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Our Ref: 11318/CT

15 December 2010

Planning Policy Team,
Bassetlaw District Council,
Queen's Buildings,
Potter Street,
Worksop,
Nottinghamshire.
S81 0NL



Dear Sir / Madam

**BASSETLAW DISTRICT LOCAL DEVELOPMENT FRAMEWORK
PUBLICATION DRAFT CORE STRATEGY**

**REPRESENTATION ON BEHALF OF MESSRS. D. & M. BARKER
FAIRYGROVE NURSERIES, LONDON ROAD, RETFORD**

Points of support

We are writing to give broad support the Publication Draft Core Strategy as it applies to the town of Retford, and to draw your attention to the continued availability and development potential of the above site which measures approximately 3.69ha (gross developable area) and offers a highly sustainable opportunity to help meet the required quantum of housing growth. For ease of reference we have attached a plan of the site to this representation. As the planning authority is aware, the site is now disused and contains a range of structures associated with its former use, which are likely to become a source of environmental blight as they fall into dilapidation. The site is currently a wasted resource, and we consider it has particular potential for a highly sustainable housing development.

With regard to the Publication Draft Core Strategy, we have particular support for Policy CS1 which defines Retford as a Core Service Centre. We agree that in accordance with sustainable development principles, as the District's second largest settlement, with a diverse range of services and facilities, sustainable public transport connections, and a population of 22,000, Retford should be the focus for "levels of housing, employment

and town centre development to maintain and enhance its wide service role and market town character".

We also support Policy CS3 which states that at least 26% of the District's housing requirement will be delivered at Retford through existing permissions and allocations in the Site Allocations DPD, and through sustainable urban extensions as necessary. In this respect we would like to point out that while the majority of the subject site is technically an urban extension as it lies outside the current settlement boundary as defined by the Proposals Map, it is nonetheless contained by existing built development to the north, south, and west and by the London-Edinburgh railway line to the east. It therefore provides a well-contained opportunity to provide housing in a highly sustainable location while physically integrating those existing adjacent areas of development, without having any significant impact on the wider landscape and surrounding countryside.

With regard to the Development Management policies, we support the Major Development Principles as set out within Policy DM4 - Design and Character. We agree that all major development proposals, notably for sites allocated through the Site Allocations DPD, should demonstrate that they make clear functional and physical links with the existing settlement and surrounding area and have not been designed as 'standalone' additions. At the Preferred Options stage of consultation on the Core Strategy, our representation was accompanied by a Development Concept for the subject site. This was based on a detailed analysis of heritage constraints which was discussed and agreed with the Conservation Officer - Oliver Scott. The resulting concept embodies a number of character areas designed to reflect the varied form of existing development adjacent to the site. It also includes vehicular and pedestrian linkages from both Grove Road and London Road which are designed to facilitate appropriate connectivity with those areas. The concept also includes areas of landscaped public open space, and involves the reuse of the former Fairygrove Nurseries shop - now recognised as a non-designated heritage asset - as a small convenience store which would serve the development. Such considerations together ensure that the development envisaged would meet related criteria in Policy DM4: complementing and enhancing the character of the built, historic and natural environment; and providing a qualitative improvement to the existing range of houses, services, facilities, open space and economic development opportunities in the area.

We support the general principles behind Policy DM5: Housing Mix and Density, specifically the objective that development proposals will be expected to deliver housing at densities that reflect the specific characteristics of the site and its surrounding area (in terms of both built form and landscape). We would emphasise that the previously submitted Development Concept was not driven by a preconceived density, but rather by the need to achieve a highly sensitive and coherent mix of building forms and plot layouts. The average net density of that concept (at around 25 dwellings per hectare) is therefore the outcome of the approach applied, rather than the driving force.

It is considered, that while the site's location in a Conservation Area and on the rural fringe means a sensitive approach to layout and design should be taken, due regard should also be had for its highly sustainable location and market potential. The site is highly accessible by public transport, lying on a regular bus route only 1.6km south of Retford town centre which provides a diverse range of essential daily and higher-order services, and a breadth of employment opportunities. It is also located within what is regarded as one of the more desirable parts of Retford where properties benefit from strong market demand.

We support the general principles of Policy DM8: The Historic Environment. Development Proposals should indeed be designed to protect and enhance the historic environment and secure its long-term future. Our Development Concept, submitted at the Preferred Options stage was based on a careful analysis of designated and non-designated heritage assets on and in the setting of the site. The proposed concept seeks to avoid adverse impacts on significant heritage assets, and to ensure that the layout and design of the site responds positively to the character and appearance of the historic built environment adjacent to the site which includes for example the Grade II Listed C18th Whitehouses Inn, and the later C19th / early C20th villas adjacent to London Road.

While the majority of the site does not in itself contain any assets of heritage significance, it is recognised that the former nurseries shop and the adjacent gate pier at the site's London Road frontage are of local interest. The Development Concept, which has received the broad support of one possible developer, therefore proposes to reuse the shop as described above, and to make minimal alteration to the gate pier. The Development Concept as a whole has given careful consideration to factors of scale, design, materials and siting, as well as key views, and demonstrates that with a sensitive approach the site can be developed in a way which fully respects local heritage sensitivities but also results in a distinctive, attractive, and highly functional residential environment. In accordance with the advice of PPS3: Housing, that environment would provide a mix of quality housing opportunities to cater for a variety of needs.

It is understood that in relation to our earlier submissions, including the Development Concept and representations to the LDF and SHLAA process, Richard Schofield (Policy Manager), Joelle Davies (Policy officer managing the SHLAA process), Lionel Deakin (Principal Development Control officer) and Oliver Scott (Conservation Officer) met to discuss the site. We are encouraged by the response received which would suggest a consensus that based upon the developmental work undertaken to date, in principle it is possible for Conservation constraints to be overcome through a sensitive heritage-led approach and the site should continue to be brought forward through the SHLAA. We understand that no further detailed developmental work is required at this stage.

We recognise however, that there may be more than one acceptable way of developing the site, and that any broad Development Concept will need refinement to ensure that appropriate highways standards and other

specific requirements are met. It the interests of the effective continued promotion of the site through the SHLAA and the emerging Local Development Framework, we would therefore be very happy to meet as deemed appropriate to agree upon any further essential work.

Points of objection

Government guidance emphasises the importance of accessibility to public transport. Most settlements cannot be entirely self-sustaining, as most residents will need to travel to higher order centres to access certain essential services and for employment. Following on logically from this, the justification of the towns and higher-order villages as development centres, is in part dependent on there being a high degree of public-transport connectivity, and potential for interchange between different modes of public transport.

Accessibility to public transport should therefore be a key factor in determining the growth potential of individual settlements. We have previously recommended that the consideration of accessibility to public transport networks should be made explicit in the phrasing of core strategy policies and supporting text relating to the overall settlement hierarchy and proposals for individual settlements. It appears that for the most part, appropriate and consistent reference to current public transport infrastructure (including access to major bus and rail networks as relevant) remains lacking in the Core Strategy's identification of key settlements within the hierarchy.

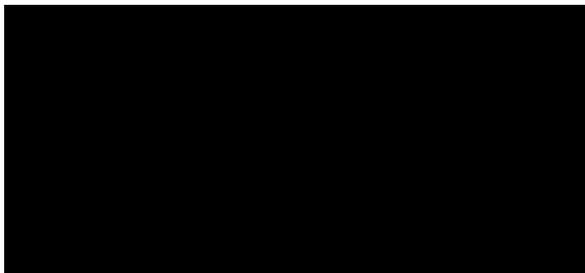
Planning Policy Statement 1 "Delivering Sustainable Development" was published in 2005. This notes in paragraph 27 that in preparing Development Plans, planning authorities should take into account issues such as accessibility and sustainable transport needs when bringing forward land for development and should provide improved access for all to jobs, health, education, shops, leisure and community facilities, open space, sport and recreation, by ensuring that new development is located where everyone can access services or facilities on foot, bicycle or public transport rather than having to rely on access by car. Planning should actively manage patterns of urban growth to make the fullest use of public transport.

Planning Policy Guidance Note 13 "Transport" was published in 2001 and represents current government policy on the relationship between development and transport. Paragraph 3 notes that by shaping the pattern of development and influencing the location, scale, density, design and mix of land uses, planning can help to reduce the need to travel, reduce the length of journeys and make it safer and easier for people to access jobs, shopping, leisure facilities and services by public transport, walking, and cycling. It therefore states, in paragraph 19 that, in preparing their development plans, local authorities "should give particular emphasis to accessibility in identifying the preferred areas and sites where such land uses should be located".

National planning policies are therefore calling upon local planning authorities to ensure that new development is accessible by public transport. This approach must therefore be carried forward into the Local Development Framework, and made explicit in related spatial policies (certainly CS1-CS8) and explanatory text. If it is not, then the justification for related policy choices is unclear and the plan is unsound.

With reference to the above points, it is also considered that an excessive quantum of housing development is proposed for Harworth/Bircotes. At c. 8,000 population, this settlement is substantially smaller than the towns of Retford (22,000) or Worksop (41,000). Its smaller size is reflected by the fact that it has a relatively limited provision of services, and does not benefit from a town-centre offering a good range of higher-order facilities. Furthermore, Harworth/Bircotes is totally without passenger rail connections, whereas Worksop railway station provides direct access to Manchester, Sheffield, Lincoln, Mansfield and Nottingham via rail, and Retford's railway stations facilitate connection to these centres, and also to London, Newark, Doncaster, Edinburgh and intervening stations on the east coast main line. Market demand is also questionable in Harworth - making the deliverability of such a major apportionment of the total housing supply somewhat questionable. In comparison, Retford benefits from strong demand. All the above factors taken into account, we therefore consider that a reduction in the residential allocation to Harworth/Bircotes should be considered, with a potential increase in Retford.

Yours faithfully,



SITE LOCATION - FAIRYGROVE NURSERIES

