

# **Bassetlaw Local Plan Examination in Public**

Matter 2, Issue 2

Statement on behalf of Hallam Land Management  
Ltd and IBA Planning

## INTRODUCTORY STATEMENT

- i. Hearing Statements are submitted by Christopher Waumsley DipTP MRTPI of Inovo Consulting supported by David Lock Associates Ltd on behalf of Hallam Land Management and IBA Planning (hereinafter referred to as HLM/IBA), promoter of land at **Peaks Hill Farm, Worksop** for which a draft allocation is made under Policy 16:HS1 of the *Bassetlaw Local Plan Submission Version July 2022*.
- ii. Hallam and IBA control and are promoters of land at Peaks Hill Farm Worksop which is proposed as a strategic mixed use allocation in the draft plan. The intention is to provide a sustainable urban extension to the north of Worksop incorporating strategic green and grey infrastructure, most notably a new East West link road to serve the town from the A60 (Carlton Road West) to the A6045 (Blyth Road).
- iii. Hallam and IBA have been positively engaged with the Policy Team, and more latterly, Development Management Team at Bassetlaw since 2019 and throughout the evolution of the local plan.
- iv. For context a summary of activity and engagement undertaken to date in respect of the proposed allocation site is set out below:
  - a) An initial development concept for a sustainable urban extension at Peaks Hill Farm was prepared in July 2020, worked up in conjunction with the planning authority and proposing a broad vision and overall objectives for development. This concept plan informed the preparation of technical survey and assessment and was subject to public and stakeholder engagement alongside the November 2020 Local Plan consultation.
  - b) Responses to that consultation exercise and engagement with key officers, stakeholders and consultees in the period since has resulted in the evolution of the concept plan into a draft Development Framework which was subject to a second round of stakeholder engagement in Feb 2022 and is currently the subject of pre-application discussions. The Development Framework is intended to govern the submission of an outline planning application, design coding and detailed applications for infrastructure and development in accordance with local plan policy objectives set out in Policies ST56 and ST58 and referenced in paras 12.3.4-5 of the draft Plan.
  - c) Alongside this work the promoter's consultant team have carried out a wide range of assessments and studies to allow the identification of the technical considerations pertinent to the site's development. This technical information has informed the preparation of a draft outline planning application for the site's development. As part of that process an EIA screening opinion was submitted in February 2022, a subsequent EIA scoping opinion received March 2022 and a formal pre application submission was made in August 2022.

- d) Taken together, the EIA outputs and the feedback from stakeholder and officer consultation has allowed mitigation to be designed into the masterplan; the likely infrastructure requirements arising from the development to be confirmed; and has provided a greater degree of detail - and therefore certainty – over the nature and quantity of development and infrastructure to be delivered on site.
- v. Hallam and IBA are appearing at the Examination in support of BDC’s commitment to an urban extension north of Worksop to meet the needs of the plan area within the plan period to 2038. Those needs have been assessed in the evidence base and are articulated in the plan (in particular in Policy 16: HS1). The allocation of an urban extension at Worksop represents a spatial growth solution which is aligned with the overarching Vision and Objectives of the Plan – and will ensure outcomes which ensure effective delivery of Plan objectives.
- vi. In response to the Inspectors’ *Part 1 Matter, Issues and Questions (MIQ)* issued on xxx October 2022, HLM/IBA wish to make a number of points to supplement the representations made by Inovo at the Regulation 18 state consultation and the Regulation 19 stage consultation of the *Bassetlaw Local Plan (BLP)*.
- vii. Our Hearing Statements provide clarification of our clients’ position to assist the Inspectors in consideration of their questions posed to the Council in the *Matters, Issues and Questions*. As part of the review of the evidence base published since the submission of the Plan, technical evidence and input to these Statements has been provided by:
- FPCR (master planning, arboriculture and ecology);
  - ADC Infrastructure (highway design); and
  - Rodgers Leask Ltd (drainage)

## **MATTER 2 – VISION AND OBJECTIVES, SPATIAL STRATEGY AND LOCATION OF NEW DEVELOPMENT, AND THE SITE SELECTION PROCESS**

**(Policies ST1 and ST2)**

**Issue 2 – Are the provisions of the Plan in relation to the Spatial Strategy & Location of New Development justified and consistent with national policy?**

***Q2.1: 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?***

- 1.1 HLM/IBA consider that the provisions of the Plan in relation to the spatial strategy and location of new development are justified and consistent with national policy. The Vision and Objectives of the plan prioritises the provision of high quality jobs and homes in locations which promote healthy and active lifestyles whilst reducing carbon-generating activities – very much at the heart of both the NPPF and the current national priorities for planned growth and investment. This objective is reflected in both the proposed spatial strategy and the focus on proposing mixed use development within strategic allocations in sustainable locations.
- 1.2 Specifically in respect of the translation of the Vision and Objectives into the spatial framework, we anticipate the first part of question 2b (settlement hierarchy) will be answered by the planning authority. However, we make the following comments in support of the Council's effective translation of Vision and Objectives to spatial framework:
- (i) Focusing strategic growth at Worksop- the principal town in the District - appropriately recognises the role that the town already plays as a centre of population and provision of services and facilities, and that new well-planned growth can *align "economic growth with the housing offer"* (para 5.1.9), reducing outmigration and maximising the opportunity for a move to a more sustainable patterns of movement and living, which not only meets Local Plan objectives but also that of the D2N2 LEP's Recovery and Growth Strategy;
  - (ii) Selecting strategic allocations in sustainable locations at the larger towns - such as at Peaks Hill Farm north of Worksop – which because of their scale are capable of delivering strategic infrastructure alongside new growth, will (a) ensure that new development is

supported by new on-site infrastructure (such as schools, local centre and shops) to minimise impact on existing services and facilities, and (b) unlock whole-town benefits for both existing and new residents and workers (the B6045 Blyth Road to A60 Carlton Road link, for example), improving the economic resilience and social wellbeing of places.

- 1.3 We consider that the spatial strategy - comprising c.70% of growth at the Main Towns, with the remaining 30% distributed elsewhere within the District to support the resilience of rural settlements - is an appropriate distribution strategy which balances the need for growth of larger sustainable urban with providing a good range of housing and employment choice to meet the wide range of housing and employment needs across the district to 2038.

***Q2.2: 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?***

- 1.4 It is anticipated that this question will be addressed by the Planning Authority.

***Q2.3: 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?***

- 1.5 It is anticipated that this question will be addressed by the Planning Authority.

***Q2.4 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?***

- 1.6 It is anticipated that this question will be addressed by the Planning Authority.

***Q2.5 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?***

- 1.7 It is anticipated that this question will be addressed by the Planning Authority.

***Q2.6 Have the sites allocated for development in the plan been appraised and selected in comparison with possible alternatives using a robust and objective process?***

- 1.8 We consider that this question will be addressed primarily by the Planning Authority in respect of the sustainability appraisal of both the spatial strategy options and the site-specific SA.

- 1.9 We note the SA of the Peaks Hill Farm allocation (set out in para 6.109-6.118 of the SA dated May 2022). We consider this assessment has been undertaken in a robust and objective manner and do not disagree with the commentary or assessment conclusions therein, as reflected in para 5.1.41 of the draft Plan.

***Q2.7 Are the plan's assumptions in relation to the amounts and timing of development to be delivered through neighbourhood plans and the Worksop Central Development Plan soundly based?***

- 1.10 It is anticipated that this question will be addressed by the Planning Authority.

***Q2.8 Are policies ST1 and ST2 otherwise justified and consistent with national policy? Are there any omissions in the policies and are they sufficiently flexible?***

- 1.11 We support the justification and wording of Policies ST1 and ST2 as currently drafted, and consider that they are consistent with national policy. The policies are clear in their objectives and set out in a transparent manner how the growth needs of the District are to be met to 2038.

***Q2.9 Do the vision and objectives of the plan adequately address matters of climate change and air quality?***

- 1.12 It is anticipated that this question will be addressed primarily by the Planning Authority. However, it is clear that one of the drivers for the spatial strategy is the location of new growth at locations which benefit from existing infrastructure and services within close proximity to facilitate short (non car) journeys, and to seek a rebalancing of the net outcommuting from the District to reduce the overall need to travel, thereby positively impacting vehicle emissions and air quality.
- 1.13 In addition, site specific policies include criteria to enable the delivery of development which incorporates requirements designed to provide enhancements in biodiversity, flood resilience, and provision of high quality and usable green infrastructure.

***Q2.10 Are the Council's proposed modifications to the policies necessary for soundness?***

- 1.14 It is anticipated that this question will be addressed by the Planning Authority.