

FOREST TOWN COMMUNITY COUNCIL (FTCC)

April 2019 Hearing Statement for the Mansfield Local Plan
to supplement FTCC's original representations

MAIN MATTER 2

Local Plan Vision, Issues and Objectives, spatial strategy, settlement hierarchy and the distribution of employment and housing land

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)?

Question 5 – Were alternative options for the level and distribution of development considered during the plan’s preparation and is it clear why alternatives were discounted?

1. For the reasons set out in the Forest Town Community Council's (FTCC's) Hearing Statement for Main Matter 1 Questions 7 and 8, the FTCC does not believe that alternative options for the level and distribution of development were adequately considered during the proposed Plan’s preparation.
2. Similarly, for the reasons set out in the FTCC's Hearing Statement for Main Matter 1 Questions 7 and 8, the FTCC does not believe that Mansfield District Council (MDC) has made clear why alternatives options were discounted.

Question 7 – Is the spatial distribution of housing development in Policy S2 justified? What evidence justifies the ‘split’ in the distribution of housing between the Mansfield Urban Area (90%) and Warsop parish (including the villages)

3. For the reasons set out in the FTCC's Hearing Statement for Main Matter 1 Questions 7 and 8, the FTCC does not believe that the spatial distribution of housing development in Policy S2 justified, bearing in mind that in this context the term 'justified' is used to mean that Policy S2 should be the most appropriate policy when considered against the reasonable alternatives, based on proportionate evidence.
4. The Community Council maintains that MDC has yet to produce a robust and credible evidence base with respect to reasonable alternatives, not least because MDC has yet to commission or undertake adequate research / objective assessment / fact finding with respect to Forest Town's needs, etc. meaning that the choices MDC has made in their proposed Plan are not backed up by facts.

5. The FTCC is also aware that a dimension of the proper test as to whether or not Policy S2 is justified relates to the participation of the local community and others with a stake in the area.
6. For a variety of reasons set out in this and in previous FTCC submissions, including with respect to MDC's failure to take on board comments made verbally (and in some instances also in writing), the Community Council does not feel that MDC has achieved an adequate level of participation by the local community and other stakeholders to constitute 'justification' of Policy S2.
7. Additionally, the FTCC is aware that a further dimension for consideration with respect to the Test of Soundness associated with the question of whether or not Policy S2 is justified pertains to the question of whether or not the Policy provides the Plan with the most appropriate policy when considered against reasonable alternatives.
8. As should now be clear, FTCC maintains that there remains realistic alternatives that have yet to be properly subjected to sustainability appraisal. FTCC is not convinced that MDC has demonstrated how their policies and proposals will help ensure that the social, environmental, economic and resource use objectives of sustainability will be achieved.

Question 9 – What evidence has informed the different settlement categories in the settlement hierarchy in Policy S2 and is the approach justified? In addition: Should the Mansfield Urban area include reference to Forest Town?

9. The Community Council awaits MDC's latest response to this vital question. Needless to say, the FTCC remains unclear about what evidence has informed MDC's steadfastly-held decisions about different settlement categories in the settlement hierarchy in Policy S2.
10. The Community Council remains unconvinced that the approach adopted by MDC is justified.
11. The Forest Town Community Council continues to be of the view that the Mansfield Urban Area should exclude reference to Forest Town, and that Forest Town would be better classed as part of the 'urban/rural fringe'.
12. Various parts of the Publication Draft Local Plan refer to 'Forest Town' as if it falls wholly within what MDC proposes to constitute as the 'Mansfield Urban Area'.
13. For example, the definition of the Mansfield Urban Area on page 220 of the Publication Draft Local Plan states that: "*Mansfield Urban Area is the main built up settlement within the district comprising, Mansfield, Mansfield Woodhouse, Forest Town and parts of Rainworth and Clipstone that fall within Mansfield District*".

14. Similarly, Objective 1 on page 17 of the Publication Draft Local Plan talks about an intention to: *"...direct most development to the Mansfield urban area, including Mansfield Woodhouse, Forest Town and Rainworth, followed by Market Warsop, whilst seeking to mitigate against any significant adverse social, environmental and infrastructure impacts of development. "*
15. If Forest Town is to be referred to within the context of being part of a Mansfield Urban/Settlement Area, it should be made explicit that only *"parts of Forest Town"* fall within this area.
16. As set out in the Forest Town Community Council's Hearing Statement on Main Matter 1 (Question 8), the boundary of Forest Town includes both part of what MDC is proposing to include as part of the 'Mansfield Urban Area' and also part of what MDC is proposing to describe as being in the countryside.
17. As such, in addition to the issues of whether or not portions of Forest Town should be included in the Mansfield Urban Area and whether or not that area should be referred to using other language such as the 'Mansfield Settlement Area' (PD/50), it is not appropriate for the Plan to imply that the portion of Forest Town which is in the area is the entirety of Forest Town.