

Bassetlaw Local Plan Green Gaps Report Addendum October 2020



Bassetlaw
DISTRICT COUNCIL
— North Nottinghamshire —

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1 INTRODUCTION

1.1 In 2019 Bassetlaw District Council commissioned Clive Keble Consulting and Carroll Planning+Design to undertake three studies to support the emerging Local Plan, these were:

- a review of the 2009 Bassetlaw Landscape Character Assessment;
- a (landscape based) Land Availability Assessment (of 27 sites); and
- a report on (eight) proposed Green Gaps.

1.2 The purpose of the Green Gaps report was to examine the wider context, establish a methodology and identify physical boundaries for each of the proposed Green Gaps and to justify why they are important. The intention of the Green Gaps was to enable the District Council to be able to use the new Local Plan to safeguard the characteristics of areas of “important landscape” around more sensitive locations where there has been pressure for development, including Worksop, Retford, Langold/Carlton and Harworth/Bircotes. It was necessary to ensure that the Green Gaps report was consistent with the recommendations in the Land Availability Assessment and the conclusions from the Review of the 2009 Landscape Character Assessment, substantive parts of which remain applicable.

1.3 The methodology recognised the need to set Green Gaps in a clear context, including:

- alignment with national policy and guidance;
- relevant recommendations/actions in the Natural England National Character Areas and the 2009 Bassetlaw Landscape Character Study;
- how Green Gaps fulfil Objectives/Policies in the 2011 Core Strategy (where still relevant);
- identify/assess how Neighbourhood Plans may provide a context for Green Gaps;
- consider the purpose of Green Gaps in relation to other policies and appropriate land uses;
- the basis for defining boundaries for and extent of Green Gaps;
- looking at comparable approaches in other Local Planning Authorities; and
- site visits/map based work to record location, current land use, neighbouring uses, topography, landscape, designations, notable views, recreational and habitat connectivity.

1.4 The Local Plan was subject to a formal public consultation in January/February 2020 and, arising from comments, further work was commissioned to:

- consider the comments received;
- update the national context and examples of the use of Green Gaps elsewhere;
- consider the potential impact of Covid-19 and emerging changes to planning practice;
- review/restate the purpose and intent of Green Gaps and the justification for them; and
- suggest wording for a separate Green Gaps policy (in the Draft Local Plan they were included in Policy ST34- Landscape Character).

1.5 The context for this additional work remains that the landscape and natural environment of Bassetlaw is the most readily appreciated feature of the district. This is influenced by the underlying geology, climate, habitats and human influence, past and present. There are no national statutory landscape designations, but approximately 98% of the district is rural and the distinctive and contrasting landscapes, which are highly valued, provide an attractive setting for towns and villages. There is good access to the wider region, which makes for a very desirable location. These circumstances generate significant pressures on the countryside. Through a range of policies, including Green Gaps, the emerging Local Plan has an important role to play in ensuring that new development does not undermine these fundamental assets.

2 CONSIDERATION OF COMMENTS MADE ON THE DRAFT LOCAL PLAN

2.1 Around twenty-four comments were submitted, which may be categorised as follows:

- support, both in principle and for specific Green Gaps;
- objections to specific Green Gaps; and
- objections to the principle of Green Gaps and questioning of the evidence base.

2.2 This report concentrates on matters of principle and the evidence base rather than addressing the boundaries of individual Green Gaps. However, acknowledging a likely need for more development to be accommodated around Retford (noting that the construction of dwellings on the former Cottam power station site is unlikely within the plan period), some consideration is given to Green Gap 7 (South of Retford) and 8 (East of Retford).

Support

2.3 Support in principle was expressed by several individuals, Parish Councils, The National Trust, Severn Trent, The Canals & River Trust. Natural England welcomed the policy, in particular references to National Character Areas (NCAs) and links to green infrastructure. Nottinghamshire CPRE clearly support landscape protection policies but consider Policy ST34 to be weaker than a policy in an earlier draft version of the Local Plan.

2.4 Two further detailed comments, which supported the principle of Green Gaps, were submitted by an independent planning practitioner who specialises in Local and Neighbourhood Plans. These acknowledged that the approach is landscape led rather than being solely focused on coalescence and that it is a fundamental part of an approach to sustainable development. It is acknowledged that the settlements with Green Gaps around them have sufficient environmental capacity to grow elsewhere and that there is potential for some development to occur within Green Gaps without affecting landscape character. The second of these comments suggests that there may be merit in having a separate Green Gaps policy, rather than the matter being addressed and a sub-part of Policy ST34. This is to be adopted and it will increase clarity and create more scope to explain how development may be possible within

or adjoining Green Gaps, subject to a landscape led approach.

Objections

2.5 Reference is made to the extent of a committed housing site (outline planning permission) north of Langold related to Green Gap 2 – this is not an objection in principle but it is recommended that BDC cross references the extent of the permission with the Green Gap map as currently drafted. Two further comments relate to the Green Gap, between Langold and Carlton in Lindrick. There is no justification to reconsider the extent of this Green Gap, which is already drawn around two housing commitments, but it is again recommended that BDC cross references the extent of the permission with the Green Gap map as currently drafted. This also needs to be checked in relation to a comment submitted on behalf of Firbeck Cricket Club concerning the extent of a committed employment site within or adjoining the Green Gap.

2.6 A further comment concerned the extent of Green Gap 3, between Carlton in Lindrick and Worksop, where it adjoins committed new housing north of Worksop. There are no drafting issues; the comment aims to maximise development by reducing the Green Gap. This is not justified in landscape terms, given the scale of recent/ committed development.

2.7 Other comments relate to Green Gaps 7 and 8, South and West of Retford. The extent of these Green Gaps and the capacity for some new residential development to be located, adjoining existing housing is considered in Section 5 (Paras. 5.9 & 5.10) of this report.

2.8 In addition to these specific comments/ objections, others question the principle of Green Gaps and the evidence base. These are summarised in the table below.

COMMENT	SUGGESTED RESPONSE
<p>Jordan Clark (for Howard Retford Ltd.)</p> <p>4.7 we object to the designation of a Green Gap in this location as a matter of principle. We consider that the Green Gap policy is not justified, serves no meaningful planning policy purpose and seeks to add an undue level of protection to land on the basis that it is not the Council's current preference for development.....4.11 Whilst there is planning merit in maintain distinctiveness and local characteristics of settlements, the Green Gap study provides no meaningful evidence to demonstrate that protection of land to South of Retford is important to maintaining its character or distinctiveness. There is nothing significant or distinctive regarding the area to the south of Retford and its relationship with surrounding villages which are physically and visually removed from Retford.</p> <p>Greg Wood for C Howcroft & Sons</p> <p>...we also object to this policy due to its lack of substantial justification, serving no meaningful planning purpose and an over the top protection from future developmentThere is no evidence to suggest the area South of Retford is important to retain the character of the town. We believe that the green gap to the south and west of Retford should be removed from the Local Plan.</p>	<p>There is a clear justification for Green Gap policies (or similar), based on planning practice and guidance. Examples can be drawn from several Local Plans and Neighbourhood Plans (see Section 3) The matter is, therefore not one of principle but more about whether the extent of any given Green Gap is justified and how the flexibility within a redrafted Green Gap policy would allow for appropriate development to occur.</p> <p>The landscape to the South of Retford is distinctive comprising north-south running ridge or plateau, with extensive views in all directions and the slopes and bottom of the River Idle valley. It provides a countryside setting, with access opportunities, for the Retford housing areas of; Ordsall, South Retford, Thrumpton & White Houses and it is a rural setting for the village of Eaton.</p> <p>Whilst is may be justifiable to examine the details of the Green Gap where it adjoins the built up area and/or to consider if well planned and landscaped residential development may be appropriate, there is no justification for the removal of Green Gap 8 in its entirety.</p>

COMMENT	SUGGESTED RESPONSE
<p>Avant Homes & Wyndthorpe Developments</p> <p>... From review of the background evidence, it is clear that the Council's intended function of the Green Gaps are to set clear, long term, defensible and recognisable boundaries using readily recognisable features such as roads, streams, belts of trees or woodland edges, footpaths/tracks, canals and railway lines. At face value, it would appear that such a prohibitive methodology shares similarities with the function of the Green Belt.... The extent of the Green Gaps are taken from the 2009 Landscape Character Assessment which had broadly characterised areas. In some cases, the landscape has changed due to development which may have affected the classification and shape of these broad areas which would resultantly implicate that the extent of the selected Green Gaps would change alongside this. An updated landscape character assessment along with a more accurate Green Gap Report assessing individual sites on their merit would be welcomed and is encouraged to provide a robust evidence base for such a restrictive policy.... A flaw of the Green Gaps Report is that the Council's preferred allocations have been excluded from the assessment and further scrutiny, implying that their environmental suitability for development has already been pre-determined.... Although it is noted that the Green Gaps have left directions for growth for some urban areas, the sustainability and viability of the remaining unrestricted land has not been factored in to the plan's flexibility to deliver housing, resulting in potential future supply issues for Bassetlaw if the preferred allocated sites are deemed unsuitable or are subsequently undeliverable over the plan period.</p>	<p>It is intended that, whilst they would be open to review in future Bassetlaw Local Plans (or any successor documents), Green Gaps should have robust and easily recognisable boundaries.</p> <p>To achieve this, applying the principles for drawing Green Belt boundaries is quite reasonable. However, this does not state or imply any intent that Green Gaps are a backdoor way of introducing Green Belt into Bassetlaw. This is made explicit in the wording of the proposed new, separate, Green Gap policy and its explanation in Section 6 of this report.</p> <p>The 2009 assessment remains pertinent in conjunction with the more recent NE Natural Character Areas. The Green Gaps have been defined based on the emerging policy context, recognising existing commitments and emerging allocations for new housing and employment around settlements.</p> <p>As noted above, should preferred/allocated sites fail to come forward within the plan period, those sites and their relationship with Green Gaps can be considered in a future review(s) of the Local Plan.</p>

COMMENT	SUGGESTED RESPONSE
<p>William Davis</p> <p>...Whilst there are no objections to Part A and B of Policy ST34 there are significant concerns regarding Part C on Green Gaps, specifically GG4: Worksope West – Shireoaks and Rhodesia. A review by a suitably qualified and experienced landscape architect (see attached) has identified that this policy is not consistent with national policy nor justified by the evidence (namely the Site Allocations: Landscape Study (November 2019) and Green Gaps Report (November 2019) as required by the tests of soundness. The Green Gaps Report justifies the inclusion of the green gap element of Policy ST34 with reference to NPPF paras 170/171, these set out three matters:</p> <ul style="list-style-type: none"> • protecting and enhancing valued landscapes; • recognising the intrinsic character and beauty of the countryside; • allocate land with least environmental or amenity value. <p>No robust evidence has been provided which follows the Guidelines for Landscape and Visual Impact Assessment Edition 3 (GLVIA) Box....</p> <p>Finally, the allocation of land of least environmental or amenity value; value has not been considered in line with the accepted guidance of GLVIA3. As such the Green Gap policy is not consistent with national policy. The Report also references Planning Guidance on the Natural Environment stating it supports Green Gaps. The quote provided from the guidance does not at any point mention Green Gaps. The only place where there may be implied support for the Green Gap policy in Plans can also include policies to avoid adverse impacts on landscapes and to set out necessary mitigation measures, such as appropriate design principles and visual screening. Excluding land by the Green Gap map based blanket 'no development' policy does not accord with the subtler requirement of the guidance seeking appropriate design principles and visual screening.</p>	<p>This is overstated, it is not prescribed that GLVIA3 is used in all studies. Indeed, the approach to defining Green Gaps was intended to be broadly based, including:</p> <ul style="list-style-type: none"> - Use of the existing evidence base (e.g. the relevant NCAs and the 2009 Study). - Recognising recent commitments and potential allocations in the Local Plan. - Taking account of Neighbourhood Plans. - Information from recent site visits. <p>The extent to which the approach to Green Gaps reflects National Guidance and good practice is, therefore, a matter of opinion.</p> <p>There is no compelling argument that not using a methodology such as GLVIA3 renders the proposed policy unsound. The Local Plan is positively prepared, and the Green Gaps policy is part of a wider approach/appropriate strategy to enable sustainable development, consistent with national policy.</p> <p>With reference to the NPPF, it is not necessary for a landscape to be designated for it to be "valued." The definition of Green Gaps will not prevent the overall development requirement from being met.</p> <p>The Green Gap policy is not about allocating sites, therefore, there is no need to specifically consider whether an area of land has the "least environmental or amenity value." For some of the intended functions of a Green Gap, the current quality of the land may not be an overriding consideration. At a more strategic level, the definition of Green Gaps is part of a wider approach to achieving sustainable development, focusing on brownfield land, new villages and the regeneration of former power station and mining sites.</p> <p>It is not correct to say that the Green Gap policy is intended to prevent all development. The proposed separate Green Gap policy (see Section 6) is explicit that if development reflects local landscape and character it may be acceptable within or adjoining a Green Gap.</p>

COMMENT	SUGGESTED RESPONSE
<p>Tom Dillarstone/William Davis</p> <p>This is a long (and quite tortuous) submission, the essential point of which is thatIn reviewing the Landscape Study 2019 the author will question whether this document is in fact a landscape character assessment and if not whether it offers robust evidence to underpin the policy and in particular the green gap proposals therein... goes on to acknowledge that green Gaps have a capacity to accommodate development. As such it is reasonable to say that the policy does not exclude appropriate development from green Gaps.... it suggests that significant development could adversely affect openness, appearance, functionality and therefore quality of these landscapes. Two issues arise from this statement, firstly what level of significance is acceptable? In GLVIA3 significance is measured from major to low or negligible. Secondly, it is important to recognise that all development has significance; it is the measure or scale of that significance that is important to the impact on landscape or its visual qualities.....However, the final policy paragraph (unnumbered) is somewhat at odds with the supporting text to the policy as it now becomes more restrictive. It now seeks a positive impact on landscape qualities whereas at 8.3.13 development must show it sits comfortably within the qualities of the landscape of the Green Gap the latter being, a more benign perhaps neutral requirement on the development. As stated, all development has an effect; it is the scale of significance that is the test, the final paragraph does not allow the significance to be measured. This anomaly between policy and supporting text should be addressed to avoid confusion.</p>	<p>See above comments on GLVIA3.</p> <p>The revised, separate Green Gaps policy will include a requirement that where proposals for development emerge in or adjoining Green Gaps, the submission should include, possibly as part of a master plan and/or landscape led approach, a detailed assessment of the local impact of the development in question. This may result in some development being deemed unacceptable or that bespoke design approaches will be needed to minimise the adverse impact of the development on the wider Green Gap/local landscape.</p>

2.9 In conclusion, regarding the comments made during the consultation on the Draft Local Plan (January 2020), it is felt that there are no objections in principle which would justify the deletion of the Green Gaps part of policy ST34 or any substantive change in direction. It is considered that by making the Green Gaps element of Policy ST34 into a separate policy, clarity will be increased especially in explaining how some development may be acceptable within or adjoining a Green Gap. Finally, where legitimate questions have been raised on the precise boundaries of the Green Gaps that do not concern the principle of the policy, BDC will check the site boundaries of recent developments, commitments and draft allocations to ensure that there is no conflict with the proposed Green Gap in question.

3 BENCHMARKING UPDATE

3.1 Section 4 of the November 2019 report considered comparable approaches in other Local Plans and planning authorities including; Hartlepool, South Hampshire and Eastleigh and covered the relationship between Green Gaps and the NPPF Paras. 170 & 171 (Section 3). This short section in the Addendum Report adds consideration of other relevant paragraphs in the NPPF and examples of corroboration for the approach in Bassetlaw from other (examined) Local Plans and Neighbourhood Plans.

3.2 The Inspectors report into the 2017 Adur Local Plan (West Sussex) confirmed the acceptability of Green Gaps in principle, noting that: "Great importance should be attached to the requirement for good design and the NPPF confirms that a strong sense of place should be established; that the different roles and character of different areas should be taken into account; and that development should respond to local character. Para. 61 advises that policies should address the connections between people and places and the integration of new development into the natural, built and historic environment. One of the objectives should be to improve the character and quality of an area and the way it functions and in broad terms Plans should identify land where development is inappropriate."

3.3 Whilst raising the question of whether the detailed boundaries of Green Gaps were appropriate, the Inspector concluded that; "On the basis that it is important for communities to retain their independent character and qualities I agree with the Council that the identification of local green Gaps is a justified and necessary approach. Such Gaps serve a legitimate planning purpose in preventing settlements merging together."

3.4 In other parts of the Midlands where, as in Bassetlaw, there is no Green Belt, Green Gaps, Green Wedge and Areas of Separation policies have been included in Local Plan over many years to direct development to appropriate locations as part of achieving sustainable development. These examples include: East Staffordshire Local Plan (adopted in 2015), Leicester Core Strategy (adopted in 2014), Charnwood Core Strategy (adopted in 2015), NW Leicestershire Local Plan (adopted in 2017) and the Site Allocations & Development

Management Policies DPD (adopted in 2016). There are several examples of how these policies have been upheld in planning appeals:

- APP/K2420/A/12/2181080/NWF – Land E of Groby Cemetery, Ratby Road, (H&BBC).
- APP/G2435/A/12/2182880 – Loughborough Road, Peggs Green, Coleorton (NWLDC).
- APP/G2435/A/11/2158154 – N of A511, Stephenson Way, Coalville (NWLDC).

3.5 The Cheshire East Draft Site Allocations & Development Policies Document forms Part 2 of the Local Plan Strategy. The Local Plan includes policies for the Green Belt, Strategic Green Gaps and Local Green Gaps. These may help to inform policy wording in Bassetlaw, but this Local Plan is yet to be submitted.

3.6 In upheld appeals, the housing supply situation often determines the outcome. If there is a shortage and high demand, Inspectors tend to conclude that the benefit of new housing outweighs the harm to the area. As far as Bassetlaw is concerned, the emerging Local Plan is positively prepared and aims to meet the dwelling requirement through a balanced strategy to achieve sustainable development, of which Green Gaps are a legitimate part.

3.7 In a Neighbourhood Plan examination (East Hagbourne, South Oxfordshire – April 2019), the focus was on specific boundaries, rather than the principle of Green Gaps. The Examiner makes several points that may be applicable to Bassetlaw.

3.8 The first concerns the principle of Green Gaps referring to character, setting, coalescence and appropriate development. It states: "As the Plan explains the various local green gap policies are intended to prevent coalescence between the communities of East Hagbourne, Coscote and Didcot. They are also intended to preserve the distinctive individual characters and settings of the various communities. The Plan also comments that the local green gap policies do not seek to prevent development or open land uses that would otherwise be suited to a countryside location. Their primary purpose is to ensure that any development proposals do not result in the integrity of the Gaps being undermined."

3.9 The second refers to the overall principle

and the Basic Conditions, stating: “In principle I am satisfied that the concept of local green Gaps in the identified locations is appropriate and meets the basic conditions. The Gaps have been carefully chosen to reflect the Garden Town principles for the future development of Didcot in the emerging Local Plan.”

3.10 A third conclusion suggests that a Green Gap can be relatively extensive, dependent on what opportunities there are to define boundaries and they state “....there is no reasonable or practical way in which the proposed local green gap could be subdivided to generate a smaller area. This reflects the expansive and open nature of the landscape concerned and the lack of any substantive internal boundaries within the proposed local green gap.”

3.11 Overall, therefore, reference to other Plans and decisions indicate that the designation of Green Gaps, with appropriate boundaries and some flexibility in terms of development that may be permitted within and adjoining them, is an established and reasonable approach. This is especially so when known development requirements can be met in other locations as part of a strategy to achieve sustainable development, in accordance with the NPPF.

4 CONSIDERATION OF POST COVID 19 PLANNING AND RECENTLY ANNOUNCED CHANGES

4.1 The impact of the Covid-19 outbreak has yet to be translated into any permanent changes to planning legislation and guidance. However, it is possible to draw some reasonable conclusions, especially in relation to the need for accessible open spaces and countryside close to where people live. A reasonable argument can be that that, in addition to the roles that Green Gaps play in landscape, local character and the identity of settlements, they can contribute to health and well-being in terms of exercise, recreation, active travel and views into the countryside.

Proposed changes set out in the White Paper

4.2 The current consultation on changes to the planning system; Planning for the Future (August 2020) and the likelihood of a more zonally based Local Plan system emerging may have implications for Green Gap policies. The emphasis is on streamlining policy making and increasing the rate of housebuilding, but that would not prevent Green Gaps being part of an overall approach to achieving sustainable development. Indeed, it can be argued that Green Gaps could be an important means of ensuring that: “We will build...homes with green spaces and new parks at close hand...” (Foreword from the Secretary of State). They may also help to achieve the stated objective of; “creating a virtuous circle of prosperity in our villages, towns and cities, supporting their ongoing renewal and regeneration without losing their human scale, inheritance and sense of place.”

4.3 Green Gaps may help to fulfil the key proposal in terms of zoning, when used to identify: “Renewal areas suitable for some development..... and Protected areas.....where development is restricted.” In the more detailed sections of the White Paper it is acknowledged that Protected Areas may “...also include areas of open countryside outside of land in Growth or Renewal areas.” Green Gaps could support the intent to: “Ask for beauty and be far more ambitious for the places we create, expecting new development to be beautiful, and to create a ‘net gain’ not just ‘no net harm’, with a greater focus on ‘placemaking’ and ‘the creation of beautiful places’ within the NPPF.

4.4 Finally, the White Paper proposes the increased use of Design Codes to achieve quality. This could complement the intended (landscape and character led) masterplan approach that the new, separate, Green Gap policy in the Bassetlaw Local Plan will require for development within or adjoining Green Gaps.

Consideration of the Local Plan Programme

4.5 The current consultation closes on 29th October 2020. The Implementation Section (What Happens Next? P74) states that; “The proposals allow 30 months for new Local Plans to be in place so a new planning framework, so we would expect new Local Plans to be in place by the end of the Parliament.” The end of Parliament is scheduled for December 2024. The programme for the new Bassetlaw Local Plan is set out in the Council’s Local Development Scheme.. It proposes that the Plan could be adopted by the end of 2021. This suggests that the new Local Plan could have an operational life of up to 3 years.

4.6 The development sector and local communities both benefit from the increased certainty that results from having an up to date Local Plan in place. This relates to a strategy that determines locations where development will be appropriate, places where it will not and where particular attention to scale, layout and design will be important. Green Gaps have a critical role to play in such a strategy.

4.7 Green Gaps have been introduced in the 2020 Consultation Version of the Local Plan Review, but they were not included in the earlier (2019) version or in the previous adopted Local Plans. These documents contained strong landscape policies, but they were not area or location specific. The introduction of defined Green Gaps, as part of a strategy for sustainable development, including brownfield development, targeted regeneration and, where necessary/justifiable greenfield locations, helps to increase certainty and confidence.

4.8 As noted above (4.3) in many ways Green Gaps anticipate the proposed changes to the planning system related to zoning. Given the degree of support which the proposed Green Gaps have enjoyed in the recent consultation, there is merit in their being pursued and in place

ahead of the longer term editions of the Bassetlaw Local Plan which will follow primary legislation to introduce a new planning system.

4.9 It is recommended that the current review of the Local Plan, including a specific and separate Green Gaps policy as outlined in this report, is pursued in the next version of the emerging Local Plan.

4.10 The establishment of the proposed Green Gaps can subsequently inform the identification of areas of land/zones that are to be defined for; “Growth” “Renewal” or “Protection”, if and when the proposed changes to the planning system are implemented.

5 REVIEW AND RESTATE THE PURPOSE OF GREEN GAPS AND THE JUSTIFICATION FOR THEM

5.1 The definition of Green Gaps, within the November 2019 report and the Local Plan remains sound. In that report (Section 5 Principles...), reference is made to the following.

- They are not intended to duplicate existing policies/designations (e.g. Green Belt, Local Green Space, Open Countryside, Protected Landscapes and Habitats);
- the purpose is to help to manage the location and scale of future development...to protect and where possible enhance the setting and character of settlements;
- they are different to the Green Belt (of which there is none in Bassetlaw). The development restrictions within Green Gaps are not intended to be as categorical or limited as in Green Belt areas. Indeed, there may be potential for different forms of development provided that the necessary consideration is given to scale, location, siting and design;
- however, some Green Belt principles apply; to prevent neighbouring towns from merging, assist in safeguarding the countryside from encroachment and to assist in urban regeneration; and
- as with the Green Belt, but unlike designated landscapes/habitats, landscape quality may not to be a defining feature. The value placed areas by the local community may be relevant.

5.2 The Local Plan (Policy ST34, preamble) distils this approach into the following text.

8.3.8 There are a number of locations throughout the District where important undeveloped areas of land exist between settlements and around settlement fringes. Some of these areas are protected - such as by a Conservation Area - and landscape has added significance.

8.3.9 Gaps between settlements also help give the sense of leaving one place and arriving at another. Feedback from public consultation stressed the importance of communities retaining their individual identity. In places, such as Carlton in Lindrick, landscape characterise village character as distinct from nearby suburban areas of Worksop.

8.3.10 The importance of landscape has been identified through Green Buffers in some 'made'

neighbourhood plans, but the District lacks a comprehensive approach to this issue. Policy ST34 provides a single, consistent approach to Green Gaps to provide greater certainty for developers and landowners.

8.3.11 The Bassetlaw Green Gaps Report 2019 analyses the sensitivity of landscape around the main settlements (Worksop, Retford and Harworth and the five Large Rural Settlements). It provides guidance on their landscape quality in terms of openness, appearance and function and their capacity to accommodate development.

8.3.12 Policy ST34 defines Green Gaps where significant development could adversely affect openness, appearance, functionality and therefore quality of these landscapes.

8.3.13 Green Gaps do not prevent development taking place. Policy ST34 ensures that where it can be demonstrated that appropriate forms of development, such as for agricultural buildings and other rural uses, are able to sit comfortably within the open character, role and function of the Green Gaps, they will be supported. It is also important that sites adjoining the Green Gaps have regard to their landscape characteristics to ensure development is designed/situated appropriately to minimise negative impact on Green Gaps.

8.3.14 Evidence will need to show that the proposal has considered the effect on the role, function and openness of that Green Gap, through for example; siting, design and landscaping of new development.

5.3 Since that policy was drafted, as noted in earlier sections, circumstances have changed and consultation comments need to be considered to take account of the following.

- To increase clarity, a separate Green Gap policy will be drafted.
- To reduce ambiguity between Green Gaps and Green Belt, e.g. by noting that a Green Gap, whilst intended to be robust/lasting, could be reviewed at each iteration of the Local Plan or every 5 years.
- A recent review of the planning system (a White Paper published on 5th August 2020) indicates a move towards a zonal system, where land is defined into three categories; "growth", "renewal" or "protected" - affecting the level of planning permission needed. It could be inferred that Green Gaps would fall into the "protected" category. This

may not prevent all development, but could require a more detailed planning permission process?

- The response to Covid-19, although not translated into planning measures, may place increased value on accessible countryside around towns. Green Gaps would support this.

5.4 Based on the above, the following additional emphases could be incorporated into a new standalone Green Gaps policy and the accompanying explanation.

- Acceptance that some development may be allocated or promoted within Green Gaps. Any development however will be subject to strict design codes and will be landscape-led.
- Specified requirements for proposals within or adjoining Green Gaps to be landscape led and the application of a sequential approach where applicants either must prove that alternative sites are not available or suitable or there is a proven need for development in that location.
- A commitment to review the extent of Green Gaps as part of future Local Plans or every 5 years.

5.5 Drafting errors, (e.g. an inconsistency between the GG8 (Retford West) map in the Nov. 2019 Report and the Local Plan Policies Map, which shows the correct inner boundary of the Green Gap, but does not show all of the outer boundary) and any conflicts between Green Gaps and commitments can also be addressed.

5.6 Although several comments on Policy ST34 are critical, they concern individual sites, rather than the principle of Green Gaps. As demonstrated in Section 2 there is no justification to abandon Green Gaps or for a fundamental review of the principle.

5.7 Finally, a key question is whether a reconsideration of the policy, should also include boundaries (as defined in the Draft Plan) or, whether flexibility to enable well planned sensitive and appropriate development within Green Gaps is maintained or increased? This may involve including a statement that new housing, employment or commercial uses may be possible in Green Gaps if they are of an appropriate scale and design such that the integrity, usability and landscape quality of the Green Gaps in question is not undermined .

5.8 As part of providing for appropriate

development within and adjoining Green Gaps, it may also be applicable to apply a sequential approach such that sites should not be brought forward unless an analysis has been carried out which shows that there are no other suitable locations to meet specified development requirements.

5.9 In specific terms, the issue of whether there is scope for planned new development in Green Gap 7 (South of Retford) and Green Gap 8 (West of Retford), has to be addressed in the Local Plan. Additional development needs to be located in Retford because the Cottam Power Station Priority Regeneration Area is not expected to deliver significant numbers of new housing within the Plan Period and Retford has very little suitable alternative land.

5.10 A further site visit was undertaken on 7th Aug. 2020 to consider if new housing could be accommodated South of Landsdown Drive and Gleneagles Way, adjoining the existing estates without undermining the principle of the Green Gaps. It was concluded that this may be possible, provided that a bespoke, landscape led approach, articulated in a Master Plan is adopted, taking account of the following issues/opportunities. A masterplan for the site should include bespoke design codes that are landscape-led and consider the positive attributes that contribute towards the Green Gap designation, including:

- (a) A landscape framework, taking account of footpaths, views and habitat connectivity.
- (b) Consideration of house types, including single storey dwellings, to take account of visual impact and the rural character of the area.
- (c) To retain, enhance and extend existing footpaths in terms of landscape and safety.
- (d) Topography means that development may be possible, if limited to an area defined by the public rights of way. On Ollerton Road, the land rises slightly to the south, from 29.6m to 31 m at the footpath, but then falls to 25.7m at the Eaton Road junction. To the East, land falls from 29.6m to 25m, near the footpaths and before falling away to 16m in the Idle valley. On the field to the West, the land rises gently from 29.6m to 32m, at Brecks Road, falling to 20m in the small valley.

(e) In these two Green Gaps landscape quality and views are of greater importance than coalescence (with Eaton) which is over a kilometre to the South East. However, urban sprawl should be avoided.

6 RECOMMENDATIONS, INCLUDING WORDING FOR A SEPARATE GREEN GAPS POLICY

Recommendation A - Separate Green Gaps Policy

6.1 The intention of making the Green Gaps policy separate from (but complementary to) the overall Landscape Character Policy ST34 is to improve clarity and enable more details to be given about Green Gaps, especially their purpose and the scope for development within and adjoining them.

6.2 The Green Gaps element within the current Policy ST34 reads as follows:....

C. Green Gaps, as shown on the Policies Map, are designated between: 1. GG1: Bircotes – Bawtry.....8. GG8: Retford West. Development of undeveloped land and intensification of developed land in and adjoining the Green Gaps will only be supported where it does, either individually or cumulatively, with other existing or proposed development have a positive impact on the openness, appearance and functionality of their landscape quality.

6.3 Paras. 8.3.8 to 8.3.14 explain the concept and applicability of Green Gaps, see below:

8.3.8 There are a number of locations throughout the District where important undeveloped areas of land exist between settlements and around settlement fringes. Some of these areas are protected - such as by a Conservation Area - meaning that landscape has added significance.

8.3.9 Gaps between settlements also help give the sense of leaving one place and arriving at another. Feedback from public consultation stressed the importance of communities retaining their individual identity. In places, such as Carlton in Lindrick, landscape characterise village character as distinct from nearby suburban areas of Worksop.

8.3.10 The importance of landscape has been identified through Green Buffers in some 'made' neighbourhood plans, but the District lacks a comprehensive approach to this issue. Policy ST34 provides a single, consistent approach to Green Gaps to provide greater certainty for developers and landowners.

8.3.11 The Bassetlaw Green Gaps Report 2019

analyses the sensitivity of landscape around the main settlements (Worksop, Retford and Harworth and the five Large Rural Settlements). It provides guidance on their landscape quality in terms of openness, appearance and function and their capacity to accommodate development.

8.3.12 As such, Policy ST34 defines Green Gaps where significant development could adversely affect openness, appearance, functionality and therefore quality of these landscapes.

8.3.13 Green Gaps do not prevent development taking place. Policy ST34 ensures that where it can be demonstrated that appropriate forms of development, such as for agricultural buildings and other rural uses, are able to sit comfortably within the open character, role and function of the Green Gaps, they will be supported. It is also important that sites adjoining the Green Gaps has regard to their landscape characteristics to ensure development is designed and situated appropriately to minimise negative impacts on the Green Gap.

8.3.14 Evidence will need to show that the proposal has considered the effect on the role, function and openness of that Green Gap, through for example; siting, design and landscaping of new development.

6.4 Alongside the separate Green Gaps policy, the other (district wide) elements in clauses A and B of the existing Policy ST34, will also apply and will need to be cross referenced. Reflecting this, along with other necessary changes to the policy wording and explanation, a revised wording is set out below.

Green Gaps

Green Gaps form an important part of Bassetlaw's landscape character. They are open areas located around or between settlements with identifiable characteristics that should be conserved and enhanced. Designation has been informed by the Bassetlaw Landscape Character Study (2009) and the Bassetlaw Green Gap Study (2019 and revised 2020). The Green Gap Study (2019) identified eight areas across the District. These areas are, or could be, under pressure from unplanned development which could lead to undue harm or erode the locally valued characteristics of the area. The Green Gaps largely comprise agricultural fields, but also include woodlands, historic landscapes, public rights of way, rural buildings, watercourses and, in

some cases, an undulating landform and wide open views.

Green Gaps comprise the open areas around, and between, parts of settlements which maintain the distinction between the countryside and built-up areas, prevent the coalescence of adjacent places, create recreational opportunities and provide protection for local biodiversity. The objective of Green Gap designation is to carefully manage the long-term use of land and development in ways that can benefit the need for sustainable development at the same time as respecting the local landscape in terms of: visual amenity, access to the countryside, biodiversity and the well-being of local residents. To achieve this complex and multi-faceted objective, the following factors should be taken into account.

- Landscape character and the setting and identity of individual settlements;
- Guide the form of new development, avoiding urban sprawl and coalescence;
- Protection/improvement of wildlife sites and the links between them;
- Protection/improvement of historic/cultural assets and the links between them;
- Green lungs, with safe and usable access, linking local and strategic green infrastructure;
- The potential of new development to contribute to the enhancement of the above.
- The need to maintain flood mitigation features and water storage areas.
- Evidence that other (nearby) sites, outside the Green Gap in question, are not available and more appropriate for the development that is being proposed.

There is benefit in Green Gaps being perceived as long term, but in recognition of how circumstances and context may change, the extent and role of any Green Gap may be reconsidered when the Local Plan (or a successor document) is reviewed.

Policy ST??. Green Gaps are proposed, as shown on the Policies Map, at:

Green Gap 1: Bircotes - Bawtry

Green Gap 2: Oldcotes-Langold-Carlton in Lindrick

Green Gap 3: Carlton in Lindrick – Worksop North

Green Gap 4: Worksop West

– Shireoaks and Rhodesia

Green Gap 5: Clarborough – Welham

Green Gap 6: Retford East

Green Gap 7: Retford South – Eaton

Green Gap 8: Retford West

Any development proposed within or adjoining a Green Gap will need to respect the openness and character of the landscape through good and effective design. Development of existing undeveloped land and intensification of developed land will only be supported where, either individually or cumulatively with other development, it has a positive impact on the openness, appearance and functionality of the landscape. All proposals should:

- 1 Maintain the identity of and separation between existing settlements.
- 2 Recognise the need for a sympathetic and complementary relationship between the urban and rural environments.
- 3 Demonstrate high-quality design, reflecting local landscape and rural character.
- 4 Promote recreation and public access opportunities.
- 5 Protect biodiversity.

The purpose of Green Gaps is to protect the open and undeveloped character of land, but it is not intended that they are an absolute restriction on development. Proposals within and adjoining Green Gaps need careful consideration of good design to avoid detrimental landscape impact and should be design led. It will be necessary to demonstrate that development does not conflict with the functions and character of the Green Gap. This requirement should be met by applying master-planning and design code principles as identified in the Design Quality SPD. This approach should be adopted for “Major Developments” (defined in the NPPF) as 10 or more dwellings or larger than 0.5 hectares. A localised rather than standard approach should be used, and proposals should provide a statement about the qualities of the location and settlement involved. Reference should be made to site specific surveys and to details in the Bassetlaw Landscape Character Study (2009), Landscapes Sites Assessment (2019) and Green Gaps Reports (2019/2020).

Evidence should be supplied, using the principles of the Sequential Approach that there are no appropriate sites for a proposed development, outside the Green Gap in question.

In addition to satisfying this location specific policy, proposals must also meet the wider requirements of Policy ST32, Policy ST34 and the Design Quality SPD.

Recommendation B (To correct mapping inconsistencies)

6.5 Comments on the Draft Plan referred to inconsistencies between commitments, (permissions/allocations) and Green Gaps. BDC should check the mapping of Green Gap 2 (Oldcotes/Langold/Carlton in Lindrick) and (Carlton in Lindrick – Worksop North).

6.6 The map of Green Gap 8 (Retford West) in the 2019 Report does not show the full extent of the Green Gap (omitting an area to the South of the railway line at Ordsall/Whisker Hill). The correct area, which was described in the report is shown on the attached plan.

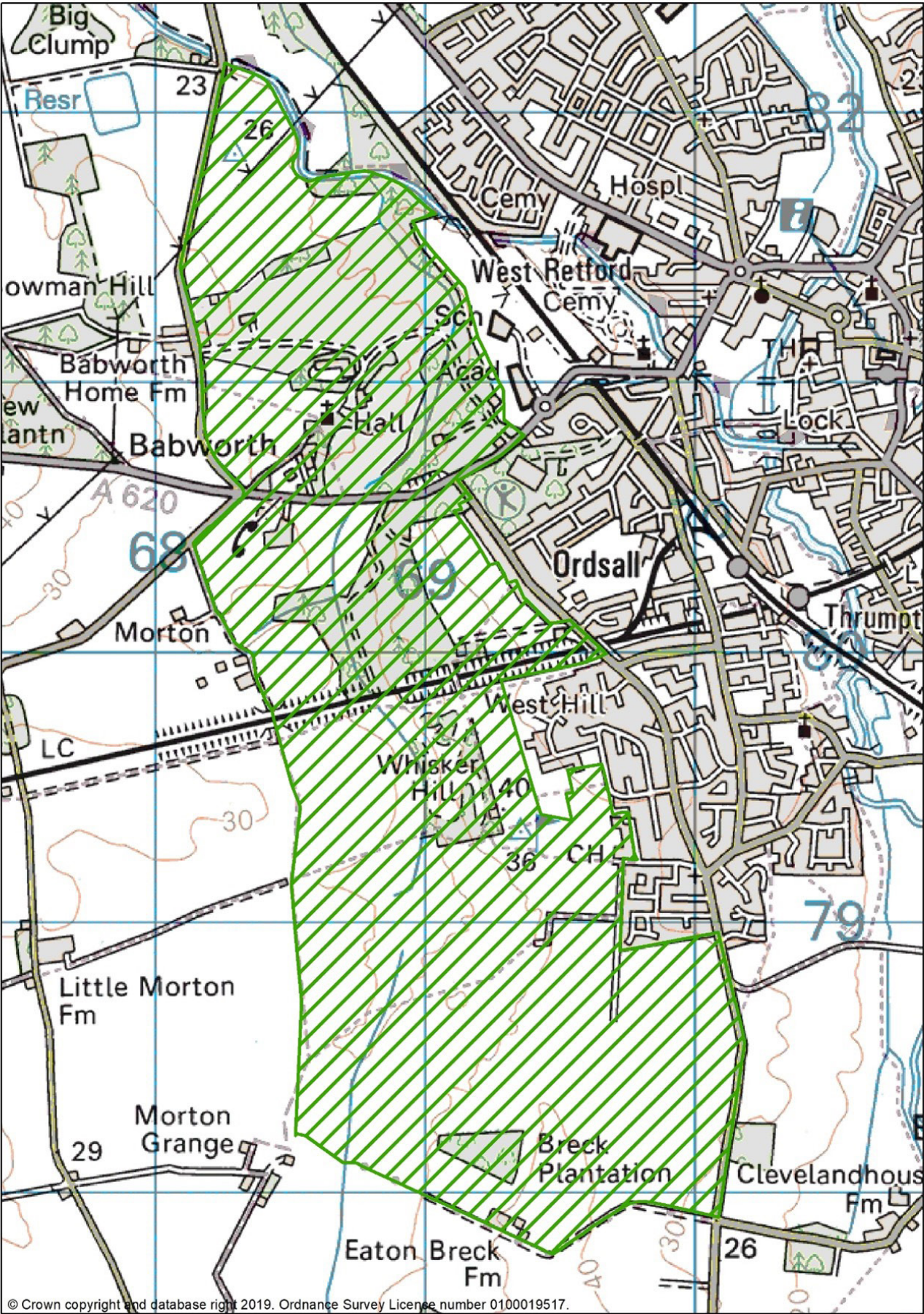
6.7 The Local Plan Policies Maps show the correct inner boundary of Green Gap 8 but (as with some others) not the entire outer boundary. It is desirable for all the Green Gaps to be shown in their entirety on the Proposal Maps in the next version of the Local Plan.

Recommendation C (Changes to the Planning System)

6.8 The current consultation on major revisions to the planning system in England will lead to changes in Local Planning, with implications for policies like Green Gaps. It is recommended that, whilst maintaining progress on the current Local Plan, BDC takes part in the consultation, emphasising the way that Green Gaps can contribute to a post Covid-19, zonally based planning system. BDC should also seek clarification on whether a Green Gap should be regarded as a “Protected Area” or a “Renewal Area”. The point may also be made that Green Gaps can fulfil the stated intentions of the White Paper to enable the creation of “...Beautiful Places...” and to ensure that development can take place without towns and villages “...losing their human scale, inheritance and sense of place.”

Map of Green Gap 8 (Retford West)

Green Gap 8





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