

Examination of the Bassetlaw District Council Local Plan 2020-2037

Hearings in response to the Matters, Issues and Questions (dated 7th October 2022)

Hearing Statement prepared by Savills (UK) on behalf of private landowner: Carr Family – Land to the south of Coalpit Lane, Elkesley



Matter 2 – Vision and Objectives, Spatial Strategy and Location of New Development and the Site Selection Process

Introduction

- 1.1 Savills (UK) Ltd welcomes the opportunity to make representations in response to the Schedule of Matters, Issues and Questions (MIQs) for the Examination of the Bassetlaw Local Plan. The comments enclosed within these representations are made on behalf the Carr Family, a private landowner in respect of Land to the south of Coalpit Lane, Elkesley (the site).
- 1.2 The comments made within this statement directly address the matters identified in the Schedule of MIQs. The statement relates solely to the matters raised in our earlier representations and explains which particular part of the Plan is considered to be unsound with adequate justification as required. This statement also outlines, in our view, what proposed amendments are required in order to make the Plan sound.
- 1.3 Each matter, issue or question being addressed is clearly identified as follows.

Question 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?***
- 1.4 Draft Policy ST1 sets out the spatial strategy, including the distribution of new housing within the emerging Local Plan, with the overall objective of delivering sustainable growth across the district. Draft Policy ST2 focuses on growth in rural Bassetlaw.
- 1.5 It is our understanding that the evidence which underpins draft policies ST1 and ST2 comprises the most recent Sustainability Appraisal; the Site Selection Methodology; and the Spatial Strategy Background Paper (updated July 2021). It is clear in reviewing this evidence base that the aim was to create a settlement hierarchy which distributed growth amongst the tiers proportionate to their sustainability, accessibility by public transport and active travel and infrastructure capacity.
- 1.6 The settlement hierarchy places the Main Towns of Worksop, Retford, and Harworth and Bircotes top, followed by Large Rural Settlements and then Small Rural Settlements. We understand therefore that the spatial approach sets out the following proposed housing distribution:
 - Worksop – 30.3%
 - Retford – 20%
 - Harworth and Bircotes – 19.4%
 - Large Rural Settlements – 13.5%

Examination of the Bassetlaw District Council Local Plan 2020-2037

Hearings in response to the Matters, Issues and Questions (dated 7th October 2022)

Hearing Statement prepared by Savills (UK) on behalf of private landowner: Carr Family – Land to the south of Coalpit Lane, Elkesley



Matter 2 – Vision and Objectives, Spatial Strategy and Location of New Development and the Site Selection Process

- Small Rural Settlements – 16.1%
- Other Villages and Countryside – 0.66%

- 1.7 We note that the strategy recognises the importance of maintaining and enhancing the services and features of the rural area in order to sustain the vibrancy of rural settlements and the quality of life experienced by those living in such areas. This reflects the NPPF which recognises the importance of rural housing to allow villages to grow and thrive.
- 1.8 In general terms, we consider that using a tier system constitutes positive plan making as it enables the various types of settlements to be attributed to a specific category. However, given that there are 103 villages within the rural area of the district of varying sizes and with significant varying levels of access to local services and public transport, it is imperative that there are sufficient categories within the tier system to properly reflect the full spectrum of settlements and their needs within the district.
- 1.9 It is therefore important that all rural settlements are correctly categorised within the settlement hierarchy to manage growth in a positive way through allocating deliverable sites to meet their needs. The correct level of housing growth must be allocated to settlements commensurate with their size in order to help sustain a critical mass and ensure key facilities and services continue to thrive and expand what they can offer. Sufficient housing growth is also important to ensure younger generations are able to afford new homes within or in close proximity to their family and friends and to ensure such villages remain vibrant and attractive places to live.
- 1.10 It is in this context that we have reservations on the proposed settlement hierarchy and categorisation of villages, specifically with reference to the settlement of Elkesley. This is discussed in greater detail as part of our response to question 2.2, which focuses on the classification of settlements.

Question 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?

- 1.11 As previously outlined, whilst we welcome growth being directed to villages in order to maintain rural vitality, we do have some fundamental concerns with the categorisation of villages as detailed within draft Policy ST2. These concerns are outlined in further detail as follows.
- 1.12 It is understood that the categorising of villages is underpinned by the Local Planning Authority's considered 'sustainability' of these settlements to accommodate growth as detailed within the Bassetlaw Rural Settlement Study (2020 and update 2021) alongside the Sustainability Matrix. The Sustainability Matrix looks to categorise all rural settlements in Bassetlaw based on their size, facilities, and the level of service/infrastructure provision on offer. The Sustainability Matrix categorises rural settlements into three classifications and identifies proposed levels of growth for each as follows; 20% requirement for Large Rural Settlements, 5% requirement for Small Rural Settlements and 0% requirement for Other Settlements.

Examination of the Bassetlaw District Council Local Plan 2020-2037

Hearings in response to the Matters, Issues and Questions (dated 7th October 2022)



Hearing Statement prepared by Savills (UK) on behalf of private landowner: Carr Family – Land to the south of Coalpit Lane, Elkesley

Matter 2 – Vision and Objectives, Spatial Strategy and Location of New Development and the Site Selection Process

1.13 The Spatial Strategy and Rural Settlement Study are a vital element of achieving the aims of the Bassetlaw Local Plan. It is therefore important that the criteria used to establish the Settlement Hierarchy and dictate growth is robust, well evidenced and carefully considered.

Size of Village

1.14 It is important to highlight that population size could be considered as a crude estimate as it is relative to its area and should not be relied upon as the sole reason for allocating a settlement.

1.15 The table outlined below demonstrates the proposed thresholds for each level of the settlement hierarchy:

Hierarchy level	Criteria*	Lowest - Highest	Difference
Large Rural Settlement	500 or more dwellings	553 - 2575	2,022
Small Rural Settlement	50 or more dwellings	65-645	580

*the overall criteria is based on other factors in addition to number of dwellings.

1.16 It is evident from the above that the criteria of taking the number of dwellings within that settlement for both large villages and small villages creates a broad threshold. As such, the settlements identified within each of these tiers will be extremely varied and are not reflective of the scale and nature of each individual settlement. To explain this point further, to assign growth to all medium villages in the same manner i.e. a blanket 5% growth figure is not considered appropriate in this respect.

1.17 In terms of settlement sizes for large and small rural settlements (those covered by Policy ST2) we understand that the number of dwelling figures have been counted with a base date of 1st April 2018, as detailed within the Rural Settlement Study update 2021. Whilst we have reviewed the supporting evidence, there is no clear reasoning to justify why this date, in particular, has been included. In contrast, for other settlements listed in the hierarchy such as for Worksop and Retford, the base date is 1st April 2020 from which housing commitments will be counted. We therefore query why a different base date has been used. The correct start date should be consistent for all settlements and in doing so, the start date should be as up to date as possible so as to allow future growth to reflect the settlement more accurately. As such, the recently approved application for 39 units with a flexible commercial unit – (reference 20/00959/OUT) in Elkesley should be included, to correctly reflect the overall number of dwellings/ residents.

1.18 Whilst we have no objection to the use of the number of residents in a settlement as the starting point to define the appropriate tier within the settlement hierarchy, we strongly recommend that settlements are regularly reviewed, taking into account growth which is delivered throughout the plan period, to ensure they remain within the correct tier of the settlement hierarchy moving forward and throughout the plan period.

1.19 It follows that, should the number of dwellings in a settlement define its place in the hierarchy then as the settlement grows, its place within the settlement hierarchy should change accordingly. This approach will encourage growth across the Settlement Hierarchy throughout the entirety of the plan period.

Examination of the Bassetlaw District Council Local Plan 2020-2037

Hearings in response to the Matters, Issues and Questions (dated 7th October 2022)

Hearing Statement prepared by Savills (UK) on behalf of private landowner: Carr Family – Land to the south of Coalpit Lane, Elkesley



Matter 2 – Vision and Objectives, Spatial Strategy and Location of New Development and the Site Selection Process

Access to Services and Facilities

- 1.20 In addition to the size of the settlement, consideration must also be made to the extent of services and facilities that are available in each village itself, in addition to those services and facilities available in nearby villages. Consideration must be given to how such clusters of villages interact with one another also in this respect. An example of such a positive approach taken to cluster villages set out in Policy S3 within the Hambleton Local Plan whereby larger villages have a role to play in other nearby communities. In defining a settlement's access to services and facilities, the Rural Settlement Study refers specifically to a convenience store, primary school, the provision of public transport and potential job opportunities within the local vicinity. It is facilities such as these which contribute to what is considered to be sustainable development.
- 1.21 In reviewing the background documents, specifically the Rural Settlement Study and the Spatial Strategy Background Paper, we note the criteria for both the Large Rural Settlements and Small Rural Settlements, in the context of services and facilities:
- Large Rural Settlement - *"have all of the following; a primary school, doctors surgery/health centre, a community centre/hall, a convenience store, a church and a public house."*
 - Small Rural Settlement - *"have at least, one of the following facilities; a primary School, Doctors Surgery/ health centre, post office, a community centre/hall and a convenience store."*
- 1.22 In terms of the 'inventory', we note that one of the eligible large rural settlements listed within draft Policy ST2 is Blyth. This is very comparable to that of Elkesley which is currently categorised as a Small Rural Settlement. Blyth has a primary school, pub, restaurant and church and village shop and a similar population. However, like Elksley, Blyth has no known health services therefore flexibility has seemingly been applied to the criteria in this respect. In light of this, and given the obvious similarities between these two villages, it is our view that Elkesley should be upgraded to a large rural settlement.
- 1.23 In comparing the two requirements for large and small settlements in the context of services and facilities, it is evident that there is considerable differences from a village having one of the named facilities to a village having all six of the facilities. As such, there is a considerable disparity between the requirements of a small settlement and a large settlement.
- 1.24 In reviewing settlements which have been categorised as small settlements, it further highlights the disparity within the small settlement category. For example, Clayworth has a Post Office, pub and Church in comparison Elkesley which has a Primary/Nursery School, convenience store, coffee shop, pop up post office, Church, Village Hall and two takeaway/ restaurants, yet both are defined as small settlements. Elkesley also benefits from four bus services departing from High Street, which run as a rural service, providing routes to Doncaster and Retford.

Examination of the Bassetlaw District Council Local Plan 2020-2037

Hearings in response to the Matters, Issues and Questions (dated 7th October 2022)

Hearing Statement prepared by Savills (UK) on behalf of private landowner: Carr Family – Land to the south of Coalpit Lane, Elkesley



Matter 2 – Vision and Objectives, Spatial Strategy and Location of New Development and the Site Selection Process

Constraints

- 1.25 We understand that physical and environmental constraints have also been factors which have influenced the categorisation and distribution of housing attributed to settlements within the district. The Rural Settlement Study has taken into consideration 'significant constraints' to growth, with specific reference to flood risk.

Re-categorisation of Rural Settlements

- 1.26 In the event that the Council wish to retain the two settlement categories of Large settlements and Small settlements, we would respectively request that Elkesley should be re-categorised as a Large Rural settlement given the village already has a good range of key facilities and shops, and the village offers the opportunity for additional facilities in future, to meet the criteria and in the interests of effective, positive and consistent plan making.
- 1.27 Alternatively, a Medium Rural Village criteria could be introduced into the settlement hierarchy, in addition to the Large rural villages and Small rural villages categories. This additional criteria would allow for all of the 103 villages to be attributed to a specific category of villages, which allows the settlement hierarchy to better reflect the varying sizes and varying levels of access to services within the respective settlements. The method of including a medium category for villages has been implemented in other local planning authorities nearby such as Central Lincolnshire with the inclusion of large, medium and small villages to better reflect the broad range of villages within the district.
- 1.28 In terms of the level of growth attributed to Medium Rural Villages, it's considered that this would need to be somewhere in between the 20% growth attributed to Large Rural Settlements and 5% growth attributed to Small Rural Settlements.

Question 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?

- 1.29 It is imperative that the level of development proposed for both the large rural settlements and small rural settlements is not unduly restricted. In doing so, it must be recognised that new housing sites will make a contribution to meeting the overall housing targets for the area and in encouraging sustainable development more generally in rural areas.
- 1.30 It is important that rural settlements such as Elkesley are enabled to manage growth in a positive way through allocating deliverable sites to meet their specific needs and to help sustain the critical mass of residents. Moreover, this will ensure facilities and services continue to thrive and expand as they have already done so as a result of the Neighbourhood Plan.

Examination of the Bassetlaw District Council Local Plan 2020-2037

Hearings in response to the Matters, Issues and Questions (dated 7th October 2022)

Hearing Statement prepared by Savills (UK) on behalf of private landowner: Carr Family – Land to the south of Coalpit Lane, Elkesley



Matter 2 – Vision and Objectives, Spatial Strategy and Location of New Development and the Site Selection Process

- 1.31 It is considered that growth in villages should not be overly restricted. Should the LPA consider the current approach to be a suitable option for growth, the 5% cap should be regarded as a minimum figure for growth and not a maximum. This suggested approach is considered to be in accordance with paragraph 79 of the NPPF.
- 1.32 In respect of the proportions of developed proposed, it is our understanding that previous iterations of the Local Plan attributed 20% growth to all villages (i.e. both Large and Small). Within the Publication Draft, it is evident that villages categorised as Small Rural Settlements have now been restricted to growth at 5%. There appears to be no justification for this proposed reduction in growth for small rural settlements. A more flexible and effective policy is recommended in this respect which should take into account each individual settlements circumstances. In doing so, some villages may be attributed a figure closer to say 15% growth whilst others may be more suited to 5% growth. This would be in contrast to the blanket approach of a choice between either 20% or 5% growth.

Question 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?

- 1.33 Currently, there are 27 settlements with development boundaries within the Core Strategy. This includes the village of Elkesley. The Development Boundaries Background Paper (September 2021) states “*it is not necessary to review all of these as the approach to development in the rural area is being reviewed in the Bassetlaw Local Plan*”. As such, it is our understanding that settlements listed within the Development Boundaries Background Paper, (a to h), are the only settlements which are subject to a development boundary review. Having reviewed the methodology for this approach, it seems as though the development limits will be drawn tightly around settlements, including the exclusion of areas of public open space on the edge of the existing built up area, and excluding proposed development allocations.
- 1.34 We note however that the development boundaries for settlements not listed in (a to h) can be designated through made Neighbourhood Plans, where appropriate. In the context of Elkesley, this therefore allows for a mechanism to pursue a development boundary review moving forward, given Elkesley has an adopted Neighbourhood Plan.
- 1.35 It is worth setting out the approach taken by other local planning authorities as a comparison in respect of the approach towards settlement boundaries. Recently adopted local plans such as Hambleton (2022) and Barnsley (2019) have moved away from strict development limits, with Hambleton removing them entirely, and Barnsley having settlement boundaries which are not intended to limit development as explained at paragraph 5.10 of the Barnsley Adopted Local Plan and reflected in the associated Policies Map.
- 1.36 Given the above, a review of all the development limits is recommended to ensure that they are up to date and development can come forward on sites which are not allocated, as appropriate. An alternative approach would be the removal of settlement boundaries altogether. This would retain an element of flexibility in the sites delivered, allowing delivery to reflect market needs. Such sites would still be subject to the wider local plan policies in respect of spatial growth and the usual development management considerations therefore the LPA should take comfort in this respect. This approach is supported by Paragraph 68(c) of the NPPF.

Examination of the Bassetlaw District Council Local Plan 2020-2037

Hearings in response to the Matters, Issues and Questions (dated 7th October 2022)

Hearing Statement prepared by Savills (UK) on behalf of private landowner: Carr Family – Land to the south of Coalpit Lane, Elkesley



Matter 2 – Vision and Objectives, Spatial Strategy and Location of New Development and the Site Selection Process

Question 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?

- 1.37 Whilst we support the addition of part 3 part b) to allow flexibility in the absence of Neighbourhood Plans. We would however draw attention to the wording of part a), which highlights the reliance on a Neighbourhood Plans for additional housing development above that prescribed within the policy. Such a requirement would mean that we would be inadvertently tied into a new Neighbourhood Plan which could take between 2-3 years to develop and adopt. We would therefore highlight that support by residents and Parish Council would be sufficient to allow additional growth in absence of the resources and timeframe to deliver a new neighbourhood plan and to ensure urgent needs are met. Such policies are commonplace in plan making for example with South Kesteven's policy SP4 adopted 2020 which largely mirrors what is being suggested.

Conclusion and Recommendations

- 1.38 The thrust of this Hearing Statement is to share the specific concerns we have over policies ST1 and ST2 in far as the categorisation of rural settlements, with specific consideration to Elkesley and the reduction of housing growth attributed to the sustainable small rural settlements as a consequence.
- 1.39 We set out our recommendations on the Draft Local Plan as follows.

Recommendation 1

- 1.40 As detailed within our response to question 2.2 we believe that there should be a re-categorisation of Rural Settlements as below:
- Option A: Elkesley to be moved up the settlement hierarchy and be recognised as a Large Rural settlement which affords 20% growth given the facilities and shops within the village. In the interests of justified, positive and effective plan making; or
 - Option B: a Medium Rural Village criteria could be introduced into the settlement hierarchy, in addition to the Large rural villages and Small rural villages categories. This would allow the settlement hierarchy to better reflect the varying sizes and varying levels of access to services within the respective settlements.

Recommendation 2

- 1.41 Within Policy ST2, we recommend the removal of reference to a 'cap' of % in favour of 'minimum' percent in the interests of positive and compliant plan making. A more flexible and effective policy would be take into account each individual settlements circumstances. In doing so, some villages may be attributed for example 15% growth whilst others may be more suited to a figure closer to 5% of growth.

Examination of the Bassetlaw District Council Local Plan 2020-2037

Hearings in response to the Matters, Issues and Questions (dated 7th October 2022)

Hearing Statement prepared by Savills (UK) on behalf of private landowner: Carr Family – Land to the south of Coalpit Lane, Elkesley



Matter 2 – Vision and Objectives, Spatial Strategy and Location of New Development and the Site Selection Process

Recommendation 3

- 1.42 In respect of development limits it is recommended that a review is undertaken to ensure that they are up to date and development can come forward on sites, as appropriate. An alternative approach would be the removal of settlement boundaries altogether. This would retain an element of flexibility in the sites delivered, allowing delivery to reflect market needs.

Recommendation 4

- 1.43 With specific consideration to Policy ST2, part 3 a), such a requirement would mean that we would be inadvertently tied into a new Neighbourhood Plan which could take between 2-3 years to develop and adopt. We would therefore highlight that support by residents and Parish Council would be sufficient to allow additional growth in absence of the resources and timeframe to deliver a new neighbourhood plan and to ensure urgent needs are met.