

REFERENCE NUMBER	ORGANISATION	COMMENTS	OFFICER RESPONSE
ST8 - Strategic Employment Sites			
1194992	Resident	Pg 59 refers to logistics businesses but infrastructure especially roads not adequate for this. Need roads to be improved maybe a motorway extension from M1 before this is possible. Need to improve movement from Newark, Lincoln and Doncaster etc also. Also stated in report earlier that there has been limited success in terms of regeneration of Worksop so why would businesses invest just down the road? There are already lots of vacant industrial units for let, should be used first before more being built.	The Bassetlaw Transport Study Part 2 considers the transport impacts of the development proposed by the Local Plan on the existing transport infrastructure, and identifies mitigation where appropriate. This does not identify the need for an extension to the M1 or improvements to any other towns outside the District as being necessary to deliver the development identified by the Local Plan. The Economic Development Needs Assessment 2019 identifies that many vacant industrial units are not fit for modern day purposes or are not situated in optimal locations to meet the needs of modern day businesses so alternative sites have to be identified.
REF198	Consultant	Policy ST8 page 59 This should be extended to include Markham Moor.	The Housing and Economic Development Needs Assessment 2020 provides the basis for defining a Strategic Employment Site. It states that there is only one site in the District capable of meeting these needs. That does not include Markham Moor.
REF255	Sheffield City Region	The Spatial Strategy set out in the Draft Bassetlaw Plan is based upon a good appreciation of the relationship between Bassetlaw and the SCR, with strong economic and social connections linking Bassetlaw and all four the South Yorkshire districts. Support the Draft Local Plan's emphasis on this relationship and the common interests it identifies, particularly in terms of the logistics corridor, and the relationship of the AI to this, as well as for opportunities to develop the major growth area around Doncaster Sheffield Airport. It will also be important to continue to work together so that the developing Local Plan and emerging SEP continue to be well aligned. In principle, support this aspect of the Draft Plan and recognise the role that the policy could play in helping to attract large scale inward investment to the benefit of South Yorkshire as well as D2N2. In practice, however, implementation needs to be more carefully considered as the Plan develops with further discussion and development to ensure that the operation of Policy ST8 meets the aims of the Draft Plan. Suggest that Policy ST8 and the site-specific Policy 9 on Apleyhead Junction (as well as supporting text) could be strengthened and improved with the inclusion of three further points: A sequential test: taking a sequential approach to assessing applications on the two strategic employment sites, ensuring that any proposals for Snape Lane and Apleyhead cannot reasonably be accommodated on existing sites in other parts of South Yorkshire and D2N2 city regions; Demonstrable added value: the need for any proposals at Snape Lane and Apleyhead to demonstrate that they will bring gross value added to both South Yorkshire and D2N2 areas, as well as locally to Bassetlaw, with specific evidence available to demonstrate this; and Comprehensive development: so that proposals at Snape Land and Apleyhead maximise their potential by seeking comprehensive development of each site, rather than piecemeal development which could be accommodated elsewhere.	Support for approach welcome. Acknowledge that further work with SCR is needed moving forward in relation to large scale investment at Apleyhead. Following consideration of the three recommendations it is not considered that a sequential test is evidence based and can be justified. Effectively the proposal is requesting that sites in Sheffield City Region be prioritised which is considered to be unjust and without merit. The policy does require schemes to bring gross value added to the District but D2N2 and Sheffield City Region will be added. To maximise the gross value added to both sub regions it is important that the policy approach is flexible to ensure the right end user(s) are secured. A phased development may help achieve greater economic benefits to the sub-regions.

REFERENCE NUMBER	ORGANISATION	COMMENTS	OFFICER RESPONSE
ST8 - Strategic Employment Sites			
REF256	Barnsley Metropolitan Borough Council	<p>Specific amendments are requested below to policy ST8: Strategic Employment Sites. Requested changes are highlighted in red with proposed deletions shown struck through and proposed additions underlined. As currently drafted in respect of Part B criterion 3, the supporting text does not provide sufficient guidance on how this criterion would be satisfied by a developer. We are seeking the rewording of this criterion. Suggest that the policy should focus on comprehensive rather than piecemeal developments. Paragraph 6.3.5 in the supporting text refers to planning permission being granted at SEM2 Snape Lane. Welcome clarity on whether this permission is for the full site. A. Development proposals for strategic employment development within the B use classes, either as a standalone proposal or an extension of an existing business, will be supported considered on land at: 1. SEM1: Apleyhead Junction, Worksop (118.7ha) for logistics 2. SEM2: Snape Lane, Harworth (80.9ha) for B2, B8 B. Proposals will be supported where it can be demonstrated through an economic assessment, that all of the following apply: 1. There are significant economic benefits generated by the scheme, in terms of development value and gross value added for the District, Sheffield City Region and D2N2; 2.The development would provide a significant number of new, permanent jobs, including a significant proportion of highly skilled jobs; 3. The proposal does not compromise the economic growth of authorities in the D2N2 or the Sheffield City Region, or the priorities of the D2N2 Strategic Economic Plan or the Sheffield City Region Strategic Economic Plan; In the case of a major inward investment, the needs of the business cannot be reasonably met on allocated employment land within either D2N2 or Sheffield City Region. 4. In the case of an existing Bassetlaw business seeking to expand significantly: the needs of the business cannot be reasonably met on other allocated employment land within the District; 5. The proposal would not compromise the viability or deliverability of sites allocated for development that are identified within Policy ST6; and 6. The development can be satisfactorily accommodated in relation to the capacities of critical infrastructure, and timescales associated with investment works. C. Use of a Planning Performance Agreement will ensure that a dedicated, specialist officer team is in place to progress each site through the planning system. P 58 supporting text 6.3.1 The National Planning Policy Framework4 requires policies to recognise and address specific locational requirements of different sectors, including provision for storage and distribution operations at a variety of scales and in suitably accessible locations. 6.3.2 Policy ST8 identifies sites capable of accommodating significant indigenous growth and national and regional investment to meet exceptional, unanticipated needs over the plan period. Consistent with national planning practice guidance11 this Plan recognises that the logistics industry has distinct locational requirements that should be considered separately from those relating to general employment land. 6.3.3 On that basis, Bassetlaw’s existing employment land portfolio and allocations in Policy ST6 must remain the focus for the District’s general business development. This will ensure this Plan delivers a sustainable spatial strategy and a balanced approach to housing and economic growth. 6.3.4 The Economic Development Needs Assessment2 recognises the need for further land to support strategic distribution in the District. Bassetlaw benefits from being within the A1 and the A57 corridors and in relatively close proximity to the M1: a logistically favourable location. This is reinforced by the Sheffield City Region who identify Harworth as being within the Doncaster Airport Growth Area for logistics as well as the A1 logistics corridor1.6.3.5 Market interest also reinforces the policy approach. There is a growing demand for transport and distribution in the District: DHL are developing 50,005sqm of distribution floorspace on the A57, close to the A1; a speculative development of 32,377 sqm B8 floorspace was completed at EM004: Symmetry Park, Harworth; and full planning permission has recently been approved for logistics at SEM2: Snape Lane, Harworth.6.3.6 On that basis, Policy ST8 allocates two sites to provide for strategic distribution operations, specifically non rail served provision. This will help diversify the District’s economy, increase local employment and reduce unemployment levels locally. Evidence2 indicates that SEM2:Snape Lane, Harworth should be considered as meeting a sub-regional level of demand which is attributable to the A1M, spilling over from the Doncaster market / M18 interchange. Meanwhile SEM1: Apleyhead Junction (Policy 9) forms a logical extension to the existing longstanding and expanding logistics sector along the A57 corridor, at a key junction with the A1.6.3.7 An important part of planning for strategic</p>	<p>The whole of Snape Lane has planning permission for B1, B2, B8 uses. Acknowledge that further work with SCR and neighbouring authorities is needed moving forward in relation to large scale investment at Apleyhead. Following consideration of the three recommendations it is not considered that a sequential test is evidence based and can be justified. Effectively the proposal is requesting that sites in Sheffield City Region be prioritised which is considered to be unjust and without merit. The policy does require schemes to bring gross value added to the District but D2N2 and Sheffield City Region will be added. To maximise the gross value added to both sub regions it is important that the policy approach is flexible to ensure the right end user(s) are secured. A phased development may help achieve greater economic benefits to the sub-regions.</p>

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ST8 - Strategic	Employment Sites		
		<p>logistics investment is consideration of the functional economic market area (FEMA). The FEMA reflects the way the economy works; it is not constrained by administrative boundaries the relationships between where people live and work, the scope of service market areas and catchments.6.3.8 The Economic Development Needs Assessment2 recognises that parts of Bassetlaw are strongly related to the Sheffield City Region, but that other parts of the District have equally strong links to parts of Nottinghamshire and Lincolnshire.6.3.9 The Council has signed a Statement of Common Ground with the Sheffield City Region Combined Authority12. This acknowledges that each Council is responsible for identifying employment needs and land supply to meet their own economic needs and growth priorities. It adds that the approach taken to the FEMA in the Economic Development Needs Assessment2 – that at a practical, local level Bassetlaw does not have a separate FEMA in its own right – should be recognised.6.3.10 However, the Statement of Common Ground12 adds that the authorities should work collaboratively to give further consideration to formalising a strategic FEMA for the Sheffield City Region and understanding the operation of it primarily for logistics. On that basis the Council will continue to work collaboratively to ensure any benefits associated with this policy are not lost to the City Region at a strategic level, and at a local level do not adversely impact upon the economic growth strategies of the District or any other authority.</p>	
REF269	Rotherham Metropolitan Borough Council	<p>Specific amendments are requested below to policy ST8: Strategic Employment Sites. Requested changes are highlighted in red with proposed deletions shown struck through and proposed additions underlined. As currently drafted in respect of Part B criterion 3, the supporting text does not provide sufficient guidance on how this criterion would be satisfied by a developer. We are seeking the rewording of this criterion. Suggest that the policy should focus on comprehensive rather than piecemeal developments. Policy ST8 A. Development proposals for strategic employment development within the B use classes, either as a standalone proposal or an extension of an existing business, will be supported considered on land at: 1. SEM1: Apleyhead Junction, Worksop (118.7ha) for logistics 2. SEM2: Snape Lane, Harworth (80.9ha) for B2, B8 B. Proposals will be supported where it can be demonstrated through an economic assessment, that all of the following apply: 1. There are significant economic benefits generated by the scheme, in terms of development value and gross value added for the District, Sheffield City Region and D2N2; 2.The development would provide a significant number of new, permanent jobs, including a significant proportion of highly skilled jobs; 3. The proposal does not compromise the economic growth of authorities in the D2N2 or the Sheffield City Region, or the priorities of the D2N2 Strategic Economic Plan or the Sheffield City Region Strategic Economic Plan; In the case of a major inward investment, the needs of the business cannot be reasonably met on allocated employment land within either D2N2 or Sheffield City Region. 4. In the case of an existing Bassetlaw business seeking to expand significantly: the needs of the business cannot be</p>	<p>Acknowledge that further work with SCR and neighbouring authorities is needed moving forward in relation to large scale investment at Apleyhead. Following consideration of the three recommendations it is not considered that a sequential test is evidence based and can be justified. Effectively the proposal is requesting that sites in Sheffield City Region be prioritised which is considered to be unjust and without merit. The policy does require schemes to bring gross value added to the District but D2N2 and Sheffield City Region will be added. To maximise the gross value added to both sub regions it is important that the policy approach is flexible to ensure the right end user(s) are secured. A phased development may help achieve greater economic benefits to the sub-regions.</p>

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ST8 - Strategic	Employment Sites	<p>reasonably met on other allocated employment land within the District; 5. The proposal would not compromise the viability or deliverability of sites allocated for development that are identified within Policy ST6; and 6. The development can be satisfactorily accommodated in relation to the capacities of critical infrastructure, and timescales associated with investment works. C. Use of a Planning Performance Agreement will ensure that a dedicated, specialist officer team is in place to progress each site through the planning system. P.58 Supporting Text 6.3.1 The National Planning Policy Framework⁴ requires policies to recognise and address specific locational requirements of different sectors, including provision for storage and distribution operations at a variety of scales and in suitably accessible locations. 6.3.2 Policy ST8 identifies sites capable of accommodating significant indigenous growth and national and regional investment to meet exceptional, unanticipated needs over the plan period. Consistent with national planning practice guidance¹¹ this Plan recognises that the logistics industry has distinct locational requirements that should be considered separately from those relating to general employment land. 6.3.3 On that basis, Bassetlaw's existing employment land portfolio and allocations in Policy ST6 must remain the focus for the District's general business development. This will ensure this Plan delivers a sustainable spatial strategy and a balanced approach to housing and economic growth. 6.3.4 The Economic Development Needs Assessment² recognises the need for further land to support strategic distribution in the District. Bassetlaw benefits from being within the A1 and the A57 corridors and in relatively close proximity to the M1: a logistically favourable location. This is reinforced by the Sheffield City Region who identify Harworth as being within the Doncaster Airport Growth Area for logistics as well as the A1 logistics corridor¹. 6.3.5 Market interest also reinforces the policy approach. There is a growing demand for transport and distribution in the District: DHL are developing 50,005sqm of distribution floorspace on the A57, close to the A1; a speculative development of 32,377 sqm B8 floorspace was completed at EM004: Symmetry Park, Harworth; and full planning permission has recently been approved for logistics at SEM2: Snape Lane, Harworth. Paragraph 6.3.5 in the supporting text refers to planning permission being granted at SEM2 Snape Lane. We would welcome clarity on whether this permission is for the full site. 6.3.6 On that basis, Policy ST8 allocates two sites to provide for strategic distribution operations, specifically non rail served provision. This will help diversify the District's economy, increase local employment and reduce unemployment levels locally. Evidence² indicates that SEM2: Snape Lane, Harworth should be considered as meeting a sub-regional level of demand which is attributable to the A1M, spilling over from the Doncaster market / M18 interchange. Meanwhile SEM1: Apleyhead Junction (Policy 9) forms a logical extension to the existing longstanding and expanding logistics sector along the A57 corridor, at a key junction with the A1. 6.3.7 An important part of planning for strategic logistics investment is consideration of the functional economic market area (FEMA). The FEMA reflects the way the economy works; it is not constrained by administrative boundaries the relationships between where people live and work, the scope of service market areas and catchments. 6.3.8 The Economic Development Needs Assessment² recognises that parts of Bassetlaw are strongly related to the Sheffield City Region, but that other parts of the District have equally strong links to parts of Nottinghamshire and Lincolnshire. 6.3.9 The Council has signed a Statement of Common Ground with the Sheffield City Region Combined Authority¹². This acknowledges that each Council is responsible for identifying employment needs and land supply to meet their own economic needs and growth priorities. It adds that the approach taken to the FEMA in the Economic Development Needs Assessment² – that at a practical, local level Bassetlaw does not have a separate FEMA in its own right – should be recognised. 6.3.10 However, the Statement of Common Ground¹² adds that the authorities should work collaboratively to give further consideration to formalising a strategic FEMA for the Sheffield City Region and understanding the operation of it primarily for logistics. On that basis the Council will continue to work collaboratively to ensure any benefits associated with this policy are not lost to the City Region at a strategic level, and at a local level do not adversely impact upon the economic growth strategies of the District or any other authority.</p>	

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REF270	Barton Willmore	Land to the south of Snape Lane, Harworth has been promoted for circa 81ha of employment land and has been granted outline planning permission (LPA Reference: 15/00971/OUT) on 14th March 2017. A subsequent S.73 Application (LPA Reference: 19/00886/VOC) was supported at the Council's Planning Committee of 6th November 2019 and is subject to the signing of a S.106. Overall, we are supportive of the draft Local Plan's economic aspirations for Bassetlaw. Policy ST8 identifies sites capable of accommodating significant economic growth over the plan period. The 2019 EDNA recognises the need for further land to support strategic manufacturing and distribution sectors, and Bassetlaw benefits from its strategic highways within the A1 and A57 corridors and proximity to the M1. Strongly support the Council's approach to strategic employment growth across the district and support the strategic employment allocation for 'SEM2' which relates to our Client's site to the south of Snape Lane in Harworth. Harworth is identified as an employment growth area and the SEM2 allocation for 80.9ha of B2 and B8 uses at will generate considerable economic and employment growth within the District. Welcome this allocation as a strategic employment site and emphasise the role of our Client's site for driving forward economic growth and employment opportunities in Harworth and the District as a whole.	Support noted and welcome.
REF282	National Trust	National Trust also objects to Policy ST8. Part B.3 of the policy states that proposals will be supported provided that they do not compromise the economic growth of authorities in the D2N2 or the Sheffield City Region. We suggest that this ought to be established upfront (i.e. in justifying any land allocation) and also ought to take account of the potential for a large greenfield allocation to compromise brownfield development elsewhere.	D2N2 have confirmed their support for the site for footloose investment. As a site for such investment it is difficult to know upfront which company(s) would be developing the site. It is on that basis that this criteria is needed. The Plan supports the positive re-use of brownfield land. But to accommodate the growth required some greenfield land is necessary.

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REF346	Doncaster Council	<p>Specific amendments are requested below to policy ST8: Strategic Employment Sites. Requested changes are highlighted in red with proposed deletions shown struck through and proposed additions underlined. As currently drafted in respect of Part B criterion 3, the supporting text does not provide sufficient guidance on how this criterion would be satisfied by a developer. We are seeking the rewording of this criterion. We suggest that the policy should focus on comprehensive rather than piecemeal developments. Paragraph 6.3.5 in the supporting text refers to planning permission being granted at SEM2 Snape Lane. We would welcome clarity on whether this permission is for the full site. A. Development proposals for strategic employment development within the B use classes, either as a standalone proposal or an extension of an existing business, will be supported considered on land at: 1. SEM1: Apleyhead Junction, Worksop (118.7ha) for logistics 2. SEM2: Snape Lane, Harworth (80.9ha) for B2, B8 B. Proposals will be supported where it can be demonstrated through an economic assessment, that all of the following apply: 1. There are significant economic benefits generated by the scheme, in terms of development value and gross value added for the District, Sheffield City Region and D2N2; 2.The development would provide a significant number of new, permanent jobs, including a significant proportion of highly skilled jobs; 3. The proposal does not compromise the economic growth of authorities in the D2N2 or the Sheffield City Region, or the priorities of the D2N2 Strategic Economic Plan or the Sheffield City Region Strategic Economic Plan; In the case of a major inward investment, the needs of the business cannot be reasonably met on allocated employment land within either D2N2 or Sheffield City Region. 4. In the case of an existing Bassetlaw business seeking to expand significantly: the needs of the business cannot be reasonably met on other allocated employment land within the District; 5. The proposal would not compromise the viability or deliverability of sites allocated for development that are identified within Policy ST6; and 6. The development can be satisfactorily accommodated in relation to the capacities of critical infrastructure, and timescales associated with investment works. C. Use of a Planning Performance Agreement will ensure that a dedicated, specialist officer team is in place to progress each site through the planning system.</p>	<p>The whole of Snape Lane has planning permission for B1, B2, B8 uses. Acknowledge that further work with SCR and neighbouring authorities is needed moving forward in relation to large scale investment at Apleyhead. Following consideration of the three recommendations it is not considered that a sequential test is evidence based and can be justified. Effectively the proposal is requesting that sites in Sheffield City Region be prioritised which is considered to be unjust and without merit. The policy does require schemes to bring gross value added to the District but D2N2 and Sheffield City Region will be added. To maximise the gross value added to both sub regions it is important that the policy approach is flexible to ensure the right end user(s) are secured. A phased development may help achieve greater economic benefits to the sub-regions.</p>

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REF347	NJL Consulting	<p>Policy ST8 carries forward the key employment land thread from ST1 and ST6 and identifies the Apleyhead Junction site as being suitable for employment uses. Although this strategic objective is fully supported and critical to the delivery of the economic vision for the District, Caddick are concerned that the detailed policy wording and the inconsistencies between policies as already identified for Policies ST1 and ST6 will serve to frustrate the much needed delivery of the site. ST8 – Part A There are inconsistencies within ST8 which must be corrected. Part A of Policy ST8 supports ‘strategic employment development within the B use classes’, whereas Part A1 then identifies the site as being suitable for ‘logistics’. This latter reference in Part A1 is presumably an error as delivering only logistics uses on the site would not achieve the mix of employment and ‘significant proportion of highly skilled jobs’ sought in Part B(2). That is not to say that a logistics only development cannot provide highly skilled jobs, more that it is self-evident that a wider range of employment uses is likely to deliver a wider range of jobs. Part A of ST8 should therefore be amended at Part A1 to reflect that the site could deliver a mixed B1(c)/B2/B8 (with ancillary B1(a)) Use development in order to maximise the significant benefits of development. ST8 – Part B This part of the policy is unclear as it could be read either that Part B refers to the requirements for sites identified in Part A or that Part B refers to further strategic proposals. We have presumed the former applies (that Part B refers to the sites listed in Part 1) and is commented upon on that basis. Caddick is concerned that Part B of Policy ST8 contains unrealistic and onerous expectations at too early a stage in the planning process. Several policy points in Part B are understandable, but it could prove to be very onerous for a major strategic site to be brought forward through an outline planning application and still be required to demonstrate accordance with specified criteria. Equally the requirements set out in Part B could discourage potential investors that the need to meet the requirements set out in B1-6 could introduce significant uncertainty and delay into the planning process. Part B states ‘Proposals will be supported where it can be demonstrated through an economic assessment, that all of the following apply’ (NJL Consulting emphasis) and then lists a range of policy and development aspirations. Part B – point 2 Of note, point 2 requires ‘...the development would provide a significant number of new, permanent jobs, including a significant proportion of highly skilled jobs...’. A development of this scale (4.5m sqft) is likely to be delivered in part through a hybrid or outline planning application with a portion of the site therefore being promoted ‘speculatively’ with occupiers for only the early phase. The type of jobs created will only be known once an occupier is in place and therefore the mix of jobs across the site is simply too variable to be demonstrated at this stage in the planning process. Major sites, such as Apleyhead Junction, will attract a wide variety of companies because of the type of product that can be delivered here as compared to other employment locations within the district. Modern day employment floorspace that is likely to be attracted to the site will incorporate a wide cross section of jobs ranging from manual positions to highly qualified employees. Terms such as “a significant proportion of highly skilled jobs” are inappropriate because they are inflexible and over-prescriptive, and the effect would be to deter much needed investment. Therefore, Caddick would strongly urge that criterion B2 be removed in its entirety or altered to remove reference to “a significant proportion of highly skilled jobs”.</p>	<p>The Housing and Economic Development Needs Assessment 2020 provides the basis for the approach taken to policy development. This site is identified is additional to local employment needs and is proposed for allocation on that basis. Terminology will be addressed to ensure consistency in approach. It is understood that at outline stage end users may not be in place and that flexibility is required to ensure end users have the confidence to invest in the site. But in order to allocate this site for strategic employment uses the Local Plan must ensure that relevant criteria are identified to provide certainty with delivery differentiate this site from the general supply. Reference to a significant proportion of higher skilled jobs will be amended to including higher skilled jobs, to reflect the priorities of the Council Plan and the objectives of the Local Plan.</p>
REF347	NJL Consulting	<p>Part B – Points 3, 4 and 5 7.12 The rationale and evidence base to support the release of sites in Policy ST8 provides the justification for the need for the allocation to be delivered as part of the overall economic objectives of the Plan. The strategic employment sites in Policy ST8 are an integral and vital part of delivering a step change in the future growth of the District and the delivery of these sites compliments the overall employment strategy. 7.13 The very nature of the site in terms of locational importance and size will dictate that it is specifically geared to delivering large scale commercial units that would not be attracted to the sites set out under Policy ST6. Unnecessary and counterproductive to refer to the development of sites in Policy ST8 as needing to demonstrate that they would neither compromise the economic strategy of adjoining authorities nor the delivery of alternative sites within Bassetlaw as set out in Policy ST6, since this, by its very nature, would undermine the whole rationale for Policy ST8. The wording of Point 4 and Point 5 effectively introduces a form of sequential testing to demonstrate that no other site in Policy ST6 would be</p>	<p>The Housing and Economic Development Needs Assessment 2020 provides the basis for the approach taken to policy development. This site is identified is additional to local employment needs and is proposed for allocation on that basis. Terminology will be addressed to ensure consistency in approach. It is understood that at outline stage end users may not be in place and that flexibility is required to ensure end users have the confidence to invest in the site. But in order to allocate this site for strategic employment uses the Local Plan must ensure that relevant criteria are identified to</p>

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