

Bassetlaw Local Plan Examination

Matter 3: Employment Land

North Road, Retford (Policy HS7 and EM006)

Prepared by Fisher German LLP on behalf of The Hospital of
The Holy and Undivided Trinity

Project Title

North Road, Retford

Agent

James Beverley MRTPI

Liberty Stones MRTPI

Fisher German LLP

Contact details

The Estates Office

Norman Court

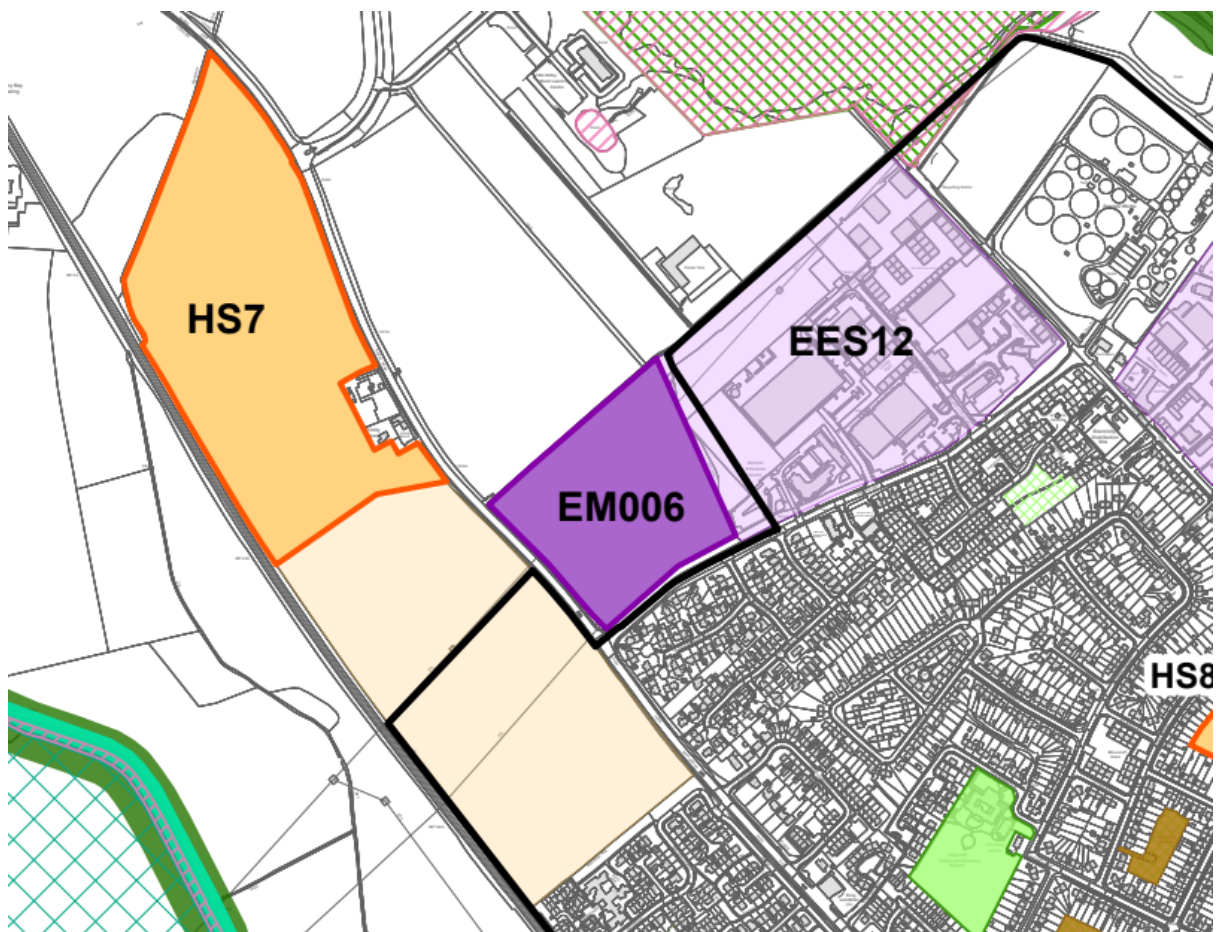
Ashby de la Zouch

LE65 2UZ

1. Introduction

1.1 This Hearing Statement has been prepared on behalf of The Hospital of The Holy and Undivided Trinity in respect of their land interests at North Road, Retford, proposed allocation HS7 and EM006, as illustrated on Figure 1.

1.2 Land immediately south of proposed allocation HS7 (buff shading on Figure 1 below) was promoted by The Hospital of The Holy and Undivided Trinity through the previously withdrawn Site Allocations Development Plan Document. An outline planning application was subsequently prepared by The Hospital of The Holy and Undivided Trinity for 196 dwellings (15/00493/OUT) and 11 hectares of employment land.



Bassetlaw Local Plan 2020-2038: Publication Version Policies Maps Composite, July 2022 (The Hospital of The Holy and Undivided Trinity Land Interests HS7 and EM006)

1.3 The residential scheme is now being built out Avant Homes (20/01477/RES), and the employment land to the east of North Road (EM006) will shortly be brought forward. There is active market

interest in proposed allocation HS7 and terms for disposal are currently being negotiated with a house builder.

- 1.4 The Hospital of The Holy and Undivided Trinity support the proposed allocations and remain committed to delivery, as evidenced by the successful delivery of the initial phase of land which is currently bringing forward high quality housing in a sustainable location to the north of Retford, one of the most sustainable settlements in Bassetlaw.
- 1.5 This Statement should be read alongside the Statement of Common Ground signed by The Hospital of the Holy and Undivided Trinity and Bassetlaw District Council.

2. Matter 3: Employment Land (Policies ST7, 9, ST10 and ST11)

Issue 3: Are the provisions of the plan in relation to the provision of employment land justified and consistent with national policy? Would the allocations be developable, deliverable and otherwise soundly based?

Q3.1: Is the supply of 183 ha of local employment land justified in order to provide for future employment needs in the district? How were the sites selected? Were they selected in comparison with possible alternatives using a robust and objective process?

- 2.1 The employment requirement proposed for the Local Plan is derived from the Icení Bassetlaw Housing & Economic Needs Assessment: Addendum (April 2022), which itself is based on the 2020 Bassetlaw HEDNA (GL Hearn). There are various approaches to establishing an employment land requirement, including past take up rates, or balancing employment land to correlate directly with anticipated labour demand growth. The GL Hearn report recommended that past take up should be used to establish the employment land requirement for B2 and B8 uses moving forward, due to uncertainties associated with the labour demand model due to difficulties in the variations of employment labour densities. It advised that B1 requirements should be based on labour demand growth models. We have no objection to this approach in principle. This resulted in an employment requirement of 186.9ha for the period 2018-37.
- 2.2 The Icení Addendum updated the requirement for the Plan period 2020-2038. On a pro-rata basis this resulted in a requirement of 196.7ha; after completions this resulted in an employment requirement of 183ha. The Icení Addendum also tested the level of housing required to ensure sufficient workforce was available within the District, which informed the Council's housing requirement. We have no objection to the approach adopted by the Council which is logical, supported by robust evidence and seeks to achieve economic growth.
- 2.3 The Council are best placed to respond in respect of the site selection process. However, as set out within this, and our other Statements, we fully support the Council's identification of our client's land for employment (EM006) and residential (HS7) purposes. EM006 already benefits from outline planning permission for employment uses. Negotiations are currently taking place to dispose of the site to an operator who will bring forward an application for a variety of proposed employment generating uses on the site. On this basis proposed allocation EM006 remains

entirely justified and sound.

Q3.1: Is the restriction to B2, B8 and Class E (g) justified for new employment allocations?

- 2.4 The proposed restriction on uses suitable for the employment sites lacks flexibility, has not been adequately justified and fails to realise the employment generating potential of other uses outside the scope of Class E (g) (former B1), B2 and B8.
- 2.5 Paragraph 81 of the NPPF sets out *“that Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on **the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development**”* [our emphasis]. Paragraph 82 of the Framework states that planning policies should be *“flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), **and to enable a rapid response to changes in economic circumstances**”* [our emphasis]. Paragraph 83 concludes that *“planning policies and decisions should recognise and address the specific locational requirements of different sectors”*.
- 2.6 The Council's proposed approach restricts the delivery of employment generating uses which are entirely appropriate on employment land; particularly a site such as EM006 which is very well related to both existing, under construction, and proposed residential development. There are employment generating uses outside of that proposed by the Policy which would be entirely appropriate here elsewhere on other sites. Ironically, many of the uses precluded by the proposed policy are likely to be higher generators of jobs than uses proposed. Uses which are considered to be entirely appropriate on EM006 include;
- E9(a) - Display or retail sale of goods, other than hot food (subject to robust assessment of town centre impacts)
 - E(d) Indoor sport, recreation or fitness
 - E(e) Provision of medical or health services (except the use of premises attached to the residence of the consultant or practitioner); and
 - E(f) Creche, day nursery or day centre (not including a residential use)
- 2.7 There are also employment generating uses within Class Sui Generis which again would be entirely appropriate, particularly when regard is had for the local population growth adjacent to the site which would reasonably serve and support uses such as nurseries, gyms or takeaways. Provision of such services in close proximity to residential growth will reduce car dependency,

increase local sustainability whilst still providing local jobs in accordance with the Council's strategy.

- 2.8 As such, we do not believe the restrictions placed on the policy are justified and thus are not sound. The policy could be made sound through a main modification enabling the development of employment generating uses instead of fixed use classes. Further protections could be added, if considered necessary, through a requirement for supporting evidence to show that non-traditional employment generating uses (i.e. uses not within B2, B8 and E(g)) will have no unacceptable impacts on town centres, existing local centres or other existing units. An alternative would be to take a site specific approach, and ensure those sites within or close to large residential areas (such as EM006) are given sufficient flexibility to provide employment generating uses ancillary to a localised, growing residential population. Given the shifts to home working since the pandemic a flexible approach to employment land is required to ensure economic growth and potential can be best realised, delivering economic growth through construction, active employment, business rates, etc. Failure to enable a flexible approach could lead to delays in delivery of economic and job growth, which is required as an overarching pillar of the Plan's spatial strategy.

3.4: Are the requirements of policies ST7 and Policy 9 clear, and would the criteria identified to assess proposals on these sites be likely to be effective?

- 2.9 Our comments in relation to this question are restricted to ST7 insofar as it relates to our client's land interests at Trinity Farm, Retford (EM006).
- 2.10 The recognition that Trinity Farm can deliver 2.7ha of employment land is supported. The land east of North Road, Retford (EM006) is adjacent to a successful employment development off Randall Way. EM006 is however also adjacent to residential development south of Randall Way and west of North Road. The location of EM006 is therefore suitable for employment generating uses that are acceptable in close proximity of residential properties, or ancillary to residential development. The location of EM006, next to North Road will appeal to many employment generating uses on the site's frontage due passing, existing, vehicle movements on North Road. In this context, we again refer to our earlier comments that the site is clearly suitable for a range of uses, inclusive of those allowed for within Policy ST7, but also wider employment generating uses. In particular employment generating uses ancillary to a growing residential population should be seen as readily acceptable, including uses such as vets, gyms, medical facilities, nursery's, etc. Policy ST7 is not justified or effective as submitted, given the strict nature of the

policy as worded which is not commensurate with the opportunities and market for sites such as EM006. Subject to wider employment generating uses being permitted we fully support the remainder of the policy and consider it is likely to function far better, resulting in quicker delivery and better economic outcomes.