

BASSETLAW LOCAL PLAN 2020-2038
PUBLICATION VERSION SECOND ADDENDUM
– REGULATION 22
LOCAL PLAN EXAMINATION

RESPONSE TO MATTERS, ISSUES AND QUESTIONS
Matter 10 – Local Character and Distinctiveness

On behalf of William Davis Homes in relation to land
north of Mansfield Road, Worksop


November 2022

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Revision	Author	Checked by	Date
A	SS	NG	04.11.2022



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Client

William Davis Homes

Our Reference

WDH-001-D

10. Matter 10 – Local Character and Distinctiveness

Issue 10 – Does the Plan set out a positively prepared strategy and policies for local character and distinctiveness which is justified, effective and consistent with national policy?

(Policies ST35 thru ST42)

10.3 **a) Is the approach taken by policy ST38 consistent with the Framework and the aims of sustainable development? In relation to the location and extent of Green Gaps, are these supported by robust and up to date evidence?**

Policy ST38 *Green Gaps* looks to preserve the local character and distinctiveness of the Main Towns and nearby Large and Small Rural Settlements, and to reflect the sensitivity of the adjoining landscape quality and character. The designated Green Gaps are shown on the Policies Map.

The policy is drafted based on the conclusions of The Bassetlaw Green Gaps Report 2019 and the Green Gap Addendum Report 2020, which each ensure that the policy is consistent with the recommendations of the Land Availability Assessment Report (landscape-based review of 27 sites) and the conclusions of the Review of the 2009 Landscape Character Assessment.

The Green Gap Report (November 2019) indicates that towns and larger villages within Bassetlaw have experienced substantial development and leads to the potential for them to merge in the future.

The Green Gaps Report Second Addendum (April 2021) is clear in stating that the Green Gaps policy approach is to enable the District Council to use the new Local Plan to safeguard the characteristics of areas of “important landscape” around more sensitive locations,

Policy ST38 suggests that the Green Gap serves two functions; to prevent towns from merging and protect valued landscape character. The way in which the policy reads these two functions are not considered synonymous. However, it is suggested that the wording of other policies (including ST1, ST35 and ST37) are strengthened in order to protect valued landscape character which leaves the sole objective of Policy ST38 to maintain the separation of settlements.

Otherwise, the designation of the Green Gap itself becomes superfluous to other policies proposed for the control of development in the countryside.

The Green Gap Report identifies commercial and residential development around Shireoaks and Rhodesia as an example of erosion of local landscape character between settlements (Page 15).

Green Gap 4 (GG4) is identified on the Policies Map covering land between the western edge of Worksop and the villages of Shireoaks and Rhodesia. GG4 reserves a large portion of the subject site allocated under Policy ST38 *Green Gap*, to the west of the St Anne's residential estate on the western edge of Worksop.

The first iteration of the Site Allocations: Landscape Study in 2019 examines a total of 27 potential site allocations within the emerging Local Plan, and provides a summary profile setting out landscape issues, constraints, and opportunities.

The Site Allocations: Landscape Study (2019) includes an assessment of the whole site reference LAA206 (Site 14H) for a proposed residential use. The assessment concludes that that the site does not have a relationship with the potential Green Gap, and that there is scope for a more limited development adjoining recent housing (i.e. St Anne's estate to the immediate east). Further, there remains no consistency between how the site has been assessed from a landscape and visual perspective.

Regardless of these conclusions, it is still maintained that the Site Allocations: Landscape Study (November 2019) does not follow acknowledged guidance on assessing landscapes and this is required to ensure consistent observations between baseline assessments and conclusions between all of the assessed sites.

This exercise should be undertaken in accordance with GLVIA3 to inform the conclusions set out in the supporting evidence, and our objection to the allocation of the northern part of the site at Mansfield Road, Worksop, is sustained.

The reasoning for GG4 to prevent Worksop and Rhodesia combining is justified and therefore, the principle of the policy itself is supported. However, the development of the whole of the subject site would maintain the existing distance between the urban edges of the two

settlements and would not make any contribution to the closure of a perceived gap. Therefore, it is considered that GG4 in its current alignment is unjustified, and the supporting evidence used to prepare this is unsound.

The justification for GG4 covering much of LAA206 is not considered sufficiently justified against the function of the Green Gaps. As set out within Urban Wilderness representations to the Publication Version (August 2021) consultation, the sensitivity of land effectively within LAA206 has been determined as being Moderate landscape sensitivity and as such, has some capacity for change. Consequently, the footpath boundary doesn't deliver an adequate boundary if land both to the north and south are considered to comprise the same landscape sensitivity.

Moreover, its inclusion resulting in a negative evaluation of the site as a potential allocation is similarly unjustified given the Council's previous stance on the same piece of land within the Site Allocations DPD having no material change to the site and its context in landscape terms.

The Land Availability Assessment Appendices (May 2022) dissects the site into two areas. Whilst there is no clear justification to separate the site, the northern area referenced LAA206 is taken forward for consideration within the Sustainability Appraisal (latest version dated May 2022). However, the LAA Appendices note that LAA549 could be a suitable alternative but is not considered independently.

As such, as a potential site option LAA549 should be considered independently as a suitable alternative for housing delivery. The local planning authority should at the minimum consider the alternative site option LA549 in complete isolation (the southern part).

The GG4 allocation itself covers a large proportion of the LAA206 and whilst the policy wording does not in itself entirely preclude future development, the development of LAA206 would create a better and more defined northern boundary to ensure the gap between settlements is maintained in the longer term, rather than relying on a footpath as suggested within the GG Report.

There is no objection from William Davis Homes to the general principle of using a Green Gap style policy within the new Local Plan. However, there remains significant objection to GG4 and the way in which the designation is drawn, and this is based on the supporting evidence used to prepare it.

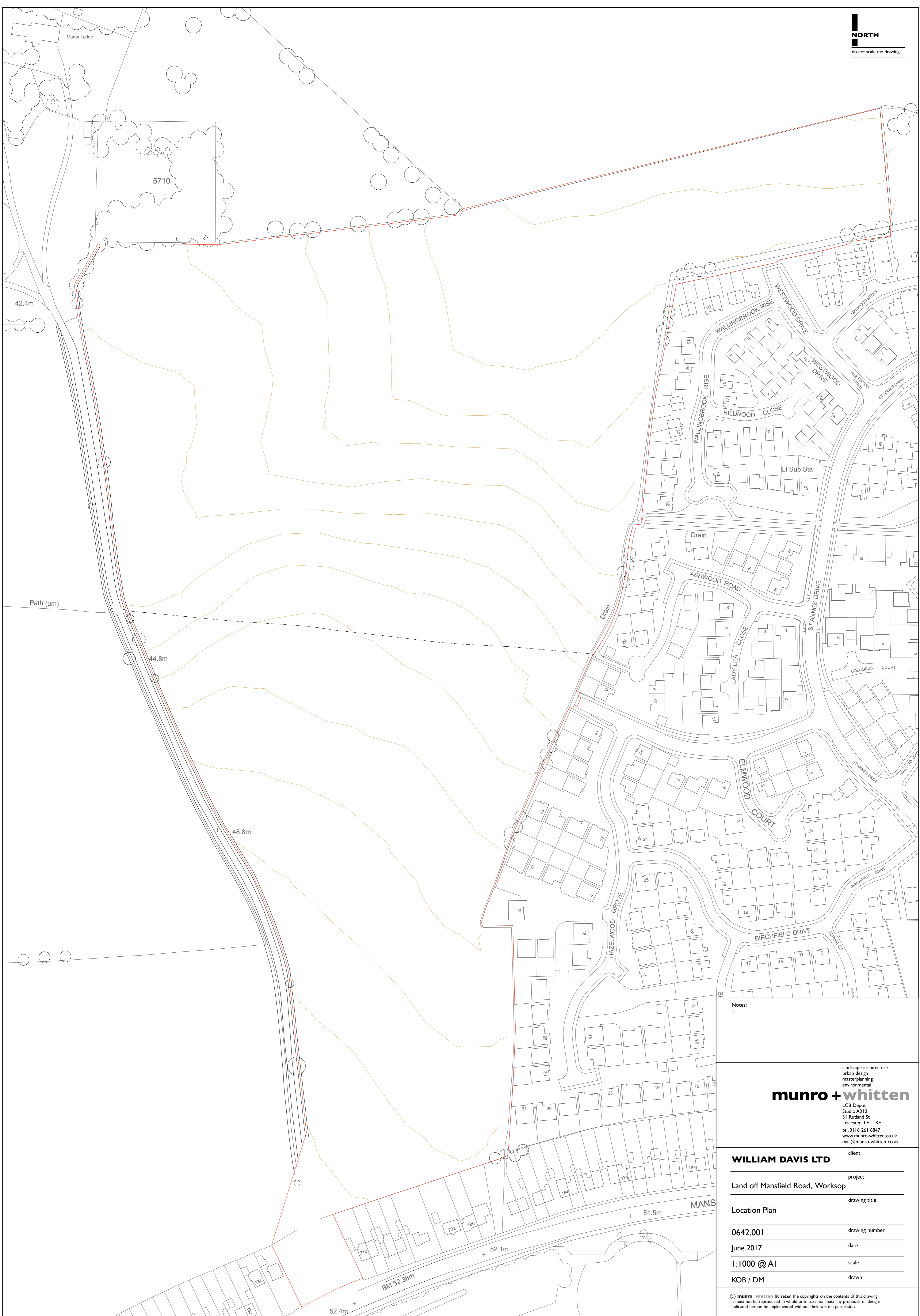
Our comments and objections remain as summarised below:

- 1) There remains inconsistency between the assessment of the site across the evidence base documents in the assessment of the subject site;
- 2) The Site Allocations: Landscape Study (November 2019)
 - Lacks a clear methodology;
 - does not meet evidence required by national planning policy
- 3) Green Gap Report (November 2019)
 - Requires boundaries to be clear, long term and defensible but then uses a footpath in an open field which is not clear, defensible or recognisable on the ground;
 - The assessment at page 26, fails to set out the value of the landscape and simply lists observations and document-based findings and does not analyse, test and score them as required by the GVLIA3 (Box 5.1)
 - Incorrectly states that the site has no potential for an allocation within the emerging Local Plan. Other evidence base documents (e.g. LAA and SA) indicate that at least the southern area of the site could be suitable;
 - The Notable Views statement does not draw upon nor matches the Landscape Study findings;
 - Fails to draw upon all relevant assessments and recommendations especially the 2009 LCA.
- 4) Site reference LAA549 should at a minimum be fully assessed and considered independently as a suitable alternative for housing delivery as set out within the Land Availability Assessment (May 2022). This is not carried forward into the SA;
- 5) Amendments are required to the proposed planning policy map to address the issues associated with emerging Local Plan policies GG4 and ST38;
- 6) If the green gap policy is to remain, propose a less prohibitive list of appropriate development, allowing the consideration of proposals on a case by case basis, against the established objectives.
- 7) It is suggested that to avoid confusion the wording of other policies (including ST1, ST35 and ST37) are strengthened in order to protect valued landscape character which leaves the sole objective of Policy ST38 to maintain the separation of settlements.

As set out in previous rounds of consultation, William Davis Homes continue to have significant objections to the designation of GG4 and in its current format is unjustified. Policy ST38 as a whole is therefore considered to be unsound for reasons set out above.

The Council should bring forward site LAA206 on the edge of Worksop as an allocation to reduce the risk of future under delivery as part of Local Plan policy HS15. This development site is deliverable and has a reliable housing developer ready to bring the site forward.

Enclosure 1: Site Location Plan



Notes:
1.

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WILLIAM DAVIS LTD	client
Land off Mansfield Road, Worksop	project
Location Plan	drawing title
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KOB / DM	drawn

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