



Matter 4/Representor 66/RPS for Harworth Estates

1. Introduction

- 1.1 This statement sets out the responses of Harworth Estates to the Inspectors' Matters and Issues for Examination at Hearings with respect to the Newark and Sherwood Allocation and Development Management Development Plan Document.
- 1.2 This statement therefore provides comments in response to the questions and issues raised by the Inspector and elaborates upon the representations previously raised during public consultation and in our responses to those documents.

2. Matter 4 – Retail/Employment/Mixed Use

2.1 Inspectors Question 12:

“Are the detailed requirements for each allocation clear and justified and will they ensure delivery within the planned timescale? Have site constraints, viability considerations been adequately addressed? Are the boundaries and extent of the sites correctly defined?”

- 2.2 With respect the proposed employment allocations at RA/E/1 and CI/MU/1 within the MFA, the evidence provided by Savills at Appendix 1 shows that taking into account the sites constraints neither site is viable and therefore neither is deliverable.

Inspectors Question 13:

“Are the amounts of land allocated for different uses clearly justified? Is there a reasonable prospect of the safeguarded land being used for that purpose within the life of the plan?”

- 2.3 No comment.



Inspectors Question 14:

“Are the locations identified the most appropriate when considered against all reasonable alternatives”

- 2.4 With respect to the Mansfield Fringe Area, the sites proposed to be allocated for Employment at land West of Colliery Lane(RA/E/1) and the former Clipstone Colliery (CI/MU/1) are not only non-viable and hence undeliverable, they are not the most appropriate sites for employment within the Mansfield Fringe Area, either.
- 2.5 The most appropriate site for employment within the MFA is the Former Rufford Colliery site. It is more appropriate for employment development than both the sites proposed for allocation by the Council (RA/E/1 and CI/MU/1). The reasons for this are set out in detail in our Representations (see Appendix 2)
- 2.6 The Core Strategy provides the overarching strategic plan for N&S. Policy 9 of the Core Strategy identifies that sites should be allocated in the ADM on the following basis:
- Be in or adjacent to the existing settlement;
 - Be accessible and well related to the existing facilities;
 - Be accessible by public transport, or demonstrate that the provision of such could be viably provided;
 - Be the most sustainable in terms of impact on existing infrastructure, or demonstrate that infrastructure can be provided to address sustainability issues;
 - Not impact adversely on the special character of the area, including not impacting on important open spaces and views, all designated heritage assets including listed buildings or locally important buildings, especially those identified in Conservation Area Appraisals;
 - Appropriately address the findings of the Landscape Assessments and the conservation and enhancement actions of the particular landscape policy zone(s) affected;
 - Not lead to the loss or adverse impact on important nature conservation biodiversity sites;

- Not lead to the loss of locally important open space or in the case of housing and employment, other locally important community facilities (unless adequately replaced)
 - Not be located in areas of flood risk or contribute to flood risk on neighbouring sites.
- 2.7 The Former Rufford Colliery Site scores positively against each of these criteria for the reasons set out in our Representations (see Appendix 2). By contrast, neither site RA/E/1 or CI/MU/1 score positively against all the criteria as assessed by the Council.
- 2.8 Furthermore, as no weighting is applied to the criteria, it is impossible to understand why the Council have favoured these sites over that of the Former Rufford Colliery. Indeed, the Council has refused to engage with the landowner directly, or set out the reasoning in its LDF documents.
- 2.9 Moreover, the ADM is not the most appropriate strategy available for the MFA. As set out within our Representations the most appropriate for the MFA would be:
- the allocation of a 12ha site for Employment at the Former Rufford Colliery in recognition of the sites many advantages over all other sites within the MFA including its central location and easy accessibility within the MFA;
 - the allocation of site RA/E/1 as Housing (thus negating the need for Green Belt land as proposed at present);
 - the allocation of further Housing (additional 100 dwellings plus additional POS) at site CI/MU/1 in order to assist the overall viability of the wider site and provide housing led regeneration of a settlement accepted by the Council not to be attractive for employment development.
- 2.10 Overall, this would lead to the following breakdown of employment allocation within the MFA:
- Former Rufford Colliery - 12Ha
 - Former Clipstone Colliery – 5.5Ha
 - Blidworth – 1Ha

- 2.11 This more balanced and accessible spatial distribution of employment within the MFA not only recognises the former Rufford Colliery site as the most appropriate site for Employment, but also better reflects the RS Settlement Hierarchy. It is also a highly sustainable strategy in that not only would the two largest settlements within the MFA have employment provision on sites that are accessible from the respective settlements and to the MFA as whole, but the allocation of the former Rufford Colliery site enables the site which is the most attractive site to the market, with the most potential for development, with most potential to be accessed by non-car modes of transport, in the most central and accessible location to the MFA thus reducing potential for climate change gases whilst improving social mobility and regeneration of MFA economy. In addition, it also provides employment within the smaller settlement of Blidworth.
- 2.12 Furthermore, the evidence provided by Savills at Appendix1 shows that the former Rufford colliery is the most attractive location within the market for employment within the MFA.
- 2.13 With respect to the former Clipstone Colliery site the breakdown would be as follows:
- 220 dwellings
 - 5.5 Ha of employment
- 2.14 In highways terms the evidence from BWB at Appendix 3, shows that the level of employment development proposed by the Council at the former Clipstone Colliery would have a relatively less attractive access to the strategic road network compared to the former Rufford Colliery, and would actually have an adverse impact, and would have capacity constraints which would be likely to require significant and costly highway improvements. By contrast the evidence identifies that the former Rufford Colliery is accessed from a high quality dual carriageway purpose built to be the catalyst of regeneration; has a junction which operates effectively and would not need to alter to cater for the level of employment envisaged. In addition, both BWB and Savills also identify that the access from the site West of Colliery to the MARR would render the site unviable for employment development. Overall, BWB conclude that the former Rufford Colliery site is the most sensible strategy from the perspective of highways and transport issues, and would have least impact.

- 2.15 In summary, therefore, the Council's proposed employment allocations for the MFA are not the most appropriate locations, and the proposed strategy for the MFA is not the most appropriate of all reasonable alternatives. Accordingly, the ADM is not Justified, and as such is NOT sound.
- 2.16 It is, therefore, recommended that our alternative strategy for the MFA should be accepted in order to make the ADM sound.
- 2.17 Alternatively, as the deliverability of the Council's employment allocation for the MFA are at best unproven and highly optimistic as a consequence of their dubious viability, should the alternative strategy we have identified not be recommended by the Inspector to the Council, we would advocate that the former Rufford Colliery site should be identified as 'safeguarded land' or as an alternative to provide flexibility that should the two sites favoured by the Council not deliver employment owing to their viability. Such flexibility could be on the basis of a scenario in which both RA/E/1 and CI/MU/1 are allowed to be developed for non-employment uses on the grounds that employment is unviable. Such flexibility is further necessary given that as submitted the ADM would lead to the Former Rufford Colliery site being sterilised through a designation as Countryside, and its potential far more difficult to be realised.