

Mansfield District Local Plan
Hearing Position Statement

On behalf of Welbeck Estates Company Ltd

30th April 2019

Quality Control

Project No.	14.033			
Client	The Welbeck Estates Company Ltd			
Title	Hearing Statements: Mansfield Local Plan Examination in Public (EiP) 2019			
File reference	P&DG/14.033 HS			
Issue	Date	Prepared By	Reviewed By	Authorised By
1.	30 th April 2019	CJ	RH	RH

1.0 Introduction

1.1 This Hearing Position Statement sets out P&DG's representations to the Mansfield Local Plan Examination in Public (EiP), submitted on behalf of the Welbeck Estates Company Ltd.

1.2 Representations are provided in response to the following Matters and Questions:

- *Hearing Statement 1 – Main Matter 1 - Duty to Cooperate and other Legal Requirements*
- *Hearing Statement 2 – Main Matter 2 – Local Plan Vision, Issues and Objectives, Spatial Strategy, Settlement Hierarchy, and the distribution of employment and housing*
- *Hearing Statement 3 – Main Matter 3 – Whether or not the plan will secure high quality sustainable design and safeguard and enhance the District's landscape character, natural and historic environment*
- *Hearing Statement 4 – Main Matter 4 - Whether or not the approach to assessing housing and employment needs and the housing and employment land requirements are robustly based and consistent with national policy.*
- *Hearing Statement 5 – Main Matter 5 - Whether or not the proposed strategic urban extensions and employment allocations are soundly based and deliverable in the plan period and whether other policies for employment and the economy are soundly based.*
- *Hearing Statement 6 – Main Matter 8 - Whether or not the plan makes appropriate provision for new infrastructure to support the level of new development proposed.*

1.3 This Statement should be read in conjunction with P&DG's previous representations made to the Mansfield District Local Plan at Publication Draft (Regulation 19).

3.0 Hearing Statement 2

Main Matter 2 – Local Plan Vision, Issues and Objectives, Spatial Strategy, Settlement Hierarchy, and the distribution of employment and housing

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

Question 1: Are the plan's objectives appropriate and justified by the evidence and will they help to 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?

- 3.1 Yes, we believe that the plan will contribute to the achievement of sustainable development and a larger part of this is by bringing forward strategic site commitments that offer a host of opportunities that deliver on all three strands of sustainable development. The plan's objectives are appropriate and have been justified by the substantial evidence presented to this Examination.

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

- 3.2 Policy S1, in our view, has been prepared positively and is consistent with the NPPF when concerning the presumption in favour of sustainable development.

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)?

- 3.3 The spatial strategy directs the provision and distribution of housing development in accordance with the settlement hierarchy; directing development principally to urban concentration of Mansfield as the most sustainable settlement, as well as looking to the remaining settlements, which are capable of accommodating and delivering proportionate residential development in order to meet additional housing growth requirements. This sequential approach takes support from the National Planning Policy Framework. The settlement hierarchy supports the principle of sustainable development and is grouped appropriately.

Question 8: Is the 'ceiling' on the level of retail and leisure development within Policy S2 Part 2c justified and is the policy positively prepared?

- 3.4 We believe that the policy is not positively prepared if it adopts the position of a ceiling and it would be best modified to refer to a minimum level of retail and leisure

development in Policy S2 Part 2c to support full flexibility and changes of circumstances during the plan period.

Question 10: What approach has been taken to identifying the settlement boundaries and are they appropriately identified on the Policies Maps?

- 3.5 We had previously raised concerns with the application of the proposed settlement boundaries in light of the allocation area of Policy SUE2 Jubilee Way being incorrect. Since this point we are hopeful to have come to a position of common ground with Mansfield District Council both on the masterplan accompanying Policy SUE2 and the associated boundary.

Question 11: Does the spatial strategy in Policy S2 make clear the approach that will apply to development in the countryside?

- 3.6 The approach that will apply to development in the countryside is applied in Policy S5.

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

- 3.7 We agree that the Spatial Strategy sets out the key parameters of how the plan's overall vision and objectives will be met for the District. The spatial strategy is positively prepared, clear and prescriptive of the direction of growth throughout the plan period to 2033. The role of both underutilised and sustainable greenfield sites is necessary to help deliver this aim, while we support the policy's proactive approach to housing and employment growth as a minimum figure to provide choice to adapt to varying market signals and opportunities during the plan period so that the plan remains sufficiently flexible. We would encourage the retail and leisure provision in the policy to be a minimum figure consistent with that applied for the housing and employment provision documented in the plan, and for the distribution of this figure split between Mansfield Town Centre, Mansfield Woodhouse, Market Warsop and housing growth areas. With regards to the latter, the absence of a minimum figure could prejudice some operators from being able to secure a suitable property in areas where there may be an identified demand without harm to other sites, or may prejudice the successful growth of neighbourhood parades as sought by the plan.

Issue – Are the plan's policies for urban regeneration and key regeneration sites soundly based (Policies S3 and S4)?

Question 14: Should Policy S3 include reference to a wider range of surplus and/or derelict land which does not fall within the definition of previously developed land?

3.8 Yes. We would support greater flexibility within Policy S3 to include land which very clearly represents surplus, vacant or derelict land on the ground, but would not strictly fall within the definition of previously developed land. In the case of the strategic site at Jubilee Way, a large part of the site is considered to be greenfield in planning terms as the former colliery site has been restored into a golf course. There however exists a significant amount of surplus and vacant land that is currently underutilised and this has been increased with the current viability of the Family Golf Centre site which has now closed. The allocation of the site at Jubilee Way in Policy SUE2 would catalyse all of the regenerative expectations of Policy S3, namely:

1. It would bring forward high quality housing and mixed use development;
2. It would assist with the wider regeneration of the Oak Tree neighbourhood through the provision of modern, better quality housing and substantially increased public realm, neighbourhood areas and public open space;
3. It would provide economic development that diversifies the local economic offer;
4. It would enhance townscape and civic spaces throughout the proposed scheme;
5. It would improve the appearance of key gateways and other prominent sites by providing a sense of identity with the development expected to harness local distinctiveness and its own identity, natural surveillance and possible crime and disorder reductions;
6. To meet the capacities of development, and to account for the future impacts of climate change, it would improve resilience to flooding and provide substantial wetland areas that provide both amenity and biodiversity improvements.
7. It would improve traffic arrangements including the provision of enhancements to traffic infrastructure and footway/cycleway links between where existing and future occupants live and the prospective green infrastructure that is to be enjoyed;
8. It will create a substantial increase in the amount of publicly accessible green infrastructure, including open spaces and wildlife corridors that safeguard protected species in ways that are not now and rely upon development proposals to be delivered.