

**WRITTEN STATEMENT IN RESPECT OF THE BASSETLAW LOCAL PLAN 2020 – 2038 EXAMINATION
MATTER 2: VISION & OBJECTIVES, SPATIAL STRATEGY & LOCATION OF NEW DEVELOPMENT,
AND THE SITE SELECTION PROCESS**

Planning & Design Group (P&DG) on behalf of Welbeck Estates Company Limited

4. INTRODUCTION

- 4.1. This Written Statement is made on behalf of our clients, Welbeck Estates Company Limited (Welbeck), in response to the Inspector's Matters, Issues and Questions of the 7 October 2022 for the examination hearings of the Bassetlaw Local Plan 2038.

5. ISSUE 2 - ARE THE PROVISIONS OF THE PLAN IN RELATION TO THE SPATIAL STRATEGY & LOCATION OF NEW DEVELOPMENT JUSTIFIED AND CONSISTENT WITH NATIONAL POLICY?

Q. 2.1 Is the proposed spatial strategy and the distribution of development (as set out in policies ST1 and ST2) supported by robust and up-to-date evidence and otherwise soundly based? In particular:

- a) Does it reflect the vision and objectives of the plan?**
- b) To what degree is the spatial framework in Policy ST2 based on the settlement hierarchy in Policy ST1? Is the focus on strategic allocations in the larger urban settlements justified and soundly based?**
- c) Would the pattern of development proposed meet the needs of larger settlements in the district?**

- 5.1. P&DG does not believe that the spatial framework (as set out in ST1 and ST2) reflects the Vision and Objectives of the Plan. Objectives include new development delivered in sustainable locations that respects the environmental capacity of the district and supports a sustainable pattern of growth across urban and rural areas. In addition, the plan states the Council will seek to provide a choice of land to ensure that the district's housing stock better meets local housing needs and aspirations of all residents by providing a range of market, affordable and specialist housing types, tenures and sizes in appropriate and sustainable brownfield and greenfield locations, within and on the edge of settlements
- 5.2. It is agreed that there is a basic link between policies ST1 and ST2 in terms of identified settlements for development, but P&DG does not agree that overall, it is justified or soundly based (see below).
- 5.3. Policy ST1 simply splits rural settlements into 'large' and 'small'. P&DG has consistently requested a further settlement category between large and small rural settlements, to illustrate those settlements with a particular importance as a rural hub and to provide consistency with Neighbourhood Plans (see below). Not having this flexibility is very limiting, particularly to the

delivery of sustainable development and a choice of housing land as sought in the plan's vision and objectives.

- 5.4. This is worsened by using arbitrary blanket development 'caps' as set in Policy ST2 (20% for larger villages and 5% for smaller villages). The use of caps in this instance goes completely against 'The presumption in favour of sustainable development' which is at the heart of the National Planning Policy Framework (NPPF). If a development proposal is shown to be sustainable, it should be supported by the Council, regardless of any 'cap'. Furthermore, the overall housing target in ST1 of 10,476 dwellings is (quite correctly) identified as a minimum. This NPPF compliant approach by the Council is then contradicted by the development 'caps' in Policy ST2 which arbitrarily limit growth.

Q.2.2 What is the evidential basis for the settlement hierarchy in policy ST2? Does this accurately reflect the pattern of settlements across the district? Is this up-to-date? How does this inform the development strategy? What other factors influenced the strategy, such as physical and environmental constraints?

- 5.5. P&DG believe the proposed settlement hierarchy is flawed. An example would be Cuckney (identified as a small settlement in the plan). The settlement is covered by the Cuckney and Norton, Holbeck and Welbeck Neighbourhood Plan July 2022 (CNHW Neighbourhood Plan) which forms part of the district's Development Plan (please note this is a review of the Neighbourhood Plan which was first 'made' in 2017). Cuckney's role spatially is well defined within the CNHW Neighbourhood Plan (in supporting all other settlements in the plan area). Cuckney already includes several Neighbourhood Plan allocations (see below) that would be prejudiced by the proposed capping of growth in the small rural settlements (see above). As it stands in Cuckney offers the following key facilities:

- Primary school.
- Village hall and café.
- Public house.
- Place of worship.
- Car garage.
- Homeware/interior décor shop (in the ownership of the Estate)
- Bus service between Edwinstowe and Market Warsop.
- Community garden; and
- Cricket club.

- 5.6. Furthermore, because of the unique relationship with it has with other settlements including Norton, Holbeck and Welbeck (note they are all covered by the same Neighbourhood Plan), Cuckney is in proximity to several other amenities including the Welbeck Farm Shop, Harley Gallery and Portland Collection, Notcutts Garden Centre, Lady Margaret Hall and adjacent tennis courts. There is also the unique and extensive range of enterprise opportunities across the Welbeck Estate,

including the agricultural and land management activities of the estate, the School of Artisan Food and Bakery, Welbeck Dairy, Avonside Renewables, Welbeck Brewery, Wood Yard, Kitchen Garden among others, plus the growing portfolio of holiday accommodation supporting attracting local workers. There is also a limited post office at Holbeck Woodhouse. Many of the tenanted Estate properties within Cuckney and these settlements house local families or those either with a current or former working involvement to the Estate, and whereby a special personal attachment to using its facilities typically exists. Collectively, this demonstrates not just an above average range of amenities for Cuckney but also a distinction in the way they are likely to be used which should therefore not be considered just a 'small' rural settlement (please note that the same can be applied to Holbeck and Norton which should not be considered simply as 'open countryside' in the plan since they are an intrinsic part of the Parish, and either could be considered with Cuckney per the way the made Neighbourhood Plan covering this area applies or independently in their own right). The Inspector that made the original Neighbourhood Plan determined that Cuckney, Norton, Holbeck and Welbeck were a combined 'neighbourhood' in the original plan and the new Neighbourhood Plan only serves to amplify that position.

- 5.7. It is considered therefore, that Cuckney should sit in a new settlement category between small and large settlements. Many other authorities have small, medium, and large settlements as part of the settlement hierarchy as it provides a greater opportunity to ensure that development is directed to the most sustainable settlements within the district and P&DG has consistently said throughout the plan process that Bassetlaw should adopt this approach also.
- 5.8. In the case of Nether Langwith, P&DG has raised concerns with the assessments made considering the sustainability of this settlement. Any assessment of Nether Langwith should include nearby amenities that lie over the district boundary into Bolsover (in other words encompassing the amenities of adjacent Langwith and Whaley Thorns). If an assessment were to include these amenities, it would substantially change the category of the settlement from small to large.
- 5.9. If all the settlements above are considered together, the following amenities are within walking distance of the part of Nether Langwith included within Bassetlaw. This is by no means an exhaustive list, but does illustrate Nether Langwith to be commensurate to a 'large rural settlement':
 - Railway station with an hourly service each way from Nottingham-Worksop and connections to Sheffield, Retford and Lincoln.
 - Regular bus services to Chesterfield, Mansfield, Edwinstowe and Worksop.
 - Medical centre.
 - Poulter Country Park.
 - Primary schools.
 - Two post offices and local convenience stores (various).
 - Boots Pharmacy.

- Coffee shop.
 - Florists.
 - Takeaway outlets.
 - Hairdressers and beauty salon.
 - Public houses (various).
 - Places of worship.
 - Motor garage.
 - Sports and social club.
 - Heritage centre.
 - Village hall.
 - Care home.
 - Sports pitches and play area.
 - A small but important commercial offer for local businesses; and
 - Community allotments.
- 5.10. To further this point, when the wider settlements adjoining Nether Langwith are considered, the settlement will have all the facilities required to make it a 'Large Rural Settlement' (para 7.19 of the 'Spatial Strategy Background Paper (Updated August 2021)' states that the criteria for Large Rural Settlements are those that play a role as a "service centre" for other smaller villages and have 500 or more dwellings and all of the following facilities; a primary School, Doctors Surgery/ health centre, post office a community centre/hall and a village shop or convenience store).
- 5.11. Moreover, the sustainability merits of this settlement have been extensively proven in favour of existing planning consents 16/01216/FUL and 20/00634/RES south of Portland Road; with Reserved Matters permission granted in October 2020.
- 5.12. When compared to other settlements within the large rural designation, (including Misterton and Carlton in Lindrick), the combination of Nether Langwith, Langwith, and Whaley Thorns present a similar, if not greater variety of services and amenities. In addition to this, the accessibility of the settlement is much better than other Large Rural Settlements due to its railway station, offering services to Nottingham and Worksop and related connections. To illustrate these observations, please see drawing 18.009/1 showing the level of amenities within sustainable distance of households and businesses within the Bassetlaw part of Langwith, that are not presently being considered effectively in the plan for future development requirements in this part of the District.
- 5.13. P&DG has also raised concerns with the omission of Norton and Holbeck in the settlement hierarchy, for reasons given throughout its representations. With the suggestion that Cuckney should be considered above that of a 'Small Rural Settlement', the role of Norton and Holbeck within the Parish's made Neighbourhood Plan includes several allocations for growth. The plan's restrictive caps (see above) are incompatible with this shared vision across all settlements within

the Neighbourhood Plan and the level of growth contained within it. It is P&DG's view that both settlements should be included as a small rural settlement.

Q.2.3 What other spatial strategies and distributions of growth were considered during plan preparation, and why were they discounted? Where is the evidence for this? Were alternative approaches tested in the Sustainability Appraisal work?

5.14. P&DG has no comment to make.

Q.2.4 Do policies ST1 and ST2 allow sufficient development in large rural settlements, small rural settlements and other villages to comply with para 79 of the Framework? How were the proportions of development proposed for each settlement arrived at?

5.15. Are stated above, P&DG does not support the blanket growth caps. Each settlement should be considered on its own merits based on capacity to take development. This is in line with the overall housing target in the plan being a 'minimum' and 'The presumption in favour of sustainable development' approach set out in the NPPF.

Q.2.5 Are the proposed settlement development boundaries appropriately drawn? What factors were taken into account in designating these? Is the approach taken in relation to settlement boundaries in Small Rural Settlements justified and consistent with national policy?

5.16. The plan does not propose settlement boundaries for Small Rural Settlements and this is supported by P&DG. It represents a progressive approach by the Council and is NPPF compliant.

Q.2.6 Have the sites allocated for development in the plan been appraised and selected in comparison with possible alternatives using a robust and objective process?

5.17. The Council has published its Bassetlaw Local Plan Site Selection Methodology Update May 2022 (doc ref: SS – 025) which sets out its approach to site selection and allocation. P&DG believe the process itself seems fair and robust (taking into consideration constraints, location, proximity to service and facilities and deliverability etc...). The whole allocation process however has been negatively impacted by the limited and inflexible Settlement Hierarchy and blanket caps to development (all explained above). These limitations would have fed into the site selection.

Q.2.7 Are the plans assumptions in relation to the amounts and timing of development to be delivered through neighbourhood plans and the Worksop Central Development Plan soundly based?

5.18. The simple answer is no. Again, using the example of Cuckney, the CNHW Neighbourhood Plan July 2022 allocates some 25 dwellings just in Cuckney. According to policy ST2 however, only 8 dwellings are proposed for the village (5% growth with Cuckney designated as a 'Small Village'). This shows a

major disconnect between the plan and a made Neighbourhood Plan (both being part of the same Development Plan as well). Furthermore, the CNHW Neighbourhood Plan July 2022 also includes other allocations in settlements not identified for development (as explained above) under policy ST2. Again, the Plan is not in-line with a made Neighbourhood Plan.

Q.2.8 Are policies ST1 and ST2 otherwise justified and consistent with national policy? Are there any omissions in the policies and are they sufficiently flexible?

- 5.19. For the reasons set out above, P&DB believes policies ST1 and ST2 are flawed and inflexible. This can be remedied however, with the changes suggested above and which can be made through the 'Main Modifications' process.

Q.2.9 Do the vision and objectives of the plan adequately address matters of climate change and air quality?

- 5.20. P&DG believes that whilst the Plan's vision and objectives do address matters of climate change and air quality, they are not followed into several policies where sustainable development is inhibited (see comments relating to the Settlement Hierarchy and development caps).

Q.2.10 Are the Council's proposed modifications to the policies necessary for soundness?

- 5.21. P&DG has no comment to make.