



MAIN MATTER 5 EXAMINATION STATEMENT

DUNTHORNE & MORLEY

**WHETHER OR NOT THE PROPOSED STRATEGIC
URBAN EXTENSIONS AND EMPLOMENT
ALLOCATIONS ARE SOUNDLY BASED AND
DELIVERABLE IN THE PLAN PERIOD**



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?

Are the strategic site and employment allocations soundly based?

What approach has been taken where specific site constraints or developer intentions are known?

1. Claremont Planning Consultancy Ltd, act on behalf of Dunthorne & Morley who own land off Wharmby Avenue, which is included within the Pleasley Hill Farm SUE1 allocation as well as housing allocation site H1L at Wharmby Avenue in the emerging Local Plan. It should be noted that the land under the control of Dunthorne & Morley at SUE1, does not represent the strategic allocation in its entirety, rather it covers an area of 3.56ha to the north of Wharmby Avenue. The Council's approach to allocation delivery has not wholeheartedly taken into account the intentions of land owners to submit planning applications early in the plan process, such as alongside the examination of the plan.
2. This is illustrated by Dunthorne & Morley's intentions to submit an application on their land at Wharmby Avenue, within the SUE1 allocation, alongside the examination of the plan. Despite having discussions with the Council Officer with regard to Masterplanning, linkages and development components and the submission of an EIA Screening request, the delivery timing of the site has been substantially delayed in the housing trajectory. The reliance upon option agreements with housebuilders or developer expressions of interest is not considered to be pertinent to this site and the overall deliverability of it for housing, given its draft allocation, available highway access and relationship to the SUE1 extent.
3. Despite the disappointing positioning of the site in the housing trajectory, Dunthorne & Morley will be proceeding with their proposals for the site and conducting studies in respect of the site's ecology, landscape position, transport assessments to demonstrate access, utilities investigations, topographical survey and a Flood Risk Assessment to provide sustainable drainage across the site. These studies will inform an outline Masterplan that will correspond with the wider SUE1 proposals and demonstrate delivery of the allocation. This intention of the landowner should demonstrate the delivery of the site and the realistic potential for the site to be delivered ahead of the proposed trajectory. At the time of the submission of Hearing Statements the drafted SOCG for the SUE1 parties did not propose a satisfactory housing trajectory for the Wharmby Avenue site and therefore the SOCG was not agreed. It is hoped that the ongoing work and submission of EIA screening will provide the LPA with confidence of the site's delivery earlier than currently proposed by the trajectory.

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4. The Wharmby Avenue site, which forms part of SUE1 is a residential component of the wider strategic development and is deliverable as a freestanding phase due to its existing access arrangements as well as being surrounded on three sides by the existing urban area. The Wharmby Avenue site has no issues of delivery with respect to viability and it is advanced that its provision separately from the main SUE area will be attractive as an initial phase of the allocation. The Wharmby Avenue site can be delivered as part of the SUE, or entirely separately as an independent element to the emerging allocation.



5. Claremont Planning Consultancy Ltd wish to emphasise their support for the provision of a strategic allocation at Pleasley Hill Farm SUE1 and that it represents an appropriate, deliverable location to achieve strategically significant levels of growth at Mansfield. The land interests of Dunthorne & Morley form a component of the wider site and could be delivered independently as well as alongside the wider allocation. Whilst it is acknowledged that strategic allocations and their delivery can give rise to material impacts to their immediate locality, such as changes to local landscape or impacts on local infrastructure, this should be carefully balanced with the positive aspects of their provision through the delivery of significant numbers of homes to meet local need.
6. Whilst the identification of sites that are of a strategic scale has taken into account a number of considerations and factors, the methodology that underpins the emerging Local Plan's identification of sites to meet the housing need is in line with national requirements and guidance. For example, the HELAA, which is a comprehensive site assessment document, applies the PPG methodology in terms of site selection and assessment, which includes multiple "sieves," and stages to remove the less preferable sites that are identified. Given that the component land areas with SUE1 have been demonstrated to be suitable and deliverable through the submitted HELAA, there is no apparent or material reason to find the strategic allocation unsound.
7. 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. In addition, Dunthorne & Morley own the site and have un-ransomed access from the adopted highway.
8. The Site Selection Technical Paper incorporates a more holistic approach, taking into account the findings of the HELAA, the Sustainability Appraisal as well as policy requirements of the emerging Local Plan. Given that this document incorporates and engages with the assessments from multiple sources, it provides far more wide-ranging analysis of those sites which have been selected as preferable locations to secure new development. As this paper assesses both strategic and non-strategic sites, the assessment is appropriate in its determination of levels of growth across a range of sites within Mansfield.
9. In terms of the SUE site at Pleasley Hill, the assessment of the site within the technical paper has split the component land parcels and assessed them individually. This analysis has demonstrated the component parcels of the SUE are deliverable and available, informing the strategic planning of growth at Mansfield and the resulting SUE1 being of a scale that is able to address infrastructure requirements.
10. The Wharmby Avenue site under the control of Dunthorne & Morley has been assessed separately to the primary area of land that forms the strategic allocation. Whilst this indicates



that the site has been promoted separately to the wider area, this does not preclude the delivery of the site as part of the broad location of growth which has been identified. Furthermore, this underlines the deliverability of the site as an independent component of the strategic allocation, but its delivery as a supporting element of the wider site, with access directly from Wharmby Avenue, rather than through the wider area of the site. However, it is Dunthorne & Morley's objective to ensure that the site remains potentially capable of being embedded within the strategic area and as such linkages, such as by pedestrian and cycle, are provided to ensure permeability with the wider strategic allocation that will address infrastructure and service requirements as a whole, including a comprehensive drainage system

Is the site allocation soundly based having regard to paragraph 8.4 of the plan and the viability study which indicate that the site is not viable? What interventions would be necessary to ensure that the site is deliverable?

11. It is acknowledged that the proposed SUE1 allocation site was identified as having issues pertaining to viability in the earlier stages of plan preparation due to the infrastructure requirements in the site's delivery. However, the requirements of the policy in terms of land uses within the allocation establish the viabilities of the site and its overall ability for delivery. If a greater degree of flexibility were to be incorporated into the allocation policy requirements, to include amendments to the employment land mix and housing numbers, this could positively contribute towards ensuring the viability of the site. Furthermore, Claremont Planning Consultancy are of the view that the current housing numbers identified for the wider strategic allocation should be considered as an absolute minimum, with greater scope to increase this number if there is sufficient justification, such as ensuring high quality design through higher densities, alongside ensuring that the site remains viable and practically deliverable.

Is the requirement for a masterplan reasonable and would it provide an appropriate framework for the development of site proposals and sufficient flexibility to respond to changing circumstances?

12. The indicative masterplan provided at Appendix 8 Figure A8.1 is intended to demonstrate how the SUE allocation would utilise the space up to the A607 and Water Lane, taking advantage of established landscape features that already contain the urban landscape of Mansfield.
13. Dunthorne & Morley support the provision of strategic development SUE1 at Pleasley Hill Farm. Whilst it is acknowledged that the delivery of the site could result in some impacts on the relatively sensitive local landscape, it is advanced that through the inclusion of policy requirements that include appropriate landscape mitigation measures, these concerns should be suitably overcome. Furthermore, it should be duly recognised that the Wharmby Avenue area of SUE1 is not as constrained by such considerations in comparison to the wider SUE site and therefore should be recognised as a highly deliverable element of the strategic allocation. Given that the site is less influenced by landscape factors, the delivery of the site should inform the phasing of the SUE as well as the delivery of the wider spatial strategy.
14. It is advanced that the site to the north of Wharmby Avenue, under the control of Dunthorne & Morley (identified as site ref 170 in the Site Selection Technical Paper), can be delivered separately as an independent phase of the strategic allocation. The delivery of this area helps to demonstrate that the component parts of the SUE are deliverable, establishing how the site can be delivered in phases. As such, it is important for the Local Plan to recognise this and for



the Masterplan at figure A8.1 to respond accordingly as being 'illustrative' and subject to variation as the scheme progresses.

15. Claremont Planning are of the view that a minor modification to provide more flexibility in the allocation is advisable, particularly in respect of referencing the quantum of development as a minimum. This flexibility would allow for varied densities to be delivered to respond to housing market changes, as well as realignment of employment provisions to address changing needs. This minor amendment, as well as changes to the indicative masterplan A8.1, will demonstrate a sound allocation that overcome the issues of viability as duly considered in the Plan, and will provide an allocation that can respond to changing dynamics of the local housing and employment markets.

Have cross boundary impacts been identified and appropriately addressed?

16. The location of SUE1 adjacent to Bolsover District to the north has crucially taken into account infrastructure implications, whilst also addressing strategic priorities as required by paragraph 20 of the NPPF, as well as fulfilling the requirements of the Duty to Co-operate. As set out in the SOCG with Bolsover District, the SUE1 allocation is agreed in principle to deliver a mix of uses and address transport impacts arising on the A619. The preparation of an EIA application for the wider SUE site is demonstration of its delivery and the inclusion of cross-boundary factors into the scope of any ES has been established. Through the forthcoming application and SOCG with Bolsover District it is apparent the SUE1 allocation will suitably address cross-boundary impacts.
17. The identification of Pleasley Hill Farm as a location for a strategic allocation is appropriate given its relationship to Mansfield's urban edge and the high level of sustainability that can be gained from the existing links to the urban area through the A617 and A6191. The extent of the allocation will correspond with the existing built form up to Water Lane, responding to an identified landscape feature. It is acknowledged that the scale of the allocation will result in impacts on the local landscape, infrastructure and character, however, this must be balanced with the delivery of positive considerations such as the investment in the local economy, the generation of jobs and the delivery of homes. The strategic scale of the allocation will allow for the provision of landscape mitigation to offset the impacts of built form at this location whilst establishing Water Lane as the limit to development extent, with mitigation measures to overcome these perceived impacts.

Conclusion

18. The Wharmby Avenue site under control of Dunthorne & Morley represents a deliverable element of the wider strategic allocation identified at Pleasley Hill Farm. Its inclusion as part of this location, as well as the allocation itself, represents a justified and sound approach in ensuring that the requirements of the new Local Plan can be met within the Plan period. Whilst it is acknowledged there are issues of viability and deliverability of the wider SUE site, it is advanced that these can be overcome through modifications and amendments to the allocation to ensure that greater flexibility can be provided for over the lifetime of the allocation. This will contribute towards overcoming the issue of viability and will provide a more deliverable scheme.