



MAIN MATTER 2 EXAMINATION STATEMENT

DUNTHORNE & MORLEY

LOCAL PLAN VISION, ISSUES AND OBJECTIVES, SPATIAL STRATEGY, SETTLEMENT HIERARCHY AND THE DISTRIBUTION OF EMPLOYMENT AND HOUSING LAND



Main Matter 2 – Local Plan Vision, Issues and Objectives, Spatial Strategy, Settlement Hierarchy and the Distribution of Employment and Housing Land

Issue - Will the plan contribute to the achievement of sustainable development in the plan area (Policy S1)?

1) Are the plan's objectives appropriate and justified by the evidence and will they help deliver the vision and strategic priorities to 2033? Are the objectives soundly based and is it clear how the plan and its policies will deliver the objectives?

2) Is the plan period 2013-2033 justified?

3) Is Policy S1 consistent with the NPPF and will it be effective in delivering sustainable development and informing proposals for new development?

Introduction

1. Claremont Planning Consultancy Ltd previously provided responses to the Council's Publication Draft Local Plan on behalf of Dunthorne & Morley with regard to the requirement for the emerging strategy to boost housing requirements and recognise the need to ensure housing delivery within Mansfield. Key aspirations identified through the emerging plan with respect to addressing economic growth, meeting the needs of an ageing population whilst boosting the provision of the right type of homes are all reliant upon the provision of a necessary quantum of housing, whilst also ensuring that housing is actually delivered consistently across the plan period. Although the emerging vision attempts this through the allocation of strategic urban extensions as well as smaller housing sites, the resulting trajectory does not go far enough in boosting housing provision, with the timings of allocated site delivery considered to be overly constrained.
2. An example of this is the element of the SUE1 Pleasely Farm Strategic Allocation that is owned by Dunthorne & Morley, the land off Wharmby Avenue. Despite discussions taken place with the Local Planning Authority in respect of an imminent planning application and the submission of an EIA Screening Request in May 2019, the delivery of the site is delayed in the housing trajectory until 2028. This is despite the site having its own access and deliverable independently as an initial phase of the SUE allocation.
3. Similarly, the site at High Oakham Farm H11, also owned by Dunthorne & Morley has not been taken into account as a site that is likely to come forward early in the plan period due to its self-contained nature and ability to deliver an aspirational style of housing. This is particularly relevant given the opportunity it provides to provide a low-density scheme of executive homes, a type of housing that has been identified by the Council as in need and to be encouraged. What should be critically understood is the location at High Oakham is off an existing executive home development and is in a suitable area of the town where this type of housing can be successfully delivered. Dunthorne & Morley have delivered sites at Mansfield urban edge previously, such as the Paddock Close development that achieved outline consent before delivery by Bloor Homes within a 3-year timescale. Although the LPA's suggestion that earlier applications on allocation sites are welcomed, Claremont Planning maintain that a higher annual housing delivery level in the earlier years of the housing trajectory is preferable in terms of boosting provision and ensuring delivery. Furthermore, that the submission of expressions of interest from national housebuilders does not guarantee their continued interest to development or that the site will be delivered in accordance with the trajectory.



Policy S1

4. The inclusion of Policy S1 seeks to integrate the NPPF's presumption in favour of sustainable development into local planning policy. The aim of integrating the policy presumption in favour of suitable sustainable development as a critical component in the ethos of the Local Plan's strategy is welcomed and provides a basis for proposals to be approved without delay. The application of this policy in light of proposed allocations and published housing trajectory should however be taken into account. The submission of a planning application that allows the delivery of an allocated site ahead of its expected position in the housing trajectory must be considered to be sustainable development and determined without delay. The intended delays in delivery that have emerged through the housing trajectory somewhat conflicts with the principle of Policy S1, but it is understood that the Local Plan has taken on board central planning guidance and the NPPF when formulating their trajectory and reliable housing supply across the plan period.

Issue - Is the spatial strategy, settlement hierarchy and distribution of housing, employment and retail development appropriate and justified by a robust and credible evidence base (Policy S2)?

7) Is the spatial distribution of housing development in Policy S2 justified?

13) Overall will the spatial strategy set out in Policy S2 contribute to the plan's vision for the District and if so, how?

Policy S2

5. The Spatial Strategy intended up to 2033 is supported and although ideally a higher housing delivery level would be preferred, especially over the first 10 years, the strategy of distributing development is considered to be sound. Equally the time period of the Plan is considered to be justified by the available evidence base with respect to cross-boundary influences and providing for evidenced needs.
6. In terms of the location and selection of sites to accommodate the distribution of development within Mansfield District, it is understood that a key document informing this approach is the Mansfield HELAA 2018 which tested sites against the NPPG's test of suitability, availability and achievability when measured against the specific, site contexts as well as of the wider District. Dunthorne & Morley are not minded to question the findings of the HELAA given that it is compliant with the NPPG's guidelines in how the LPA is to approach site identification [Paragraph 017 Reference ID 3-017-20140306]. As such, the identification of the sites which have been incorporated into the emerging spatial strategy has followed the findings of the HELAA, as well incorporated other evidence base data which has resulted in the implementation of the spatial strategy into the emerging local planning policy. Furthermore, it is advanced that the 2018 Mansfield HELAA, which assessed the wider strategic allocation, SUE1, as site reference 52, separately to that under the control of Dunthorne & Morley at Wharmby Avenue, site referenced 170. It should be duly noted that the wider allocation area, HELAA reference 52, was only regarded as Available, with the site established as "Potentially Suitable and Potentially Achievable." Suitability was questioned due to the perceived impact on the loss of higher grade agricultural land and effects on various other considerations. However, the site to the north of Wharmby Avenue, HELAA reference 170 was deemed as Available and Suitable and only "Potentially Achievable," with these achievability considerations the same reasons as HELAA 52. As such, the HELAA assessment demonstrates that the site under the



control of Dunthorne & Morley, site 52, whilst forming part of the wider strategic allocation, represents a deliverable component of it.

7. Furthermore, given the makeup of the District, which is dominated by the Mansfield Urban area, it is an appropriate and logical approach to direct development towards Mansfield itself, given that it represents the most sustainable location within the District, in terms of the access to amenities and facilities, as well the capacity of local infrastructures. If additional levels of growth beyond the Mansfield Urban area was promoted by the Local Plan, this would not demonstrate compliance with national planning policy, as it would not demonstrate an approach that achieves sustainable development, given that the poorer connections that the rural areas of the District demonstrate. As such, Claremont Planning on behalf of Dunthorne & Morley support the approach the emerging Plan has made in directing the majority of growth towards Mansfield Urban area, which clearly establishes a sound approach that is in compliance with the National Planning Policy Framework [Part 2, Paragraph 7]. Furthermore, the intentions of Policy S2 must be engaged holistically, with the word “most” tying with the split of the distribution of development in the District, with 90% of development intended to Mansfield urban area relating to the reference of “most.”
8. The apportionment of growth to Mansfield is justified, given that Mansfield and its urban area occupy the top of the emerging Settlement Hierarchy and therefore has been recognised as the most sustainable location to accommodate significant levels of growth and development. As previously stated, given that the District covers a spatially limited area, it is logical and justified for the LPA to direct the majority of growth towards the District’s primary urban area.
9. The Plan, in allocating 90% of all of the District’s growth towards Mansfield, it is appropriately fulfilling the aspirations of both the Plan, but also acting on the emerging Settlement Hierarchy which establishes how the spatial strategy for the District will be practically implemented. In doing so, the emerging Local Plan demonstrates a sound approach in achieving its strategic objectives in meeting the needs of the Council area as recognised within the Plan.
10. The emerging spatial strategy of the draft Local Plan establishes a sound approach in securing development within the District that can meet the identified need within the emerging Plan. Identification of strategic sites such as at Pleasley Hill Farm SUE1 demonstrates a robust strategy that is both aspirational, but also deliverable given that the strategy also identifies a wide range and number of differing sized sites to ensure that a rigorously deliverable spatial strategy can be maintained through the Local Plan. Furthermore, it is advanced that the sites under control by Dunthorne & Morley both demonstrate independent delivery and market suitability due to their scale and access arrangements. Although the land off Wharmby Avenue constitutes part of the wider SUE1 allocation, it remains independently deliverable. This is important to note, given the issues of delay that surround the delivery of strategic sites and have been examined at a national level as to their suitability in addressing housing requirements over a whole plan period.
11. It is maintained by Claremont Planning, on behalf of Dunthorne & Morley, that the approach indicated by the submitted Local Plan is appropriate, indeed the Settlement Hierarchy which identifies that the Mansfield Urban area as the primary settlement of the District is justified and appropriate in the context of the District, with Mansfield hosting the widest range of facilities and services. Subsequently, Mansfield and its urban area represents the most sustainable location within the District to achieve the requisite growth to meet the needs of the new Local Plan. Therefore, the identification of the site at Pleasley Hill Farm to accommodate strategic



levels of growth is appropriate given that it can best exploit the sustainable location that an edge of settlement position demonstrates.

12. With the Mansfield Urban area occupying the top category in the emerging settlement hierarchy, it is appropriate for the emerging Local Plan to allocate the majority of growth at Mansfield, the majority representing 90% of the gross amount of growth to be delivered within the District over the new Plan period to 2033. Whilst this would in the first instance appear inappropriate in terms of weighting this distribution, given the limited spatial area which the District covers, it is a justified approach by the Local Plan in directing this level of growth towards Mansfield. It will both take advantage of the existing service base, but also support the economic development aspirations of the District Council.
13. In terms of the location and selection of sites to accommodate the distribution of development within Mansfield District, it is understood that a key document informing this approach is the Mansfield HELAA 2018 which tested sites against the NPPG's test of suitability, availability and achievability when measured against the specific, site contexts as well as of the wider District. Dunthorne & Morley are not minded to question the findings of the HELAA given that it is compliant with the NPPG's guidelines in how the LPA is to approach site identification [ID 3-017-20140306]. As such, it is considered to be a reliable form of evidence gathering to inform the emerging strategy, with the identification of the sites following the findings of the HELAA.

Strategic Policy Approach

14. The supporting text to Policy S2 provides adequate description and guidance on the application of the policy, moreover that it does not intend to overly constrain development but direct delivery to the most suitable locations. It is considered that the identification of Mansfield Urban Area, Market Worsop and Worsop Parish Areas as those locations best served by sustainable modes of transport including public transport. Locations beyond these identified settlements must demonstrate their sustainability and access to public transport services.
15. With respect to the proposed site allocations and expanded settlement boundaries, the proposed allocations have been based upon permanent landscape features such as highways, field boundaries and wood land edges that will be used as revised settlement boundary extents. The allocations will crucially provide open space, highway access and drainage provisions within their extents so that the extension of settlement boundaries are appropriate. Future identification of settlement boundaries may choose to limit the extent of boundaries to exclude peripheral open space or landscaping areas, but as such areas would have policy protection and be prohibited from development, their incorporation into a settlement extent is not harmful. Instead the planning of site allocations should positively address the need to define a defensible settlement boundary as a characteristic of any emerging proposals.
16. It is maintained that the soundness of development distribution across the Plan area, as well as the approach towards the expansion of Mansfield to accommodate the majority of new homes, will deliver sustainable development in accordance with the NPPF. Further flexibility in the approach of applying the housing trajectory is however recommended to improve housing delivery assurance and ensure the required quantum of housing addresses OAN requirements over the whole plan period.