

WRITTEN STATEMENT IN RESPECT OF THE BASSETLAW LOCAL PLAN 2020 – 2038 EXAMINATION MATTERS 9 AND 10: VISITOR ECONOMY/CHARACTER AND DISTINCTIVENESS

INTRODUCTION

- 7.21. This Written Statement is made by Planning & Design Group (P&DG) 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. This particular statement is submitted in response to Matter 9: the Visitor Economy.

MATTER 9: VISITOR ECONOMY

ISSUE 9 – DOES THE PLAN SET OUT A POSITIVELY PREPARED STRATEGY AND POLICIES FOR RETAILING AND TOWN CENTRES AND THE VISITOR ECONOMY WHICH IS JUSTIFIED, EFFECTIVE AND CONSISTENT WITH NATIONAL POLICY?

Q9.1 – Would Policy ST12 be effective in supporting tourism development whilst protecting the built and natural environment?

- 7.22 The previous representations. P&DG support the principle of an overarching policy when applicable to the bulk of tourism development in the Local Plan area; however the policy continues to not distinguish the exceptional qualities and contribution that the Welbeck Estate makes towards the tourism offer. As such, our previous representations submitted during the sequence of the Local Plan continue to be of pertinence. We are not satisfied that the Bassetlaw Local Plan has duly responded or fully evidenced why a site specific policy for the Welbeck would not be sound, particularly given such a parity exists with the made Cuckney, Norton, Holbeck and Welbeck Neighbourhood Plan in this regard to support the role of the Estate. The policy would need to apply to the estate as a whole, including Carburton and the area encompassing Creswell Crags for the purpose of the visitor economy.
- 7.23 The suggested wording for the proposed policy as submitted is as follows:
“The District Council will work with the Welbeck Estate and other partners to:
 • ***Support the diversification of land uses across the site encompassing opportunities for tourism, economic development, leisure and accommodation, limited housing where permitted by the other policies of the Local Plan and community uses;***
 • ***Support the diversification of land uses on the site that deliver the objectives of the Local Plan for both the rural and visitor economies;***
 • ***Encourage the development of businesses and companies locally which harness the education potential of the Welbeck Estate or local community, and secures the long-term future and positive redevelopment of heritage assets; and***
 • ***Ensure that new development, where permitted by this policy, does not prejudice other policies of the Local Plan.”***
- 7.24 P&DG has no comments to make in relation to the other questions of Matter 9 regarding retail and town centres.

MATTER 10: CHARACTER AND DISTINCTIVENESS

INTRODUCTION

- 7.25 This Written Statement is made by Planning & Design Group (P&DG) on behalf of our clients, The 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. This particular statement is submitted in response to Matter 10: Character and Distinctiveness. The following questions are answered collectively:

Q10.4 a) Would ST40 provide an effective framework to protect and enhance the biodiversity and geodiversity of the District? Is it justified by robust evidence including on viability?

Q10.4 b) Are the potential impacts arising from development proposed in the plan on Clumber Park SSSI adequately addressed?

Q10.4 c) Are the proposed main modifications to Policy ST40 and the supporting text necessary to make the plan sound?

- 7.28 We continue to have reservations as to how this policy is fully evidenced including whether this has fully satisfied viability testing particularly small and medium sized developments and those in the context of the conversion of historic buildings and heritage at risk.
- 7.29 P&DG continue to disagree with the proposed wording of policy ST40 on account that it does not account for circumstances where mitigation may already be included, even accounting for the proposed main modification. This statement is not sufficiently proactive in supporting where proposals have made conscientious efforts to mitigate the any direct or indirect impacts and these should be explained further after 'wholly exceptional circumstances'. Paragraph 180 b) of the National Planning Policy Framework (NPPF) explains the exception more clearly where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest. The policy should be reworded in conformity with the NPPF to ensure soundness.
- 7.30 When concerning residential development of 50 or more dwellings the policy continues to not provide any cover for the instances where a HRA concludes that such mitigation would not be required, or if mitigation has already been made possible in the vicinity. To be considered sound, the policy wording should only require site specific mitigation to be in a position to negotiate if required. This includes the requirement to mitigate financially against development within the Clumber Park SSSI buffer zone, again if development in the vicinity is already seeking to divert the amenity offer away from Clumber at other tourism and visitor facilities in the area.



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