

Bassetlaw Local Plan Examination in Public

Matter 14, Issue 14

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 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 14 – INFRASTRUCTURE AND DELIVERY AND MONITORING

(Policies ST56 - ST58)

Issue 14 – Does the Plan set out a positively prepared strategy and policies for infrastructure, delivery and monitoring which is justified, effective and consistent with national policy?

- 1.1 Based on the available evidence supporting the Plan, we consider that it does provide an positively prepared strategy and suite of policies which will enable the effective identification and delivery of infrastructure in line with national policy.
- 1.2 Our response on this matter is made with reference to the Peaks Hill Farm draft allocation and we do not offer any commentary on the developability or deliverability of infrastructure requirements relating to other sites.

Q14.1:

(a) Does Policy ST56 provide an effective framework to ensure the delivery of the necessary infrastructure? In particular, is the requirement to safeguard the land to deliver area-wide or site-specific infrastructure justified and consistent with national policy? Would the policy be effective particularly with regard to enabling the delivery of future transport schemes?

- 1.3 In respect of land at Peaks Hill Farm, Policy 16 identifies a number of specific infrastructure requirements which are to be delivered as part of the urban extension. Most notable is the need to deliver a new road link between the B6045 and the A60 through the site. The draft Policies Map shows an indicative extent of land to be safeguarded for the new road, as referenced under Policy ST56.
- 1.4 Whilst the Policies Map or Policy 16 does not define or quantify a precise land area which might be required to deliver the distributor road, the criteria set out within Policy 16 (i to iv) do specify the nature of the road link to be delivered.
- 1.5 Because of the advanced nature of the masterplanning and draft application for this site, the policy requirements (and land required) for the design of the distributor road has been tested and designed into the site masterplan in line with clause 2 of Policy ST56. Whilst because of the site's topography, the area of land required for the road and associated engineering is wider than the indicative area shown on the Policies Map, it is helpful for clarity to include a spatial reference on the Policies Map to indicate the location and extent of this piece of infrastructure, which when built will provide a town-wide infrastructure benefit as well as providing access to the urban extension.
- 1.6 We therefore consider Policy ST56 to be effective in this regard.

b) Are the policy's requirements supported by up-to-date evidence?

1.7 We can confirm that in respect of Peaks Hill Farm that the policy's requirements are supported by up to date evidence of design and delivery, provided through pre-application discussions on the draft outline application for the urban extension and distributor road. General arrangement plans for the distributor road have been shared with the planning authority as part of these discussions which accord with the routeing as shown on the Policies Map.

c) Have the implications of the policy in relation to viability been appropriately tested?

1.8 In relation to Peaks Hill Farm, an indicative cost for the infrastructure associated with the urban extension is provided within the Infrastructure Delivery Plan Update (page 25-6). The distributor road is expected to be funded and delivered directly by the developer (@ £8M cost), with phased delivery alongside each stage of development through agreement with the County Council.

1.9 Whilst the precise mitigation, costs and timing of infrastructure and service provision will have to be determined through s106 negotiations on a planning application, it is considered that the costs as set out in the IDP provide a reasonable set of assumptions for local planmaking purposes. In terms of viability, provided that the phasing and sequencing of infrastructure agreed through the outline planning consent does not adversely impact project cashflow, then the high level costs identified in the IDP do not represent an undue burden which would call into question the site's viability for the quantum of development allocated.

d) Is the policy sufficiently flexible?

1.10 In respect of Peaks Hill Farm and the B6045 - A60 distributor road, Policy ST56 and Policy 16 are relatively prescriptive. However, given that the road is to be brought forward as an integral part of the urban extension and delivered by the master developer alongside built development, this does not present a problem in terms of effective policy and provides a good degree of clarity and certainty to local communities and stakeholders.

1.11 On that basis we are content that Policy ST56 as currently drafted can be considered sound.

e) Are there any omissions from the proposed policy and supporting text?

1.12 We do not consider that Policy ST56 requires amendment.

Q14.2:

(a) Are the requirements for the provision of digital infrastructure in Policy ST57 justified, would they be viable and does the policy provided an effective framework to deliver this infrastructure?

(b) Is the suggested main modification necessary for soundness?

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

Q14.3:

(a) Are the requirements of Policy ST58 clear, justified and consistent with national policy? Would they be effective?

1.14 We support Policy ST58, in that it sets out a clear expectation of what will be required to accompany proposals for allocated sites to ensure coordinated delivery of development and infrastructure.

1.15 Whilst some of this information is only likely to be agreed or confirmed through the consideration and determination of development proposals and applications, it is helpful for a policy to set out clearly what information is expected to be submitted for consideration.

(b) Is there robust and convincing evidence to demonstrate that the Policy's provision not to charge CIL on developments of over 50 dwellings, justified by robust evidence? Would this secure the necessary infrastructure to support the development proposed in the Plan? Would this approach adequately address the cumulative impacts of development?

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

1.17 However, our extensive experience of delivering strategic development indicates that once a scale of development is reached whereby the provision of mitigation and infrastructure to serve the needs of the development is required on-site, s106 agreements are more effective in ensuring timely delivery of that infrastructure than CIL. If cumulative impacts are fairly and reasonably related to the development site in question, then s106 obligations to wider infrastructure improvements are just as effective a way of securing contributions to wider mitigation.

1.18 Whether a threshold of 50 units is appropriate is for the Council to evidence.

(c) Is sufficient clarity provided with regard to the review mechanism?

1.19 We welcome the reference in policy to the Council's willingness to consider review mechanisms for s106 agreements for strategic sites; this can be an effective mechanism to ensure that development of strategic or phased sites does not stall in the event that the requirements or costs for one aspect of infrastructure or impact mitigation change materially during the delivery period of a development.

1.20 The policy provides sufficient rationale for when such review mechanisms might be considered to be built into s106 agreements.

(d) Is the policy sufficiently flexible?

1.21 There appears to be an appropriate balance between certainty and flexibility within the policy as currently drafted.

(e) Are there any omissions from the proposed policy and supporting text?

1.22 We have not specific response to make on this point.

(f) Are the suggested main modifications to the supporting text necessary for soundness?

1.23 We have not specific response to make on this point.

Q14.4 Is the plan sufficiently clear as to how its implementation will be monitored?

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