

## **JUNE 2022 BASSETLAW EMERGING LOCAL PLAN (BELP) CONSULTATION RESPONSE**

This version of the BELP scrubs the Bassetlaw Garden Village. This consultation response focusses on the Policies ST1 and ST2 but wishes to reiterate all previous consultation responses on behalf of R. Troop and Son (by Danielle Troop).

### **1. Figure 6 Key Diagram**

This diagram scrubs the Garden Village and requests feedback. The removal of the garden village at Apleyhead is welcome but the *failure* to allocate additional housing to Rural Service Centres is **NOT JUSTIFIED**. In the LDF, Everton is currently a Rural Service Centre with previous iterations of the BELP proposing first a cluster model and then 20% growth – yet now we are down to a 5% cap? This is politics not sustainability concerns. Members were seeking to have their cake and eat it with the Garden Village proposal – healthy housing numbers/new homes bonus in an under-developed district - with no complaining neighbours threatening to vote Lib Dem. Hence the slashing of numbers to Rural Service Centres, soon to be known as “small villages.”

*“Garden Village employment provision was part of a sustainable strategy for the new settlement so the loss of employment provision at this site, does not require re-provision elsewhere”*

(!! 2.6 Icen Housing and Economic Needs Assessment 2022 pg4)

IE: The previous iteration of the BELP, was not positively prepared

Fig 6 shows the lop-sided spread of “Large Villages” – 60% are in the west of the district and “clumped”. How can Blyth, Langold and Carleton fulfil the role granted to them in the text when they are so very close together? They are not providing services to a rural hinterland because the “surrounding villages” are absent. The settlement hierarchy conflates regeneration desires with spatial function leaving much of the district without the ability to GROW or EVOLVE a new service centre:

- A. Carleton is a former pit village
- B. Langold is a former pit village
- C. Blyth is a former A1 coaching town that without the benefit of Bawtry’s east west connections (the A631) – stayed small but with UNDERUSED grand buildings
- D. Tuxford – as with Blyth
- E. Misterton is a former heavy engineering locale (Newells) of the Marshalls era/beginning last century – based close to the Trent with much of the Newells site still derelict. It benefits West Stockwith and possibly Walkeringham but is otherwise remote and not even on an A road.

**As identified above, the Spatial Strategy delivers SO4 NOT SO5 and is not consistent with national policy – OBJECTION.**

Recognition of Harworth’s runaway success owing to its east west strategic location alongside north south (like Bawtry), is welcome, at 5.1.3 of the spatial strategy: “3 main towns of Worksop, Retford and Harworth” – highlighted in yellow. However, the BELP should be open ref: its desire to regenerate former industrial and coaching settlements (SO4) *in addition to* retaining the current

Rural Service Centre model (which *is* spatial) – SO5. Housing allocations should go to both because the proposed 5% cap on current Rural Service Centres to 2038, is too small to be sustainable.

**The current spatial strategy (ST1) is lop-sided/west focussed, ignores current Rural Service Centres, is not sustainable, is not justified, fails to comply with 5.1.1/SO5 and merits OBJECTION.**

NB: Lincolnshire Councils have not signed at 2.7 pg9 Duty to Co-operate. Easterly relations are not covered by Bassetlaw Council, unlike by many in the district (particularly those seeking access to Grammar Schools).

## **2. Sustainability**

The LUC Bassetlaw Sustainability Report *consistently* rates the proposed settlement hierarchy highly (POLICY ST1) whilst failing to recognise that without the previous cluster model or enhanced Rural Service Centre status; villages with latent demand like Everton, will remain reliant on passing trade for our pubs and school. Without meaningful housing allocations, the additional services won't come. At 5.1.5 the word "sustainably" is highlighted in yellow as a means to question whether the larger settlements in the Bassetlaw Hierarchy can expand appropriately? Everton can certainly expand **sustainably** – *on the south side of the A631* – with space for doctors surgery, dentist, PO and retail to add to the existing 2 x pubs, successful school, excellent transport links, 2 x cafes/Farm Shop, village hall, fantastic sporting facilities and offices. Indeed, Everton is the only Bassetlaw A631 settlement not to have been by-passed – because the business community at that time would not allow it.

Please note – 5.2.2 and 5.2.3 of the BELP look down the telescope the wrong way. No-one is suggesting a vast housing estate without services. We want to deliver services on an A-road frontage location. And for these new services to benefit existing residents.

**OBJECTION – ST2 does not deliver against 5.2.1 of the BELP/SO5 or the NPPF because the proposed housing allocations to current Rural Service Centres are too small. They are practically meaningless – you need housing allocations to deliver NEW services. ST2 is unjustified, inconsistent with National Policy and cannot claim to be delivering rural VITALITY at 5.2.1.**

Between Bawtry and Gainsborough, the A631 flows unhindered for 12 miles bar various speed limits and a single roundabout at Beckingham. It is suggested here that 1 x set of traffic lights (of the variety to assist the equine fraternity) at the point of the current pedestrian crossing in Everton, would not be of detriment to traffic flow along the 12-mile stretch. Rather, it would help the awkward A631 cross roads from Mattersey and the acute A631 turning into Chapel Lane.

**The current spatial strategy (ST1) is lop-sided/west focussed, ignores current Rural Service Centres, is not sustainable, is not justified, fails to comply with 5.1.1/SO5 and merits OBJECTION.**

## **3. Community Consultation and Neighbourhood Planning**

Previous consultation responses have not been collated by the Council. Our experience of Neighbourhood Planning (NP) was laid out in detail and it is disturbing to read that the LPA deems itself to possess a "strong tradition of Neighbourhood Planning" at 5.2.11 when less than 10% of NPs nationally were called for a public hearing – unlike in Everton.

5.1.60 states that development will be allowed within settlement boundaries yet the development boundary for Everton is entirely incorrect with FOUR planning approvals totalling over 3acres and stretching the settlement boundary in a westerly direction, ignored:

- a. Farm Shop and Café - IMPLEMENTED
- b. Farm Shed and Sui Generis diversification - IMPLEMENTED
- c. 20/00819/COND – IMPLEMENTED (nor shown in the housing trajectory)
- d. 21/00042/COND – IMPLEMENTED (nor shown in the housing trajectory)

This is despite responding to all statutory NP consultations and filing a formal complaint reference the above omissions. The omissions additionally mean that the character map for this part of Everton is incorrect in the made NP and we have had TWO refusals resulting from this misrepresentation of the village grain. We have just submitted to Appeal and incurred significant cost as a result.

5.2.9 states that rural growth will be delivered by Neighbourhood Plan allocations – yet I have already fed back that **Everton NP does not have any allocations**. The Examiner scrubbed those supported by the LPA because they did not meet the Basic Conditions and, [REDACTED] Minutes confirming this occurrence were submitted to the previous consultation), he required that a windfall policy be implemented instead.

ST2 Table at Pg 30 shows that of 34 “small” settlements allowed to grow to a 5% cap, only one will have the ability to build 2 houses per annum to 2038. Most, like Everton, won’t even get to build ONE/pa – yet 5.2.10 will require site promoters to negotiate with the community in order to get any more. This is not justified; it will not be effective and it is not consistent with National Policy – Objection.

Likewise, **5.2.12 will not work**. Our 2016 application provided a large cemetery extension that dwarfed the current provision, a cemetery car park, affordable housing contributions, open space contributions, education contributions and a new bus stop – all via a signed s106 – and the community still hated it because there were 14 houses that they couldn’t see. [REDACTED]

Ultimately, the Examiner to the Neighbourhood Plan pragmatically scrubbed the need for Community support ref: cemetery provision understanding that this key NP target would not be delivered otherwise.

I cannot find the 2022 Rural Implementation Guide or the 2022 Rural Settlement Study Update but they are likely to contribute to a decimation of rural vitality and sustainability and growth. This chapter very clearly demonstrates that the LPA expects villages to stagnate and I expect there to be a number of primary school closures in the rural district by 2038.

**OBJECTION – ST2 does not deliver against 5.2.1 of the BELP/SO5 or the NPPF because the proposed housing allocations to current Rural Service Centres are too small. They are practically meaningless – you need housing allocations to deliver NEW services. ST2 is unjustified, inconsistent with National Policy and cannot claim to be delivering rural VITALITY at 5.2.1.**

The council weights rural opinion exponentially higher than urban opinion in this and all preceding BELPs. Is this legal?

#### 4. Policy ST15

In view of section 3 above please add the Stonegate Farm site to the Housing Allocations table within Policy ST15 – please title as site H6. Site size is 4ha with capacity to deliver 65 units with the remainder of the site required for retail, leisure and employment land.

#### 5. Bassetlaw Landscape Assessment 2019 & 3rd Addendum added 6.1.22

This document concerns allocations around “higher tier” settlements, described as such in the draft settlement hierarchy POLICY ST1. Specifically, these evidence bases assesses sightlines and impact on settlement character by said allocations. The assessments are **not** compelling with many allocations in locations/gateways of high visibility. Nowhere in any of the evidence base documents have the Council provided a Zone of Theoretical Visibility (ZTV) for strategic urban extensions in “higher tier” settlements.

Please find our own ZTV attached (APPENDIX A), for a site in Everton. It shows that Everton can expand markedly without visual impact from the south, east, west or north – excepting that road frontage onto the A631 can always be enhanced where necessary. Strategic Objectives concerning character, are therefore satisfied by the ZTV.

Case Officers at the Council have repeatedly failed to accept photographic and written evidence demonstrating the secluded nature of said site, leading to incurred expense ref: Appendix A. Furthermore, the Council has repeatedly misinterpreted the Landscape Character Assessment for Bassetlaw which presupposes and *encourages* development adjacent to settlement boundaries in the rural area.

**Objection – The Character/Landscape bar for strategic urban extensions/allocations to top tier and Large Rural villages, is significantly lower than that for current Rural Service Centres. Applicants have already demonstrated the secluded nature of the Everton development site via exhaustive photographic evidence and topography detail – to no avail. It has now been necessary to pay for a ZTV and go to Appeal - when no other site in the BELP has needed to do so. Please see Appendix A which also shows 20/00819/COND.**

#### CONCLUSION

The BELP has gifted all surplus housing numbers to higher tier settlements following the collapse of the Garden Village proposal. This is despite said numbers having been taken from Rural Service Centres in the first place. The BELP is disproportionately focussed on Regeneration and SO4 thus subjecting the rural hinterland to undoubted stagnation. The vanishingly small amount of development proposed in the rural area is totally unacceptable and breaches both National Policy and the district’s own Strategic Objectives.

The constant references to “the community” and community-led planning in the rural context, is a cynical move that the Council is well aware will lead to ageing rural settlements and primary school closures. Policies ST1 and ST2 need to be rewritten in a non-cynical and balanced way – both numerically and in word.

Danielle Troop 21.6.22