 people). Doncaster and Rotherham were also the origin of most in-commuters into Bassetlaw District (4,395 people).

The Publication version of the draft Doncaster Local Plan identifies an unmet housing need (paragraph 6.5), although it identifies elsewhere that discussions have not identified housing or other needs that would be more appropriately shared with other local authorities (paragraph 1.3). This follows an apparently unsuccessful attempt to get neighbouring authorities such as Bassetlaw to assist. At page 23 of the Doncaster Revised Draft SoCG (August 2019), Bassetlaw are reported to state it is:

“Not considered appropriate to make provision for housing needs as Bassetlaw is currently developing the evidence underpinning their Local Plan, such as setting housing growth and economic growth targets and identifying Local Plan site allocations. Therefore it is not in a position to plan for any additional housing needs. It is also not considered appropriate to make provision for housing needs for an authority within a separate housing market area.”

It is accepted that Bassetlaw is within a different HMA. However there are clear functional relationships between the North Derbyshire & Bassetlaw HMA and the Sheffield City Region HMA. There are also clear relationships specifically between Bassetlaw and Doncaster and the draft Plan should do more to demonstrate how it could assist neighbouring authorities. Additional growth within Blyth could assist in respect of assisting Doncaster.

Suggested changes:

1. Publish a Statement of Common Ground to demonstrate compliance with the duty to cooperate in relation to outstanding matters including unmet housing needs from neighbouring authorities.
2. The anticipated supply set out in Policy ST1 and the LAA supporting evidence should be reviewed to take account of risks related to non-implementation (lapse rates) and to provide a trajectory for Bassetlaw Garden Village that relates to the site-specific circumstances (see our concerns set out in response to Policy ST3).
3. A mechanism for guarding against non-delivery of housing through Neighbourhood Plans should be included (see Policy ST2).
4. In light of the matters raised in relation to Policy ST1, and issues around supply, trajectory and deliverability, further growth should be directed to the sustainable settlement of Blyth.

Policy ST2: Rural Bassetlaw

This draft policy supports the delivery of sustainable development to meet the needs of Bassetlaw's rural area. The collective 2,852 dwellings to be delivered in the rural areas represents around 31% of the overall housing land supply for the District.

The draft policy identifies Large Rural Settlements (including Blyth) as accommodating a minimum of 1,764 dwellings in line with draft Policy ST1 (unless otherwise promoted through Neighbourhood Plans or through a masterplan framework agreed with the Council). The settlements are to individually accommodate a 20% increase on their base number of existing dwellings. The draft policy identifies Small Rural Settlements as accommodating a minimum of 1,090 dwellings, also applying a 20% 'cap' increase on their base number of existing dwellings. Therefore, of the total housing supply from Rural Bassetlaw (2,852 dwellings) the Large Rural Settlements could provide for around 62% and the Small Rural Settlements will provide for around 38%.

The base number of dwellings for the Parish of Blyth is identified as 553 dwellings (August 2018). A 20% housing increase in dwellings up to 2037 is proposed, equating to 111 dwellings. The draft policy states that:

"Most of the growth will be delivered through existing planning permissions or through allocated sites in made Neighbourhood Plans, or this Local Plan...All other housing development in these settlements will be located within settlement boundaries...and should not normally exceed 1 hectare in size."

The Spatial Strategy Background Paper (2020) provides an assessment of the services and facilities of the rural settlements (Figure 2). It identifies **Blyth as a Large Rural Settlement** by virtue of it having a shop, doctors, post office, primary school and village hall (as well as at least 500 dwellings).

As a result of draft Policy ST2 specifying a 20% growth cap to both Large and Small Rural Settlements, some Small Rural Settlements with around 400-500 dwellings (such as Clarborough and Welham, East Markham, Rhodesia, Walkeringham) that have fewer services and facilities relative to Blyth are identified for a similar level of housing growth as Blyth. The Spatial Strategy

Background Paper (2020) does not appear to provide further detail on why a 20% cap was considered appropriate, other than the following:

“[it] will build some flexibility for rural communities to plan for their growth, regenerate previously developed sites and cater for the specific housing needs of their area” (page 12).

It is also not clear from the commentary within the Spatial Background Paper or the accompanying Sustainability Appraisal if the Council has considered the option of apportioning a higher level of growth to the Larger Rural Settlements (i.e. above the current 62% of rural supply they are due to provide). Chapter 4 (paragraphs 4.2-4.6) of the Sustainability Appraisal details the range of spatial options considered in previous 2019 Part 1 Draft Plan. This includes a series of options for rural settlements, including testing of the 20% growth cap. Additional options were subsequently tested for Rural Bassetlaw growth overall (paragraph 4.18) but it does not appear to include an option for a higher level of growth just for the Large Rural Settlements.

The supporting text recognises that the Large Rural Settlements:

“are the most sustainable due to them having the largest populations, having higher numbers of journeys made to employment, shops and services and having the most frequent and commercially public transport services to nearby larger towns and cities...focusing rural development there will help to support existing facilities and provide a focal point for use by residents of surrounding smaller villages and hamlets” (paragraph 5.1.28).

The draft Plan and supporting evidence should further recognise the relative sustainability of Blyth (and the Large Rural Settlements overall) as a location for future growth and should consider the potential for a higher proportion of growth being allocated to the Larger Rural Settlements. Given the uncertainty with regards to the Garden Village trajectory, outlined under Policy ST1 above (which represents around 8% of the overall District housing land supply at present) the Large Rural Settlements could sustainably accommodate some of this supply, providing the draft Plan with greater flexibility and certainty of delivery. As noted in our response to Policy ST1, this should also consider the relationship between housing and employment, and the opportunities presented by the upgraded A1 junction to the north, which is accessible from Blyth via a short bus journey.

Parts D and E of the draft policy provide for circumstances where growth above the 20% 'cap' will be supported. Supporting text to the draft policy (paragraph 5.2.16-5.2.17) entitled "*Demonstration of clear local community support*" states "*Part D of this policy requires community consultation to be undertaken where a proposal would result in the total Rural Growth requirement for a settlement being exceeded.*" This could either be demonstrated via a 'made' Neighbourhood Plan or via a "*proportionate pre-application consultation exercise*". Part E of the policy refers to the need for "*robust, proportionate pre-application community consultation...as evidence of community support. In all cases, support of the Parish or Town Council will be required.*" Appendix 4 then identifies that community support for a scheme can be demonstrated by a majority of individuals who respond positively, however the proximity of objectors or supporters may also be considered. The degree of weight being afforded to local community support in this policy is questionable. Whilst the opinions of the local community are important to consider through the planning process, there are a wider range of material considerations that should also be appropriately assessed. It is considered that this element of the draft policy should be removed. This is particularly important given the points we raise above in relation to Policy ST1 and the potential for Neighbourhood Plans to allocate sites which may not be ultimately deliverable or developable.

Policy ST2 should also include a reference to the need for ongoing monitoring of delivery and supply within the Parishes. It should make provisions for instances where Neighbourhood Plan allocations (or permissioned sites) are not being implemented, and the 20% growth not being achieved. The policy should state that in these circumstances a review of those allocations will be necessary and additional supply will be brought forward ahead of such reviews via a reasonable

criteria-based policy, so as to ensure an ongoing supply of housing (in accordance with NPPF paragraphs 73-75) The criteria-based policy could reflect that of the current Bassetlaw District Core Strategy (2011) Policy CS1 and approach of the Council in relation to developments outside of the settlement boundaries (as stated in the Authority Monitoring Report (AMR) 2016/17 in relation to Indicator H5: Number of houses built and permitted outside the settlement boundaries).

Suggested changes:

1. The draft Plan should revisit the arbitrary 20% cap applied to Small and Large Rural Settlements. Additional growth should be directed to more sustainable settlements such as Blyth. This should consider the relationship between employment and housing growth. The Sustainability Appraisal needs to assess this as a reasonable alternative.
2. The policy should remove reference to the weight to be afforded to local community support in determining applications as this could undermine the assessment of an application on its merits.
3. The policy should incorporate an ongoing monitoring of delivery and supply within the Parishes, with a policy basis to support additional supply in the event Neighbourhood Plan allocations are not being delivered.

Policy ST3: Bassetlaw Garden Village

As detailed in our response to Policy ST1, there are significant concerns regarding the deliverability of the proposed Garden Village. The policy identifies that a 'Consultative Group' of stakeholders and landholders is to be formed, with a masterplan and SPD for the overall site to be prepared. Whilst not specified in any of the supporting evidence, it is understood that the site is in multiple private landownerships at this time and that the proposals are in their infancy. The supporting text to Policy ST3 also details the extensive infrastructure requirements necessary to deliver the overall scheme, including a new railway station, new access roads and a new public transport hub (these are detailed further in the Draft Infrastructure Delivery Plan, 2020). We would query whether these costs have been considered fully as part of the viability work supporting the draft Plan. The Bassetlaw Interim Whole Plan & CIL Viability Assessment (August 2018) appears to take a general approach to development across the draft Plan, rather than looking at the very specific and significant costs and cash flow issues for a new settlement. It states that the approach to abnormal construction costs (including utilities diversions) is "*based on generic tests*" (page 28) and then assumes a generic cost of mitigation of £2,000 per dwelling that are "*based on historic evidence of planning obligation contributions over the last five years (excluding Affordable Housing which is factored in separately) the following cost allowances have been adopted in the study*" (page 30). This figure is substantially short of the real costs of delivering a development of this scale in this location. The Aecom January 2018 publication 'Garden towns and villages cost model' suggests that a new garden village in 5,000 residential units on a 350 hectare greenfield site in the South East of England would have construction costs of £53,568 per unit. The very high cost of strategic infrastructure and the impacts on cash flow (which isn't mentioned in the Council's evidence), needs to be considered in detail to demonstrate deliverability.

A new railway station is proposed, but this is only safeguarded and is not expected to come forward until after 2037. No costs are attributed to this as it is outside of the Plan period. We query who will be paying for this and how will it be secured – is there any certainty of deliverability? The interim solution appears to be a bus subsidy, which as set out in the IDP, is estimated to cost around £590/dwelling (paragraph 3.2.12). This cost appears broadly reasonable, but further detail is required to understand what money needs to be paid upfront to secure the service, and the implications this would have on cashflow. There is no detail on what this bus service may look like – is it a conventional bus on non-segregated roads? How regular would it be? The attractiveness of this service is critical to encouraging modal shift for the occupants in this relatively isolated new settlement before 2037. This is fundamental to the success of the allocation. This is supported by

the Inspector's initial findings into the Uttlesford Local Plan (10th January 2020), where in relation to a proposed garden settlement it was concluded that:

"44. Whilst appreciating the difficulties in providing a full RTS service from the outset and recognising the role of incremental improvements, in our view, the lack of a RTS until towards the end of the plan period would mean the modal shifts anticipated would not be realised. Moreover, the use of less sustainable modes of travel could have become engrained in the habits of residents living in the homes built within the early phases of the Garden Communities. According to the latest trajectory in ED51 this would be well in excess of 1000 homes.

...

46. This being so, there is a danger that the Garden Communities would be served by little more than a conventional, regularly running bus service for a good number of years. This would use the existing road network, which is at times congested and there are concerns that such a bus service would be no quicker, and potentially slower, than travelling by car. It is also unclear to what degree the buses would run on existing roads as opposed to segregated bus lanes or busways and how the latter would be phased in.

47. Buses running on existing unsegregated carriageways, even based on a 10 or 15 minute service, is unlikely to encourage the residents to use their cars less for local journeys, despite this being better than the services that operate in Uttlesford at present. We consider this would be directly at odds with Garden Community Principle 7 which requires integrated and accessible transport systems, with walking, cycling and public transport designed to be the most attractive forms of local transport."

These initial findings are appended to this letter as they are highly relevant for the preparation and soundness of a Local Plan that proposes a new settlement. The ongoing Examination into the North Essex Garden Communities is also relevant, particularly in relation to a deliverable sustainable transport approach.

In determining the trajectory for the site, it is considered to be inappropriate to draw direct comparisons between the Garden Village proposal and other large schemes in the District (namely the Harworth Colliery site) which appear to be very different in both scale and site-specific circumstances. For instance, the latter site is in single ownership (Harworth Estates) and provides 1,000 dwellings overall (which may increase to 1,300 dwellings, dependent upon the outcome of a current outline planning application on the site) with lesser infrastructure provision requirements. The Garden Village proposal represents a significantly larger scale scheme with multiple landowners, and it is not clear what formal partnership or agreements are in place. There are also significant infrastructure requirements for the site overall, and there do not appear to be any phasing plans to indicate at what point different items of infrastructure will be required to enable the envisaged development trajectory.

Overall, it is considered that there is limited evidence related to deliverability which justifies the trajectory for the Garden Village at this stage. This means that this element of the anticipated supply for within the plan period should also be treated with caution.

Suggested change:

1. Address the significant concerns in relation to the proposed Garden Village. Further detail is required to demonstrate that it is deliverable and that it can contribute 750 dwellings within the Plan period in a sustainable manner in line with the Garden Community Principles.

We trust these representations are helpful to inform the next stage of the Local Plan. Should you require any clarifications of the points raised please contact me or Mark Sitch.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'J Bonner', is positioned above the typed name.

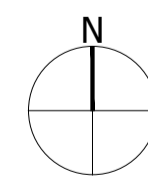
JAMES BONNER
Associate Planner



Project
Park Farm, Blyth

Drawing Title
Contract Plan

Date	Scale	Drawn by	Check by
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10 January 2020

Mr. Stephen Miles
Planning Policy Team Leader
Uttlesford District Council
London Road
Saffron Walden
Essex
CB11 4E

By email only

Dear Mr Miles

EXAMINATION OF THE UTTLESFORD LOCAL PLAN

Introduction

1. Stage 1 hearing sessions were held between 2nd and 18th July 2019. We heard a great deal of evidence, some of which has required further formal targeted consultation and hence why it has taken us some time to fully consider everything put to us and to formally respond. This letter describes our findings in relation to several key matters and the plan's soundness.
2. Unfortunately, despite the additional evidence that has been submitted during the examination and all that we have now read and heard in the examination, including the suggested main modifications to the plan (ED41) put forward by the Council, we have significant concerns in relation to the soundness of the plan. In particular, we are not persuaded that there is sufficient evidence to demonstrate that the Garden Communities, and thus the overall spatial strategy, have been justified. We therefore cannot conclude that these fundamental aspects of the plan are sound.
3. It is not the intention of this letter to cover every matter that was discussed at the hearing sessions. Our letter focuses on those aspects of the plan and its evidence base which we do not consider to be justified. It also advises on specific changes that would be needed to some of the plan's policies. More detailed matters, and aspects of the plan that would not require significant further work at this stage or have not been subject to hearings sessions, are not dealt with here.

4. Also, we have not taken account of examination documents received after ED76 (October 2019), in this letter since there has come a point where we have had to draw a line under new documents submitted by the Council, not only so we could finalise this letter and thus ensure the examination is dealt with in an expeditious manner, but also because these documents have not been consulted upon and were not requested by us.
5. To clarify, the plan is being examined under the transitional arrangements set out in Annex 1 to the revised National Planning Policy Framework (the Framework) 2019. As such, the policies in the previous version of the Framework published in 2012 (and the associated version of the Planning Practice Guidance (the Guidance)) continue to apply. References in this letter to the Framework and the Guidance are therefore to those previous versions.

Proposed Garden Communities in General

Introduction

6. The Framework acknowledges that *'the supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns that follow the principles of Garden Cities. Working with the support of their communities local planning authorities should consider whether such opportunities provide the best way achieving sustainable development'* (paragraph 52).
7. The plan contains three Garden Communities which are known as, Easton Park, North Uttlesford and West of Braintree. They are relied upon for the delivery of much of the new housing in the remainder of the plan period, and well beyond. In total they are expected to deliver around 18,500 new market and affordable homes.
8. In general terms we are concerned about the lack of evidence before us to enable us to conclude these parts of the plan are sound. Whilst we realise it is the Council's intention to lay down much of the detail of the proposed Garden Communities in further Development Plan Documents (DPDs), following the adoption of the plan, it is this examination which must determine whether the Garden Community proposals are properly justified and realistically developable. This is of major importance in this case given the large scale and long-term nature of the Garden Community developments, combined with the fact that they would be the primary source of housing in the district for the next 30 to 40 years.

Spatial Strategy and Sustainability Appraisal

9. We are concerned that all the reasonable alternatives tested in the Sustainability Appraisal (2018) (SA), included all three Garden Communities with varying degrees of other development, except one (option 3) which included no Garden Communities. No testing was carried out with say two Garden Communities, along with other development at existing settlements. This potential shortcoming of the SA is acknowledged in paragraph 8.165, but there is no explanation as to why such a scenario was not tested. This is a serious omission and has, in part, led to

fundamental problems with the overall spatial strategy which we set out later in our letter.

10. Also, in the 'Appraisal findings for the spatial strategy options' section of the SA (pages 431-448), option 1 (preferred option that is the submitted plan strategy) and option 2a (less development at Garden Communities and more at towns/villages (with a train station)) score equally in all of the 15 SA objectives. However, this was undertaken before the Council's Heritage Impact Assessment (HIA) (Donald Insall Associates January 2019) was published, albeit Historic England had raised objections to the North Uttlesford Garden Community at that stage.
11. In addition, SA objective 9 (to promote and encourage the use of sustainable methods of travel) testing was undertaken on the understanding that Easton Park and West of Braintree would provide a new Rapid Transit System (RTS) which would be delivered in phases alongside housing, employment and other infrastructure. Later in our letter we question whether a RTS would be delivered in the early years of the Garden Community developments. This adds to our concerns about the robustness of the SA.

Garden City Principles

12. The plan at paragraph 3.78 and in Policy SP5, sets out the Garden City Principles developed by the Town and Country Planning Association and advises that the Garden Communities will be developed in accordance with them. We share the Council's view that it is reasonable that these principles should be key pillars in the development of the Garden Communities in Uttlesford. Principle 1 concerns land value capture for the benefit of the community. Strong vision, leadership and community engagement are identified in Principle 2. Principle 3 expects community ownership of land and long-term stewardship of assets. However, the mechanisms by which these guiding principles will be delivered and ensured are not readily evident in the plan.
13. During discussions at the hearings it was suggested by one of the site promoters (West of Braintree) that land value capture for the community would not be realised. Additionally, the site promoter at Easton Park questions the need for a Quality and Collaboration Partnership (QCP), as set out in the Council's Focused Change 4 to Policy SP5. This objection is sustained in ED66 (Statement of Common Ground between the Council and Landsec).
14. We understand that the Council has introduced the QCP as a mechanism to ensure that the public and private sectors can together deliver strategic growth over several plan periods, and still ensure that the fundamental Garden City Principles (such as community engagement, long term stewardship, and to ensure that a holistic approach can be assured) are adhered to. The site promoter at Easton Park considers the QCP to be unnecessary and to replicate the planning system. Additionally, they cannot agree with the Council what the QCP will do (if it is to be accepted as a concept).

15. Furthermore, whilst it is understood that the Delivery Board for North Uttlesford has already been established, ED66 also highlights disagreement between the Council and the site promoter at Easton Park in relation to the terms of the Delivery Board that will oversee the plan making, delivery and implementation of that Garden Community. All these matters cast some doubt as to whether these vital Garden Community Principles would be met in Uttlesford. Without assurances that the necessary mechanisms outside the plan would be put in place, we cannot be content in principle that the new proposed settlements would be true Garden Communities, or that the plan's stated vision for these new settlements would be met. This is a serious concern.

Policies Map

16. The broad locations for the three Garden Communities are shown on the Policies Map and each is intended to be the subject of a detailed DPD which would determine, among other things, the full extent of the land required and the nature and form of the new communities. Nevertheless, Policies SP5, SP6, SP7 and SP8 set out the principles for the development for the Garden Communities along with a number of site-specific requirements.
17. We are concerned that the boundaries of the Garden Community site allocations are not shown on the Policies Map. This is not a matter to be left to DPDs. We cannot find the plan sound based on vague blurred annotations of broad locations, especially for something as significant as three large new communities. Indeed, The Town and Country Planning (Local Planning) (England) Regulations 2012, require that the adopted plan contains a Policies Map that illustrates geographically the application of the policies in the adopted development plan. The site boundary lines would need clearly defining on the Policies Map and need to include land to be safeguarded for transport and any other infrastructure.

Delivery of Market and Affordable Housing

18. The housing requirement for Uttlesford for the whole of the plan period (2011 to 2033) is 14,000 net additional homes. The quantum of new homes expected to be delivered in the remainder of the plan period (up to 2033) in the Garden Communities was proposed by the Council to be reduced from 4820 to 4190 during the stage 1 hearing sessions through a revised housing trajectory (ED51). This is against an overall requirement in those 10 years (2023/24 to 2032/33) for 7190 dwellings. In addition, changes to the anticipated start dates have occurred with delivery in Easton Park and North Uttlesford being pushed on by one year from 2022/23 to 2023/24 and some of the yearly delivery rates have also been amended. Our comments in this letter are based on this revised housing trajectory.
19. The Garden Community site allocations are for a very significant number of homes, over a considerable period, and all three would be developed more or less simultaneously. This would bring about a substantial amount of development and consequential change over a long timescale. Development of this scale and timing on three large sites in one essentially rural district is highly aspirational and ambitious. As such, it is vital that the Garden Communities are justified and deliverable. The Framework indicates that '*Local Plans should be aspirational but realistic*' (paragraph

154) and one of the key tests of soundness is that the plan should be effective, that it is, *'deliverable over its period and based on effective joint working on cross boundary strategic priorities'* (paragraph 182).

20. The latest housing trajectory relies on commencement dates in relation to Garden Communities in North Uttlesford and Easton Park, which we consider to be extremely optimistic considering the current timetable for the adoption of the plan and the overly ambitious timescales for the production and adoption of the DPDs (and the submission and approval of planning applications for the Garden Communities).
21. The Council has provided an update on the timelines for the production of the DPDs for Easton Park and North Uttlesford in Appendix 1 to ED30. This indicates that work on the preparation of the DPDs commenced in June 2019 and we acknowledge that the Council has appointed three members of staff to work on them. However, the update shows that despite consultations being timetabled with the Community Forums for July 2019, appointments to the Local Delivery Boards and the setting up of the Community Forums were yet to be completed at this point.
22. No indication as to how long this might take is given. Whilst ED71 provides a further progress report and indicates that members of the Community Forums have been identified, meetings have not yet been held. Thus, there is already some evidence of slippage in the timetable and the missing of key milestones. Bearing in mind the other subsequent stages set out in the timetable (including the Council's own three stage approval process), it is difficult to see how public consultation on the DPDs would realistically commence early in January 2020 as anticipated.
23. The proposed trajectory is even more optimistic if the promoters of the Garden Communities do not intend to submit planning applications until the DPDs have been adopted (as indicated by the promoter for Easton Park). The Council's timetable assumes promoters would twin track outline planning applications alongside the DPD preparation and examination process.
24. Although we note the North Uttlesford site promoter's willingness to prepare an outline planning application alongside the DPD, we share the Easton Park site promoter's reservations about how such an arrangement would work in practice. This is particularly so given the considerable amount of detail (including, as things stand, the defined site boundaries) that is to be left to the DPDs and the high level of uncertainty, potential wasted expense and associated risks that would be involved without the comfort of advancing a planning application which is in line with an adopted DPD.
25. The promoters of Easton Park have confirmed that they envisage first completions in around September 2025, approximately 2 years after the Council's estimate of 2023/24. All these factors point to the timetable not being realistic. Indeed, there seems to be a lack of recognition on the Council's part as to how complex and challenging it would be to deliver the

three Garden Communities and a lack of appreciation as to the delays that are very likely to occur.

26. The promoters of Easton Park argue for the details of the Garden Communities to be dealt with by Supplementary Planning Documents (SPDs) rather than DPDs, to speed up the process. However, since SPDs cannot set policies and are not subject to independent examination, proceeding down the route of SPDs would require the plan to contain far more detail than it does at present. Additionally, SPDs carry less weight in future decision making as they are not part of the development plan. With something so fundamental as large new Garden Communities it is our firm view that the key details need to be committed to DPDs which would be examined and adopted.
27. Overall, we strongly believe that the Garden Communities will not deliver the quantum of housing in the plan period that the Council's housing trajectory shows. Consequently, the housing requirement for the plan period would not be met.
28. Turning to consider the 5-year HLS situation, the revised housing trajectory (ED51) shows that the Council would have a 5.10 year HLS on adoption of the plan, based on a stepped trajectory and including a windfall allowance and two of the Garden Communities delivering houses in 2023/24. This has since been updated in ED73, a document entitled *Housing Trajectory and 5 year land supply statement 1 April 2019* (published October 2019). In this document, Table 6 shows a 5 year HLS calculation, taking account of the emerging plan and factors in the 'oversupply' of housing against the plan target since 2011/12 (the plan start date). This would provide a HLS of 5.65 years.
29. This calculation relies on the use of a reduced annual requirement of 568 dpa for most of the years, as it is based on the stepped trajectory set out in Policy SP3. It is also based on what we consider to be unrealistic commencement/housing delivery dates for two of the Garden Communities (North Uttlesford and Easton Park, as set out above). So, whilst the Council can, in theory, demonstrate a 5.65 year HLS, we are concerned that if the housing delivery at North Uttlesford and Easton Park slips by just one year, as seems very likely, this would result in 100 less dwellings in this 5 year period. This would result in a very fragile 5 year HLS position.
30. An additional factor is that around 14,000 homes allocated in the plan would be delivered after the plan period. As such, the plan is establishing the growth strategy for meeting the Council's long-term needs. Clearly it is not a problem to look beyond the plan period, but the number of homes that would be effectively allocated beyond the plan period would be similar to the identified OAN figure for the current plan period.
31. However, the scale of the need for housing for the next plan period is currently unknown and uncertain. We are concerned that the Council's chosen strategy would mean that other sites in the district would not be developed or permitted for a significant period of time in the future. This would be likely to adversely affect the vitality and viability of services in

existing towns and villages and result in a lack of housing choice in the market. It would also be difficult to accommodate changes in demand for certain types of development/services required over the very long period being committed to within the current strategy.

32. Furthermore, if the three Garden Communities allocated in the plan are granted planning permission and then work is commenced on site, it would be very difficult to deviate from this strategy. To do so, and to leave the intended Garden Communities effectively uncompleted, could potentially result in relatively small pockets of residential development in the open countryside that would not have the sustainability credentials of Garden Communities and would not ordinarily be supported. The Framework recognises that it is crucial that Local Plans should *'allocate new sites to promote development and flexible use of land, bringing forward new land where necessary...'* (paragraph 157). The current strategy which relies on the Garden Communities to deliver 4190 dwellings in the period 2023/24 – 2032/33 (the end of the Plan period), against a target in this period of 7190 dwellings carries with it significant risks and a lack of flexibility.
33. Finally, the Framework (paragraph 47) requires local planning authorities to *'use their evidence base to ensure that their Local Plan meets the full objectively assessed need for market and affordable housing in the housing market area...'* It also requires that through a Strategic Housing Market Assessment, local planning authorities should understand housing needs in their area and identify the housing that the local population is likely to need over the plan period which (amongst other things) addresses the need for all types of housing including affordable housing (paragraph 159).
34. The Council accepts that there is already an affordability issue in the district. The supporting text to Policy H6 states that there are, and will continue to be, many households in Uttlesford lacking their own housing or living in housing that is inadequate or unsuitable, who are unlikely to be able to meet their housing needs in the housing market without some assistance. The proposed stepped trajectory which arises from the strategy's reliance on the Garden Communities, would result in a worsening affordability problem as it would delay the provision of housing to meet the identified need in the district for a number of years. This is also a significant concern.

Employment Use

35. Whilst noting the main modifications suggested by the Council to provide indicative figures for employment floorspace in the Garden Communities (MM/03/15, 16, and 17), we are concerned that at this stage there is no information about where in the Garden Communities employment uses would be provided and more importantly when they would be delivered. The ethos of Garden Communities is that they are sustainable.
36. Garden Community Principle 4 envisages a wide range of local jobs within easy commuting distance from homes. Ideally, as many residents as possible would live and work within the Garden Communities and thus reduce the need to travel long distances to work, especially by private car.

Policy SP5 envisages that each Garden Community would demonstrate high levels of self-containment.

37. This is more likely to be successful if the employment uses, or at least some of them, are provided during early phases of development. Otherwise there is a risk that the Garden Communities would become little more than commuter settlements. This would require further work to be undertaken, in conjunction with the site promoters, to at the very least identify zones within the Garden Communities where the various employment uses will be located, at what stage they will be completed and how they will be delivered.

Transport and Infrastructure

38. This section of the letter deals with transport and infrastructure matters where they are interlinked or generic. Other separate matters are dealt with in the specific sections dealing with the individual Garden Communities later in our letter.
39. It is a core planning principle of the Framework to *'actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling and focus significant development in locations which are or can be made sustainable'* (paragraph 17).
40. The Guidance, at paragraph: 001 Reference ID: 54-001-20141010 advises that *'it is important for local planning authorities to undertake an assessment of the transport implications in developing or reviewing their Local Plan so that a robust transport evidence base may be developed to support the preparation and/or review of that plan. A robust transport evidence base can facilitate approval of the Local Plan and reduce costs and delays to the delivery of new development, thus reducing the burden on the public purse and private sector. The transport evidence base should identify the opportunities for encouraging a shift to more sustainable transport usage, where reasonable to do so; and highlight the infrastructure requirements for inclusion in infrastructure spending plans linked to the Community Infrastructure Levy, section 106 provisions and other funding sources'*.
41. The Uttlesford Local Plan Infrastructure Delivery Plan July 2019 (IDP) (ED27 and ED27A) downgrades several highway infrastructure items from 'critical' to 'necessary' (compared to an earlier version), such that they are no longer required to be in place before development at the Garden Communities can commence. In particular, a RTS is proposed for West of Braintree and Easton Park (also referred to as Bus Rapid Transport (BRT)).
42. The plan seeks to bring about a step change increase in sustainable travel modes at both Easton Park and West of Braintree, to achieve significant use of public transport, with trips by active modes and public transport making up to 60% of all trips (paragraphs 3.90 and 3.107 of the plan). Policies SP6 (Easton Park) and SP8 (West of Braintree) both require from the early delivery phase a high quality, frequent and fast rapid transport measure to be provided. Also, there was general agreement amongst all the parties, including the Council, at the hearings that the RTS would need to be in

place from the early delivery phase of the Garden Communities to fulfil their anticipated role and to meet these ambitious targets and the modal shift relied upon.

43. In this context it is difficult to understand why the RTS is classified as 'necessary' rather than 'critical' in the IDP given that it is fundamental to the delivery of two of the largest sites allocated in the plan. This downgrading is also evident in the Council's response to the targeted representations (ED72). With reference to ED13 (Bus Rapid Transport for Uttlesford Supplementary Technical Study), the Council confirms that in the early phases the Garden Communities would be served by a conventional bus service, with a RTS only coming online when there is population to support it, (2029–2033).
44. The Council also advises that it is not necessary to delay the housing delivery to allow for the delivery of the RTS. Whilst appreciating the difficulties in providing a full RTS service from the outset and recognising the role of incremental improvements, in our view, the lack of a RTS until towards the end of the plan period would mean the modal shifts anticipated would not be realised. Moreover, the use of less sustainable modes of travel could have become engrained in the habits of residents living in the homes built within the early phases of the Garden Communities. According to the latest trajectory in ED51 this would be well in excess of 1000 homes.
45. There is valid, widespread concern, shared by us, that the infrastructure serving the Garden Communities would fail to meet the true BRT standards until after 2033. Table 3-2 of ED13, shows that after 2033 it is predicted that there would be a service every 5 minutes, between 6am and 10pm. This would be around 8-10 years after the delivery of the first homes. From 2024 until 2033, services would gradually increase from every 15 minutes to every 10 minutes. But this would depend upon commercial viability.
46. This being so, there is a danger that the Garden Communities would be served by little more than a conventional, regularly running bus service for a good number of years. This would use the existing road network, which is at times congested and there are concerns that such a bus service would be no quicker, and potentially slower, than travelling by car. It is also unclear to what degree the buses would run on existing roads as opposed to segregated bus lanes or busways and how the latter would be phased in.
47. Buses running on existing unsegregated carriageways, even based on a 10 or 15 minute service, is unlikely to encourage the residents to use their cars less for local journeys, despite this being better than the services that operate in Uttlesford at present. We consider this would be directly at odds with Garden Community Principle 7 which requires integrated and accessible transport systems, with walking, cycling and public transport designed to be the most attractive forms of local transport.
48. It would also run contrary to proposed Main Modification MM/3/19 to Policy SP5 which seeks to introduce new text indicating that the new communities will be planned around a step change in integrated and sustainable

transport systems that puts rapid transit networks, among other things, at the heart of growth in the area.

49. It is unclear at this stage which routes would be used for the RTS and how much of the routes would be shared with existing road users or on segregated/dedicated bus ways/lanes. As such, these have not been mapped or costed. This being so, the need for additional land to be identified/safeguarded in the plan to ensure the route of the RTS cannot be ruled out.
50. Accordingly, the scale and nature of the necessary road improvements and details of any vehicle restrictions that may be needed on the RTS route (and other routes) have not been set out. Additionally, little consideration has been given to whether there are likely to be any land assembly issues and/or costs or if Compulsory Purchase Order (CPO) powers would be required to deliver the route (and how long these processes would take).
51. Furthermore, consideration would need to be given to the impact on heritage assets, biodiversity, character and appearance and landscape of any sections of the route that would not utilise existing roads. It is also evident from the Council's response in ED72 that much work is yet to be done to establish how the route would be achieved to Stansted Airport.
52. Reference is made to the possibility of a 'new direct connection' between the airport and the road network to avoid the use of the airport entrance roundabout by the RTS. All these matters are likely to have a bearing on the costs and timing of the RTS, and so its viability and deliverability, and are yet to be properly considered.
53. Policy S6 relating to Easton Park, anticipates bus/rapid transport measures to Great Dunmow and beyond. In considering sustainable transport, ED52 (Statement of Common Ground between Landsec and Essex County Council) states that the Council and the Highway Authority have developed a BRT proposal for the Local Plan which connects Stansted Airport to Braintree via Easton Park, Great Dunmow and West of Braintree.
54. However, the Council's responses in ED72 confirm that the RTS could be provided in discreet segments and that any links via the RTS to West of Braintree (from Easton Park) would only be provided beyond the plan period. These positions do not seem to be aligned. Whilst appreciating that Easton Park and West of Braintree have different and separate employment destinations, in simple terms the absence of the RTS to West of Braintree and the town of Braintree beyond would mean that for trips eastwards to meet needs other than employment, the future residents of Easton Park would be without the sustainable transport options offered by the RTS.
55. We are also conscious that ED13 and ED36 are predicated on what is now an out of date housing trajectory and are concerned that the delivery of fewer homes than previously anticipated in the early years of the plan at Easton Park and West of Braintree has the potential to affect the delivery of the RTS.

56. The Council accepts that more work is required in relation to the RTS. Paragraph 177 of the Framework indicates that it is *'important to ensure that there is a reasonable prospect that planning infrastructure is deliverable in a timely fashion. To facilitate this, it is important that local planning authorities understand district wide development costs at the time Local Plans are drawn up'*. In this instance, considerable additional information would be required to establish that the RTS is a practical and viable solution and that it would be delivered at the time it is needed. Section 5.2 of (ED13) identifies the need for a strategic outline business case be developed alongside improved forecasts from a transport model.
57. In ED72 the Council responds to many of the concerns raised in the targeted consultation by acknowledging that further work is needed but indicates that such details would be available at the strategic planning stage. However, this plan is the strategic planning stage. It includes strategic policies, and these include two Garden Community site allocations that are predicted to begin delivering housing in 2023/24 in the case of Easton Park, and 2025/26 in the case of West of Braintree. We cannot agree that the evidence before us as set out principally in ED13 Bus Rapid Transport for Uttlesford - Supplementary Technical Study June 2019 and ED36 Further Information on Bus rapid Transport Modelling, provides a level of detail sufficient to show that the proposed RTS is practical in principle.
58. Easton Park and West of Braintree are reliant on the RTS to ensure they are sustainable communities, and it is critical that the evidence to support it is provided at this stage. It is not sufficient to say that these really important matters would be resolved at a later date. This work would need to be done now so that the development plan provides the necessary certainty of delivery, particularly given the housing trajectory before us and the significant reliance on Easton Park and West of Braintree to deliver homes (in the case of Easton Park within the next 5 years).
59. Finally, regarding infrastructure, the Framework sets out that it is *'crucial, Local Plans should plan positively for development and infrastructure in the area...'* (paragraph 157) and we continue to be concerned that significant gaps remain in the IDP for the cost of the provision of gas, water, waste, wifi/broadband and significant amounts of the social infrastructure items such as allotments, play space, amenity green space, to name a few. There are also considerable variations in estimated costs for 'big ticket' items, including transport infrastructure. For example, the A11/A1301/Stumps Cross Roundabout improvements are estimated to be between £5 million and £10 million and the improvements at B1256/A120 Dunmow Hoblongs junction are estimated at between £2 and £10 million.
60. There is also a lack of clarity about what the various planned sustainable transport upgrades would cost and until this is known and built into a robust viability assessment the viability of these Garden Communities is an unknown. Overall, the lack of evidence in relation to transport and infrastructure reinforces our concern that the Garden Community policies are not justified and effective.

Viability

61. The Framework advises that *'pursuing sustainable development requires careful attention to viability and costs in plan making...'* and states that *'plans should be deliverable'* (paragraph 173). The Viability Assessment 2018 (VA) carried out by Troy and Three Dragons was undertaken prior to the most up to date IDP and the revised housing trajectory. Moreover, as previously set out, there are a number of 'big ticket' items in the IDP, some of which would require funding up-front before any returns on the development would be seen. In addition, the IDP has many infrastructure items that have no known costs, as set out above.
62. The VA makes broad brush assumptions about the infrastructure costs for the three Garden Communities, based on typologies. It clearly shows in graph form the significant difference a change in infrastructure costs of £10,000 per dwelling (£50,000 as opposed to £40,000), can make to viability and so it is critical that this figure is as accurate as possible. Therefore, it is important that the viability assessment should use the most up to date infrastructure cost estimates rather than case studies and be based on maximum costs where there is a range. This is particularly important given the VA does not contain any specific contingency allowance.
63. Also, Appendix B to *Viability Testing Local Plans – Advice for planning practitioners (June 2012)*¹, advises in relation to costs of promoting schemes and associated fees that on large scale schemes care needs to be taken not to underestimate these. It suggests that fees relating to design, planning and other professional fees can range from 8-10% for straightforward sites to 20% for the most complex. The Council's VA allows for a higher percentage (12%) on the smallest of sites (10 units or less), but only 6% for the Garden Community sites. We consider this figure to be far too low, particularly as these sites are likely to be more complex than straightforward.
64. The build out rate and sales of dwellings would naturally be slower in the early stages of the development, as reflected in the housing trajectory, which has been amended by the Council since the VA was prepared. Combined with slow early delivery rates, there would be in the early years, disproportionately high infrastructure costs. Therefore, we are concerned that the cost of interest from borrowing and particularly peak debt has not been factored in at an appropriate level.
65. Table 5.4 of the VA shows viability results for 10,000 units across a range of scenarios. We are concerned that in the scenario with £50,000 of infrastructure cost per dwelling, where only 95% of the market value is achieved on the sale of the houses, there is very marginal viability. This scenario is a real possibility given the amount of infrastructure that would need to be funded, including the RTS and the fact that the spatial strategy would see three Garden Communities delivering dwellings during a similar timeframe and so competing for house sales.

¹ Document referred to at the hearings, published by The Local Housing Delivery Group

66. The VA at paragraph 5.20 advises that *'this scheme delivers housing over a long trajectory (38 years) and is very sensitive to changes of phasing. Small amendments to the timing of infrastructure items or delivery of residential units as well as to the housing density or mix can make a significant difference to the results. A developer would be able to maximise these factors to the advantage of economic viability and we do not consider that these marginal results would render a study undeliverable'*.
67. We have reservations that some of these 'amendments' may not be in the gift of the developer and housing density and mix, for example, may be controlled by a Local Plan Policy. Also, this scenario could lead to an erosion of some of the key principles of Garden Communities set out in Policy S5, such as the provision of mixed tenure homes and housing types that are genuinely affordable for everyone; beautifully and imaginatively designed homes with gardens; development that enhances the natural environment, providing a comprehensive green infrastructure network and net biodiversity gains and using zero-carbon and energy-positive technology to ensure climate resilience; and integrated and accessible transport systems, within walking cycling and public transport designed to be the most attractive forms of local transport.
68. Given these findings in relation to the long development timescales and the need to ensure that these large scale sites would deliver homes not only in the early years of the plan but for many years to come, in a policy compliant manner, we consider that a revised VA based on the residual valuation appraisal method would need to be supplemented with a discounted cashflow assessment (a valuation method used to estimate the value of an investment based on its future cash flows), in order to provide a more complete and robust analysis.
69. To summarise, the scale of funding necessary and whether the Garden Communities could support such costs is uncertain. For these reasons it has not been adequately demonstrated that the Garden Communities proposed in the plan are financially viable and therefore developable.

Proposed Garden Communities in Detail

North Uttlesford

70. North Uttlesford is in the north west of the District, adjoining the boundary with South Cambridgeshire and is identified in Policy SP7 for 5000 new homes. It is recognised in the plan as being an area of high landscape and visual sensitivity, given its steeply sloping landform and elevated position with open fields and limited vegetation. It is also accepted that the development of the site has the potential to harm the significance of heritage assets on the site, and in the wider area.
71. The Framework at paragraph 126, is clear that Local Plans should set out a positive strategy that recognises that heritage assets are an irreplaceable resource and conserves them in a manner appropriate to their significance. In developing this strategy, local planning authorities should take into account the desirability of sustaining and enhancing the significance of

heritage assets.

72. The HIA finds that North Uttlesford is situated within a sensitive landscape with significant highly sensitive areas and contains extensive heritage assets, comprising built heritage as well as, known and unknown archaeology. It identifies as highly sensitive the immediate setting of the Roman Temple Scheduled Monument which is within the site allocation and the visual and historic relationship to the Roman Fort Scheduled Monument at nearby Great Chesterford.
73. Paragraph 132 of the Framework recognises that Scheduled Monuments are of the highest significance and substantial harm or loss of them should be wholly exceptional. The HIA also highlights that there is evidence of significant buried archaeology on the site and in the wider area which contains evidence of human occupation from the Palaeolithic period onwards. There are other heritage assets nearby including listed buildings and several Conservation Areas.
74. The site promoter's illustrative masterplan indicates that around 42% of the site area would be developed, with 54% remaining for green infrastructure, agricultural land or outdoor recreation. We also note that the Council anticipates around a 50:50 split between developable land and open space.
75. Nevertheless, Historic England maintain an in-principle objection to the development at North Uttlesford due to the potential impact on the highly sensitive historic environment and consider that an alternative location should be sought for the development.
76. The Roman Temple complex consists of below ground archaeological remains and is a Scheduled Monument. It is set away from the Roman Town, but is significantly associated with it, both by function and by physical links in the form of Roman roads. The HIA finds that views between the Roman Town and the Roman Temple and the Great Chesterton Conservation Area make a major positive contribution to its significance.
77. This area is identified as being of high sensitivity in the HIA. Despite the retention of open areas within the site, given its scale, the proposed Garden Community would introduce major change to the setting of the Roman Temple that would be likely to affect its relationship with the Roman Town and the wider landscape. Paragraph 132 of the Framework indicates that *'significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting'*.
78. Historic England advises that the geographical and topographical location of Great Chesterford on the north west boundary of Essex in the Cam valley, at the entrance to the Fens in a gap in the chalk hills is one of its important defining attributes in terms of its archaeological significance. The HIA is clear that the area surrounding and within the site is rich in archaeology.
79. The HIA considers that the extent of the archaeology already identified at the site and nearby points to the possibility of a wider distribution of remains across the site. It also refers to previous excavations of remains

on and around the site as well as chance finds. The Brief Archaeological Impact Assessment of the Proposed Uttlesford Garden Communities July 2018 Place Services (Document 1000.1 HEN) indicates that extensive archaeological deposits of multi-period date are likely to survive here.

80. The Historic Environment Record identifies a number of pre-historic sites in the form of Bronze and Iron Age burial sites. It also refers to the possibility of Roman structures and burials bordering the route between the Roman temple and the Roman town (which runs through the site) and evidence of an Anglo-Saxon burial ground and the presence of both pre-historic and Roman settlement.
81. This being so, based on current knowledge, it seems highly likely that there are remains of significance within the site. Accordingly, the proposed development has the potential to cause harm through the loss of important and extensive heritage information and of the opportunity for increased understanding of the history and development of the area, even assuming around 50% would be undeveloped.
82. The HIA further recognises that the significant buried archaeology on the site may further add to the understanding and significance of the area and the inter-relationships between the other heritage assets on the site and nearby. As such, the evidence base on this matter is currently inadequate. Further archaeological investigations would need to be undertaken to establish the likely scale and significance of archaeological remains on the site.
83. Presently, the proposed Garden Community at North Uttlesford is not justified by the historic heritage evidence available and we share Historic England's views that there is a possibility that it is not a suitable location for the development proposed due to its impact on the significance of heritage assets. Also, as set out earlier in our letter, the SA was carried out in advance of the HIA, which in this case is a concern given the findings of the HIA.
84. The Council's Landscape and Visual Assessment (Chris Blandford Associates June 2017) finds that the landscape sensitivity to a new settlement here would be high, given the open hill slopes and topography of the site. The landscape means that the upper ground on the site is highly visible from a considerable distance. Historic England are also concerned about development on the higher ground in terms of its impact on heritage assets.
85. Having visited the site and viewed the indicative masterplan we are also sceptical as to how development on the high ground including the sensitive upper valleys and ridges could in practice be avoided if the quantum of development proposed, as well as the other necessary facilities that would make it a sustainable community, were to be provided. This issue also has the potential to affect the capacity of the site for development and consequently viability. In light of these matters, it is our view that North Uttlesford is not currently justified due to the harm that would be caused to the landscape and to the significance of heritage assets.

86. Turning to highway matters, the supporting text to Policy SP7 states that developer funded highway improvements could accommodate up to 3,300 new homes at North Uttlesford. The Council indicates that these highway improvements would be in the A505 corridor to provide additional capacity. The Council recognises that additional transport improvements would be required in the A505 corridor to accommodate the further housing provision at North Uttlesford.
87. The revised text set out in ED70 (and to be introduced as a main modification) indicates that *'the proposed developer funded highway improvements could accommodate up to 3,300 new homes at North Uttlesford' and that 'development beyond that would depend on strategic capacity improvements on the A505 corridor'*. It adds, *'it is proposed that beyond the end of the plan period, a cap of 3,300 new homes is placed on any the allocation at North Uttlesford Garden Community to ensure that development over this figure does not take place until strategic improvements have been implemented'*.
88. However, the Council's response to representations made as part of the targeted consultation exercise that took place after the hearings, in Document ED72 (pages 21 and 29) suggests that transport modelling has identified that the interim junction improvements would accommodate a development of up to only 2,700 dwellings. There appears to be some ambiguity here that would require clarification.
89. The A505 Corridor Study is being prepared and led by Cambridgeshire County Council. Whilst the Council have indicated that the study is due to be commenced shortly (Matter 8 Hearing Statement) no clear timelines or funding for this piece of work have been provided. As things stand it is not clear to us what improvements would be required to deliver more than 2,700 or 3,300 homes at North Uttlesford, what they would cost, and when they might happen. ED70 suggests that a funded strategic scheme (strategic capacity improvements) is anticipated towards the end of the plan period, by year 14 (2031/32). However, it also seeks to put in place a contingency to deal with any delay in that strategic scheme coming forward.
90. This does not inspire confidence and leads to a good deal of uncertainty. The Council advises in response to the targeted representations, that it has identified specific schemes to address transport impacts in Cambridgeshire if no strategic scheme were available. However, the details of such schemes do not appear to be before us. The possible lack of a strategic scheme to address capacity on the A505 and the potential inability of the site at North Uttlesford to grow beyond 2,700 or 3,300 homes would be likely to have a significant effect on the overall masterplan for this Garden Community and what could be provided there. It would also have further implications for, amongst other things, viability.
91. Additionally, we are conscious that not only is the production of the A505 Corridor Study largely outside of the Council's control, but also that cross boundary highway and other transport matters and improvements affecting

North Uttlesford are reliant on Cambridgeshire County Council, South Cambridgeshire District Council, Greater Cambridge Partnership or Cambridgeshire and Peterborough Combined Authority. However, notwithstanding the Position Statement from Cambridgeshire County Council, these partners are not signatories to any SoCG provided to this examination. As such, we cannot be assured that they agree and are committed to the necessary infrastructure for North Uttlesford Garden Community.

92. Aside from these points, we have serious doubts whether in the absence of a RTS and considering the train station capacity issues at Whittlesford Parkway Station we heard about at the hearings, the transport measures proposed at North Uttlesford are truly sustainable and in line with Garden Community principles.
93. We are also concerned about the apparent lack of bus provision/links to Saffron Walden and other locations listed in Policy SP7 alongside the focus on bus links to employment opportunities and train stations. This is not included in the IDP update (only a footpath and bicycle route are identified). In this context we question whether the IDP would deliver the aims of Policy SP7 to provide a package of measures to provide transport choice at North Uttlesford, including the delivery of high quality, frequent, and fast public transport services to Saffron Walden (and other destinations).
94. Finally, we are aware that the planning application for the proposed development at the Wellcome Genome Campus site, has recently been granted permission for a significant scheme. That could have ramifications for this plan and in particular the North Uttlesford Garden Community site allocation. Therefore, further work would need to be undertaken to understand the cumulative impacts of that development alongside North Uttlesford on transport in the immediate and wider road network and on rail station capacity.

Easton Park

95. Easton Park is a greenfield site between Great Dunmow and Stansted Airport. Policy SP6 anticipates a new Garden Community of 10,000 homes. The Council accepts that the site contains a number of constraints such as landscape and heritage features, including ancient woodland, scheduled monuments, Easton Lodge Registered Park and Garden, a number of listed buildings and that it is adjacent to the Little Easton Conservation Area.
96. The HIA finds the site to be in an area of moderate to high sensitivity and concludes that Easton Park has the potential to harm the significance of heritage assets. It identifies a number of areas within the site as having a high sensitivity. Notably, these include the northern section of the site around the Registered Park and Garden and Little Easton Conservation Area where there are views into and out of the site.
97. Historic England considers that the HIA, through its sensitivity testing, effectively identifies a reduced developable area at Easton Park and accordingly objects to any development within the site, north of Park Road.

Despite this, the Council anticipates that there is scope for some appropriately sensitive development on this part of the site (Matter 8 Hearing Statement).

98. We also note that this part of the site is shown to accommodate buildings on the site promoter's masterplan. Again, having visited the site and considered the evidence before us, we share Historic England's view that the sensitivity of the historic environment has not been adequately considered by the Council and we conclude that unless evidence is produced to show that it could be acceptably developed, development should not take place within this part of the site. Consideration would need to be given to what implications this has for the capacity of the site and its viability.
99. In addition, the HIA fails to consider the historic asset of Stone Hall (a Grade II* listed building) to the south of the site which was not accessible at the time of the survey. Historic England notes that Stone Hall responds to a wider rural setting which contributes to its setting. This is a serious omission that undermines the reliability of the HIA and would need to be re-considered.
100. Regarding transport and infrastructure matters, we understand that a committed interim improvement scheme at junction 8 of the M11 is being progressed by Essex County Council. The modelling analysis that has been undertaken suggests there is sufficient capacity to accommodate traffic growth up to a point between 2025 and 2030. However, it seems highly likely that further infrastructure improvements would be required at Junction 8 at some stage in the future.
101. Highways England are currently in the process of investigating strategic interventions to Junction 8 (and to the M11 between Junction 8 and 13) to help determine spending within the Department for Transport's next Road Investment Strategy. Given the potential for this to delay development at Easton Park more clarity would be needed as to when the outcome of these investigations will be known and as to the likelihood of the funding being available.
102. As set out in the transport and infrastructure section of this letter, more information would be required to support the RTS. In relation to Easton Park ED13 suggests the RTS should be given exclusive use of sections of the B1256 Great Dunmow bypass. We share the concerns raised by a number of representors as to how this would work in practice and whether it would have the effect of forcing traffic to use the High Street and thus reversing the benefits of the bypass.
103. ED65 proposes a main modification to determine, among other things, the issue of what further land may be required to deliver the RTS at Easton Park. This indicates a large area of land to the north west of the Garden Community for transport linkages. It is based on a plan provided by the Easton Park promoter in ED66 to show an area within which third party land may be required to provide linkages. The amount of land identified for this purpose is considerable and adds to our concerns outlined above under

the Transport and Infrastructure heading in relation to the land requirements/assembly issues and costs associated with the RTS and its consequent viability.

104. Also, the presence of an underground high-pressure gas pipeline crossing the site has recently come to light. Document ED75 proposes a main modification to Policy SP6 to reflect this situation. However, it has not been established what implications arise from the pipeline and its associated easements/restrictions (as described in ED75) in terms of the masterplan for Easton Park including any effect that it may have on the capacity of the site to accommodate development. This work would need to be undertaken.

West of Braintree

105. West of Braintree straddles the boundary with neighbouring Braintree District Council and would form part of a wider proposed Garden Community which is being advanced through the North Essex Authorities (NEA) local plan. That plan is also currently being examined. Policy SP8 of the Uttlesford plan indicates that the overall new Garden Community at West of Braintree would create a new community of 10,500 – 13,500 homes, up to 3,500 of which would be in Uttlesford.
106. During the hearings, the Council sought to reduce the number of dwellings that this allocation would deliver during the plan period by 330, from 970 to 640. It is accepted by the Council that the Uttlesford part of the wider Garden Community is wholly dependent on the Braintree element of it going ahead because the size of the Uttlesford part of the Garden Community would not be sufficient to deliver a Garden Community. The Council's addendum of focussed changes recognises the elevated risk around the delivery of the Uttlesford part of West of Braintree as a result of the initial findings of the NEA Local Plan Inspector in his letter of June 2018.
107. In this context, whilst our role is to examine the soundness and legal compliance of the Uttlesford plan and the proposed allocations within that area only, given that it is not a standalone proposal, it is vital that the Uttlesford plan's assessment of West of Braintree's sustainability and viability should be undertaken on the basis of the whole Garden Community (i.e. also including that part of it within Braintree District).
108. The examination of the NEA plan is ongoing. Whilst documents (ED47-47K) were submitted to this examination during the hearing sessions, they were prepared for the NEA examination, and are for that examining Inspector to consider in the first instance. The NEA Inspector has yet to conclude whether the West of Braintree allocation in that plan is sound. As the Council has recognised in its suggested main modifications, his findings will have ramifications for the housing strategy and numbers in this plan.

Objectively Assessed Need for Housing Land

109. Examination document ED32 is a response to our request at the hearings that the Council consider a Main Modification to SP3 to make it clear that 504 dwellings of the housing requirement relates to bed spaces in

communal establishments. The proposed main modification to Policy SP3 does this, however, there is another issue. The calculation of the housing requirement of 14,000 dwellings will have double-counted the 504 people who live in communal establishments. They will have been included already within the census data which provided the starting point for the OAN figure, but it seems they were also identified and added on again between the Regulation 18 and Regulation 19 consultations.

110. If the housing requirement figure is lower, this would affect the other housing calculations, such as the 5-year housing land supply (HLS) and require other consequential main modifications too.

Hatfield Forest Site of Special Scientific Interest (SSSI)

111. There are objections from Natural England to the plan arising from a lack of mitigation measures to address recreational impacts of development in the district and, in particular, of the proposed Garden Community at Easton Park, upon Hatfield Forest SSSI. We share their concerns but are aware that the Council is working with The National Trust, Natural England and neighbouring Council's which fall within the zone of influence of this SSSI, on a mitigation strategy. This matter would also need satisfactorily resolving.

Overall Conclusions

112. We are very conscious of the considerable work that has been undertaken over several years by the Council and the promoters of the Garden Communities in developing them as proposals. We are also aware of the in-principle support afforded to them as a concept by the Government and the funding that has been provided. However, for the reasons given, the Garden Communities are insufficiently justified and have not been shown to have a reasonable prospect of being delivered as submitted. Moreover, the unsolicited documents referred to in paragraph 4 above do not deal with these matters.
113. Consequently, as things stand the strategy set out in the plan is unsound.

In summary, our main concerns are:

- The lack of clear mechanisms to ensure the Garden Community Principles will be met;
- The need to define precise boundaries and to show these on the policies map;
- The proposed housing delivery trajectory is overly optimistic;
- There is unlikely to be a 5 year HLS on adoption;
- The stepped trajectory unreasonably delays addressing the housing affordability problem;
- The Garden Community approach predetermines the strategy long beyond the plan period and so is unduly inflexible;
- As part of the assessment of reasonable alternatives the SA does not consider a smaller number of garden communities, in combination with more housing in existing sustainable settlements, nor does it have regard to the evidence in the HIA;

- The lack of certainty about the delivery of employment uses undermines the potential for the Garden Communities to be sustainable places;
- The costs, viability and deliverability of the RTS are uncertain and any benefits would be realised too late to help ensure the Garden Communities at Easton Park and West of Braintree would be sustainable places;
- Realistic infrastructure costs have not been established meaning it is uncertain whether the Garden Communities will be viable and developable;
- The North Uttlesford Garden Community is flawed in terms of landscape and heritage impacts and the potential for the A505 improvements and public transport infrastructure are uncertain, undermining the potential for this Garden Community to be a sustainable place;
- The Easton Park Garden Community is flawed in terms of heritage impacts, the potential for highway improvements to M11 junction 8 and the M11 between junctions 8 and 13 are uncertain pending further investigations by Highways England and the unknown implications of the gas pipeline crossing the site on its capacity for built development;
- The West of Braintree Garden Community is flawed since the sustainability appraisal and viability assessment only considers the part of the site within Uttlesford despite it being dependent of the delivery of the larger proposed site allocation in Braintree District.

In addition, further work would be needed on:

- Mitigation measures for Hatfield Forest Site SSSI;
- The housing requirement and trajectory in relation to people in communal establishments.

114. In order to arrive at a sound strategy, we consider that as a primary consideration, the Council would need to allocate more small and medium sized sites that could deliver homes in the short to medium term and help to bolster the 5 year HLS, until the Garden Communities begin to deliver housing. This would have the benefit of providing flexibility and choice in the market and the earlier provision of more affordable housing. It would also create a buffer, so the target of 14,000 homes is not only just being met by a narrow margin and would allow for a less steeply stepped housing trajectory.

115. Hand in hand with this approach, our view is that the Council should delete one of the Garden Communities from the plan. Our suggestion would be that this should be North Uttlesford, which for the reasons set out above, seems to have the most barriers to its development and perform the least well against the Garden Community Principles. As well as realising the benefits associated with the provision of a wider range of sites described above, to do so would realistically acknowledge and address the enormity of the scale of the highly ambitious task of delivering three Garden Communities in the district at once. It would also reduce the post plan period development by around 3000 dwellings, thus providing the potential

for a variety of small and medium sized sites to be allocated in the next local plan period, if appropriate.

116. We must stress however that in suggesting this course of action we are not endorsing the other Garden Communities in the plan. Our identified concerns in relation to the significant issues to overcome at Easton Park and West of Braintree remain and an enormous amount of further work would be required, as outlined above, to justify these ambitious allocations.

Next Steps

117. In our approach to the examination we have given great weight to the guidance to Inspectors on the examination of local plans in Greg Clark's letter to the Chief Executive of the Planning Inspectorate of 21 July 2015 (as recently restated in James Brokenshire's letter of 18 June 2019). At the same time, the recently updated Procedure Guide for Local Plan Examinations makes clear (third bullet point of paragraph 8) that one of the three possible outcomes for an examination is that there are soundness problems with a plan which it is not possible to address by main modifications and that, in advance of a formal recommendation of non-adoption, Councils would be asked to consider withdrawing the plan.
118. We must examine the plan against the soundness tests set out in the Framework and determine whether it is justified and effective. The points covered above are fundamental matters which relate to the soundness of the plan.
119. To address our concerns, the Council would have to prepare a very considerable amount of new evidence. Since the plan was submitted in January 2019 much new evidence and information to support it has already been produced and continues to be submitted. Although we accept that some of this has been at our request, that is not so in all cases.
120. During the course of the examination, so far the Council has sought to amend and justify significant strategic elements of the plan including: revised start dates for the Garden Communities; different housing numbers within the plan period; a revised trajectory; altered methodology for calculation of 5 year supply; detailed changes to Garden Communities policy wording arising from late Statements of Common Ground with key partners and statutory consultees; late emergence of transport RTS/BRT details; Hatfield SSSI draft Mitigation Strategy; a sports strategy; an updated IDP; and the need for additional targeted consultation after the hearings sessions which has lengthened timescales and added another layer of complexity to the process.
121. Documents, including an updated IDP (October 2019), continue to be submitted without the opportunity for participants to comment. To some degree, these are evidence base documents which should have informed the plan making process. As things stand, there are some 81 items in the Examination Documents library that have been submitted following the submission of the plan (and this number continues to grow). We fully appreciate the long timescales involved in the local plan process and understand that things move on.

122. Nevertheless, we share the views of a number of the participants in the examination that it is difficult to keep track of and understand the large volume of additional material that has been submitted and continues to emerge. This is especially problematic for local residents. There is also a risk that this additional material, and any further evidence that is produced, seeks to justify the strategy set out in the plan rather than informing the plan making process which is how it should be used.
123. Proceeding with this examination is likely to become protracted. It would be procedurally challenging to manage in practical terms and extremely difficult for participants to engage with. There is also no guarantee that this plan would be found sound at the end of that long and complex process.
124. We estimate it would take between 1 and 2 years, possibly longer, to complete the necessary work and that would include work which is normally undertaken as part of the plan preparation process, and to consult upon it. Also, any lengthy pause in the examination is likely to lead to the need to revisit the objectively assessed need for housing (OAN). The OAN for Uttlesford is based on the Strategic Housing Market (SHMA) update 2017 which in turn is based on the 2014-based household projections. If new national household projections were to be published, it would be necessary for this examination to consider whether the change was meaningful, in line with the advice in the Guidance. Other parts of the evidence base could also become out of date during this time. All this additional work and any changes the LPA considers necessary to the plan would need to be consulted upon and further hearings held.
125. Moreover, we consider that the work likely to be necessary goes well beyond what could be reasonably addressed by main modifications to the plan. The Council has already suggested a considerable number of main modifications and additional modifications to the plan (around 120 MMs and a similar number of AMs at 14 October 2019). These include amongst other things changes to the housing numbers in the Garden Communities, the altered housing trajectory, a suggested additional policy, a new Garden Community Inset Plan and the inclusion of employment figures for the Garden Communities. With the further work that is necessary the number of main modifications would be very likely to become much greater still.
126. As you will be aware, the examination process is not intended to allow the Council to carry out major changes to the plan or to complete the preparation of its evidence base. Based on our concerns about the soundness of the plan set out above we anticipate that the changes necessary would amount its almost complete re-drafting. The Guidance advises that where the changes recommended by Inspectors would be so extensive as to require the virtual rewriting of the plan, it is likely to be suggested that the local planning authority withdraw the plan.
127. We believe that the key decisions to be made on the future of the Garden Communities and the spatial strategy need to be taken by the Council, in consultation with local residents. The most effective and transparent way

to do this would be through the preparation of a new plan, based on a robust SA, rather than emerging as our recommendations in main modifications.

128. We realise that the Council's preference might be to continue with the examination if at all possible and, although we will not reach a final decision on the way forward until we have had the opportunity to consider the Councils' response to this letter, we are of the view that withdrawal of the plan from examination is likely to be the most appropriate option.
129. We appreciate that this will be not be the news the Council were hoping for and that you may need some time to reflect on the contents of this letter and to determine the preferred course of action. We are not setting a deadline for a response from the Council, but an early indication of when the Council is likely to be able to provide a response would be appreciated.
130. We are not seeking a response to this letter from any other parties and will not receive any comments on it. Nevertheless, we are happy to provide any necessary clarification to the Council via the Programme Officer.

Louise Crosby and Elaine Worthington

Examining Inspectors

Bassetlaw District Council - Conservation

(Pages 96 - 97)

From: [Michael Tagg](#)
To: [Will Wilson](#)
Subject: RE: Blyth Neighbourhood Plan: Consultation on Updated Submission Documents
Date: 22 January 2020 14:51:44

Hi Will, no comments from Conservation.

Regards, Michael

Michael S. A. Tagg BA (Hons) MSc

Acting Conservation Manager

Planning Services

Bassetlaw District Council

Queens Buildings

Potter Street

Worksop

Nottinghamshire

S80 2AH

Tel: 01909 533427

You will appreciate that the above comments are made at officer level only and do not prejudice any decision taken at a later date by the Council.



The Consultation on the Draft Bassetlaw Plan will be running from
15/01/2020 till 26/02/2020

Find out more information on our website www.bassetlaw.gov/bassetlawplan

The graphic features a circular map of the Bassetlaw area with various colored lines representing roads or boundaries. The text is enclosed in a dashed rectangular border.

Canal and River Trust

(Pages 98 - 99)

From: [Simon Tucker](#)
To: [Will Wilson](#)
Subject: RE: Blyth Neighbourhood Plan: Consultation on Updated Submission Documents
Date: 27 January 2020 13:37:15
Attachments: [image001.png](#)

FAO Mr Wilson

Thank you for your consultation on the Blyth Neighbourhood Plan.

Having reviewed the location of the area covered by the plan and its relationship to our network we can confirm that the Canal & River Trust do not wish to make comments in relation to the plan.

Kind Regards

Simon Tucker MSc MRTPI

Area Planner North East, Canal and River Trust

T 07885241223

E simon.tucker@canalrivertrust.org.uk

Canal & River Trust

Fearn's Wharf; Neptune Street; Leeds; LS9 8PB

www.canalrivertrust.org.uk

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Please visit our website to find out more about the Canal & River Trust and download our 'Shaping our Future' document on the About Us page.



Coal Authority

(Pages 100 - 101)



The Coal
Authority

Resolving the impacts of mining

Coal Authority
200 Lichfield Lane
Mansfield
Nottinghamshire
NG18 4RG

T 0345 762 6848
T +44(0)1623 637000
www.gov.uk/coalauthority

Neighbourhood Planning Team
Bassetlaw District Council

BY EMAIL ONLY: will.wilson@bassetlaw.gov.uk

23 January 2020

Dear Mr Wilson

Blyth Neighbourhood Plan

Thank you for the notification of the 22 January 2020 seeking the further views of the Coal Authority on the above Neighbourhood Development Plan.

We previously commented on this Neighbourhood Plan in a letter to the LPA dated 23 September 2019. I have reviewed the additional information and can confirm that we have no further comments to make.

Yours sincerely

Melanie Lindsley

Melanie Lindsley *BA (Hons), DipEH, DipURP, MA, PGCertUD, PGCertSP, MRTPI*
Development Team Leader (Planning)

T 01623 637 164

E planningconsultation@coal.gov.uk

Highways England

(Pages 102 - 104)

Our ref:
Your ref:

Neighbourhood Planning
Bassetlaw District Council
Queen's Buildings
Potter Street
Worksop
S80 2AH
Via Email:
neighbourhoodplanning@bassetlaw.gov.uk

Steve Freek
Highways England (Area 7)
Stirling House
Lakeside Court
Osier Drive
Sherwood Business Park
Nottingham
NG15 0DS

Direct Line: 0300 470 4457

28 February 2020

Dear Sir/Madam,

Consultation on Updated Submission Documents: Blyth Neighbourhood Plan

Highways England welcomes the opportunity to provide comments on the updated submission documents that relate to the Blyth Neighbourhood Plan, which covers the period of 2018 to 2035.

Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth. In relation to the Blyth Neighbourhood Plan, Highways England's principal interest is in safeguarding the A1 which routes through the Plan area.

We provided comments through consultation on the submission version of the Neighbourhood Plan in September 2019, noting a proposed housing site allocation located adjacent to the A1 at land to the east of Spital Road with the potential for 53 dwellings. We advised that should this land be promoted for development it should be supported by a Transport Assessment through the development management process, investigating the implications along the shared boundary with the A1 and potential traffic impacts in order to safeguard the operation of the SRN in the area.

We note that this site remains in the Site Allocation Assessment Report (reference BDC03), though it is stated as having the potential to deliver 86 dwellings. While we support the allocation in principle our position with regard to this site remains as above.

Further, any site allocated for development which abuts the SRN boundary shall need to demonstrate that the structural integrity of the network will not be compromised by investigating the need for boundary treatment works, as well as showing that the surface water drainage strategy for the site will not connect to Highways England's network.

From review of the updated submission documents, we do not consider there to be any material changes with regard to the potential implications on the SRN. We therefore have no further comments to provide and trust the above is useful in the progression of the Blyth Neighbourhood Plan.

Yours sincerely,

S Freek

Steve Freek
Midlands Operations Directorate
Email: Steve.Freek@highwaysengland.co.uk

Historic England

(Pages 105 - 106)

From: eleanor.clifford@historicengland.org.uk
To: [Will Wilson](#)
Subject: Historic England advice on case PL00551843
Date: 29 January 2020 11:26:40

Dear Mr Wilson

I am writing in relation to the following:

NDP: Neighbourhood Development Plan
BLYTH NEIGHBOURHOOD PLAN, NOTTINGHAMSHIRE
[Case Ref. PL00551843; HE File Ref. H/DP55345; Your Reference. BlythNP]

Historic England has no further comments to make and I refer you to our previous letter of 28/02/2019.

Yours Sincerely

Eleanor Clifford on behalf of Clive Fletcher
Business Officer
E-mail: eleanor.clifford@historicengland.org.uk
Direct Dial: 0121 625 6864

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Max Design

(Pages 107 - 109)

From: [Paul Watson](#)
To: [Will Wilson](#); [Will Wilson](#)
Cc: ant_reed@hotmail.co.uk; [Mandy Freeman](#); [Max Jones](#)
Subject: Re: 1891 - Blyth
Date: 14 February 2020 12:10:45

Hi Will,

Thank you for the call and the above email confirming that the examiner's report is back in the 2nd week of March.

I note that the consultation period is Tuesday 21 January 2020 and closes at 1700 on Monday 2 March 2020. So I would like to formally ask that our site can be put forward for inclusion in the plan. I've cc'd neighbourhoodplanning@bassetlaw.gov.uk into this email for their action.

Kind regards

Paul Watson

Chartered Architectural Technologist



T: 01302 867509
paul@maxdesignconsultancy.co.uk
maxdesignconsultancy.co.uk

Architecture | Planning | Consultancy

[The White House](#)

[278 Bawtry Road](#)

[Doncaster](#)

[DN4 7PD](#)

Sat Nav: DN4 7NX

On Fri, 14 Feb 2020 at 10:24, Will Wilson <Will.Wilson@bassetlaw.gov.uk> wrote:

Hi Paul,

Further to our discussion, I've just realised I've relayed incorrect information about the Blyth Neighbourhood Plan.

The Blyth NP is currently under examination, but it will be a little longer before we receive the report, due to a current consultation on technical documents (it's another NP that we are due to receive the Examiner's Report back for next week; lots on at this end at the minute!).

In spite of the above, all of the documents relating to Blyth are available to consult on our website:

The Submission NP (as currently being examined):

<https://www.bassetlaw.gov.uk/media/4755/blyth-neighbourhood-plan-submission-version.pdf>

The page holding the above and all other documents related to the Blyth NP:

<https://www.bassetlaw.gov.uk/planning-and-building/planning-services/neighbourhood-plans/all-neighbourhood-plans-in-bassetlaw/blyth/>

Hope that the above proves helpful; if you have any queries I am happy to discuss. As discussed, I will let you know once we have the Examiner's report back - likely in the 2nd week of March.

Kind regards,

Will

Will Wilson PhD AssocRTPI

Interim Lead Neighbourhood Planner

T: 01909 533 495



BLOCK PLAN 1:500



SITE LOC. PLAN 1:1250

MaxDesign			
Architecture Planning Consultancy			
The White House, 278 Bawtry Road, Doncaster DN4 7PD			
t: 01302 867509		m: 07734 939 044	
e: design@maxdesignconsultancy.co.uk		w: maxdesignconsultancy.co.uk	
status:			
PLANNING			
client:			
A REED			
project:			
BLYTH			
title:			
OVERALL SITE LOCATION PLAN			
scale:		date:	
1:500 & 1:1250@A1		JUL 19	
project no.:	drawn:	number:	rev:
1891	ZY	005	

Natural England

(Pages 110 - 111)

Date: 04 February 2020
Our ref: 306594
Your ref: None



Will Wilson
neighbourhoodplanning@bassetlaw.gov.uk

Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

BY EMAIL ONLY

Dear Dr Wilson

Planning consultation: Blyth Neighbourhood Plan: Consultation on Updated Submission Documents

Thank you for your consultation on the above dated 21 January 2020 which was received by Natural England on 22 January 2020

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England acknowledges receipt of Blyth Neighbourhood Plan - Updated submission documents:

- SEA / HRA Screening Report: new document, previously omitted from the submission.
- Basic Conditions Statement: minor amendments (section 2.15 and Appendix 1) to reference the SEA / HRA Screening Report (as above).
- Site Assessment Report: correction of errors in the performance tables for sites NP07 (pp 29 - 31) and NP08 (pp 32 - 34).
- Consultation Statement (List of Regulation 14 Comments, Responses and Changes): new supplement to the previous Consultation Statement.

Natural England has no further comments to make further to our response dated 16 January 2020.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter only please contact Sandra Close on 020 8026 0676. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours sincerely

SANDRA CLOSE

Planning Adviser
East Midlands Team

Nottinghamshire County Council – Highways
(Pages 112 - 113)

From: [Martin Green](#)
To: [Will Wilson](#)
Subject: FW: Blyth Neighbourhood Plan: Consultation on Updated Submission Documents
Date: 22 January 2020 06:37:07

Dear Sirs

I can confirm that the Highway Authority has no comments on the updated information.

Yours faithfully

Martin Green

Principal Officer

Nottinghamshire County Council

Telephone 0115 9773963

www.nottinghamshire.gov.uk

Nottinghamshire County Council – Planning Policy

(Pages 114 - 115)

From: [Emma Brook](#)
To: [Will Wilson](#)
Subject: Blyth Neighbourhood Plan: Consultation in updated submission document
Date: 28 January 2020 13:56:27

Good afternoon,

Thank you for consulting the planning policy team at Nottinghamshire County Council on the updated submission documents for the Blyth Neighbourhood Plan. At present, the County Council does not have any further comments to make on these updated documents.

Please do not hesitate to contact me if you have any questions,

Many thanks,

Emma Brook

Planning Policy Team

Place Department

Nottinghamshire County Council

County Hall

Nottingham

NG2 7QP

Telephone: 0115 977 3097

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Severn Trent Water

(Pages 116 - 119)

25 February 2020

Our ref: Blyth 3

Dear Sir/Madam

Blyth Strategic Environmental Assessment and Habitat Regulations Assessment Screening

Thank you for the opportunity to comment on your consultation, we have no objections to the general principles and content of the Strategic Environment Assessment and Habitat Regulations Assessment Screening.

We would however like to highlight a number of points that need to be considered when considering development within this area.

Blyth is sited within Source Protection Zone (SPZ) 3, from which 25 boreholes are currently abstracting, it is therefore important that development does not adversely impact on the SPZ.

SPZ 3 refers to the total catchment – defined as the area around a source within which all groundwater recharge is presumed to be discharged to the source.

The scale and the significant distance from the proposed developments within Blyth to any of the surrounding boreholes, would suggest that the risk to groundwater assets is low.

Whilst we do not raise any objection to the proposed developments, we would however advise that development is carried out considerately, with a view to protecting the underlying Principle Aquifer Chester Formation (Triassic) (Sandstone, Pebbly (Gravelly)).

Principal Aquifers are defined by the Environment Agency as “layers of rock or drift deposits that have a high intergranular and/or fracture permeability – meaning they usually provide a high level of water storage. They may support water supply and/or river base flow on a strategic scale”.

To ensure the protection of the underlying aquifer we would recommend that all development is carried out in accordance with Industry Best Practice and EA guidelines are adopted, in particular that a suitable train of treatment be implemented when infiltration Sustainable Drainage Systems (SuDS) are designed.

See below for useful links for more information of SuDS:

- General SuDS information: https://www.susdrain.org/resources/SuDS_Manual.html
- Free download of SuDS manual: <https://www.ciria.org/ItemDetail?iProductCode=C753F&Category=FREEPUBS>

Please keep us informed when your plans are further developed when we will be able to offer more detailed comments and advice.

For your information we have set out some general guidelines that may be useful to you.

Position Statement

As a water company we have an obligation to provide water supplies and sewage treatment capacity for future development. It is important for us to work collaboratively with Local Planning Authorities to provide relevant assessments of the impacts of future developments. For outline proposals we are able to provide general comments. Once detailed developments and site specific locations are confirmed by local councils, we are able to provide more specific comments and modelling of the network if required. For most developments we do not foresee any particular issues. Where we consider there may be an issue we would discuss in further detail with the Local Planning Authority. We will complete any necessary improvements to provide additional capacity once we have sufficient confidence that a development will go ahead. We do this to avoid making investments on speculative developments to minimise customer bills.

Sewage Strategy

Once detailed plans are available and we have modelled the additional capacity, in areas where sufficient capacity is not currently available and we have sufficient confidence that developments will be built, we will complete necessary improvements to provide the capacity. We will ensure that our assets have no adverse effect on the environment and that we provide appropriate levels of treatment at each of our sewage treatment works.

Surface Water and Sewer Flooding

We expect surface water to be managed in line with the Government's Water Strategy, Future Water. The strategy sets out a vision for more effective management of surface water to deal with the dual pressures of climate change and housing development. Surface water needs to be managed sustainably. For new developments we would not expect surface water to be conveyed to our foul or combined sewage system and, where practicable, we support the removal of surface water already connected to foul or combined sewer.

We believe that greater emphasis needs to be paid to consequences of extreme rainfall. In the past, even outside of the flood plain, some properties have been built in natural drainage paths. We request that developers providing sewers on new developments should safely accommodate floods which exceed the design capacity of the sewers.

To encourage developers to consider sustainable drainage, Severn Trent currently offer a 100% discount on the sewerage infrastructure charge if there is no surface water connection and a 75% discount if there is a surface water connection via a sustainable drainage system. More details can be found on our website

<https://www.stwater.co.uk/building-and-developing/regulations-and-forms/application-forms-and-guidance/infrastructure-charges/>

Water Quality

Good quality river water and groundwater is vital for provision of good quality drinking water. We work closely with the Environment Agency and local farmers to ensure that water quality of supplies are not impacted by our or others operations. The Environment Agency's Source Protection Zone

(SPZ) and Safe Guarding Zone policy should provide guidance on development. Any proposals should take into account the principles of the Water Framework Directive and River Basin Management Plan for the Severn River basin unit as prepared by the Environment Agency.

Water Supply

When specific detail of planned development location and sizes are available a site specific assessment of the capacity of our water supply network could be made. Any assessment will involve carrying out a network analysis exercise to investigate any potential impacts.

We would not anticipate capacity problems within the urban areas of our network, any issues can be addressed through reinforcing our network. However, the ability to support significant development in the rural areas is likely to have a greater impact and require greater reinforcement to accommodate greater demands.

Water Efficiency

Part G of Building Regulations specify that new homes must consume no more than 125 litres of water per person per day. We recommend that you consider taking an approach of installing specifically designed water efficient fittings in all areas of the property rather than focus on the overall consumption of the property. This should help to achieve a lower overall consumption than the maximum volume specified in the Building Regulations.

We recommend that in all cases you consider:

- Single flush siphon toilet cistern and those with a flush volume of 4 litres.
- Showers designed to operate efficiently and with a maximum flow rate of 8 litres per minute.
- Hand wash basin taps with low flow rates of 4 litres or less.
- Water butts for external use in properties with gardens.

To further encourage developers to act sustainably Severn Trent currently offer a 100% discount on the clean water infrastructure charge if properties are built so consumption per person is 110 litres per person per day or less. More details can be found on our website

<https://www.stwater.co.uk/building-and-developing/regulations-and-forms/application-forms-and-guidance/infrastructure-charges/>

We would encourage you to impose the expectation on developers that properties are built to the optional requirement in Building Regulations of 110 litres of water per person per day.

We hope this information has been useful to you and we look forward in hearing from you in the near future.

Yours sincerely

Chris Bramley

Strategic Catchment Planner

growth.development@severntrent.co.uk

Sport England

(Pages 120 - 122)

From: [Planning Central](#)
To: [Will Wilson](#)
Subject: RE: Blyth Neighbourhood Plan: Consultation on Updated Submission Documents
Date: 23 January 2020 10:28:29

Thank you for consulting Sport England on the above neighbourhood plan.

Government planning policy, within the **National Planning Policy Framework** (NPPF), identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.

It is essential therefore that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 96 and 97. It is also important to be aware of Sport England's statutory consultee role in **protecting playing fields** and the presumption against the loss of playing field land. Sport England's playing fields policy is set out in our Playing Fields Policy and Guidance document.

<http://www.sportengland.org/playingfieldspolicy>

Sport England provides guidance on **developing planning policy** for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded.

<http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/>

Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 97 of the NPPF, this takes the form of **assessments of need and strategies for indoor and outdoor sports facilities**. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery.

Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work.

<http://www.sportengland.org/planningtoolsandguidance>

If **new or improved sports facilities** are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes.

<http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/>

Any **new housing** developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.

In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how **any new development**, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.

Active Design, which includes a model planning policy, provides ten principles to help ensure the design and

layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.

NPPF Section 8: <https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities>

PPG Health and wellbeing section: <https://www.gov.uk/guidance/health-and-wellbeing>

Sport England's Active Design Guidance: <https://www.sportengland.org/activedesign>

(Please note: this response relates to Sport England's planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.)

If you need any further advice, please do not hesitate to contact Sport England using the contact details below.

Yours sincerely,

Planning Administration Team

T: 020 7273 1777

E: planning.central@sportengland.org

Sport England



We are undefeatable



Sport Park, 3 Oakwood Drive, Loughborough, Leicester, LE11 3QF



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