

BASSETLAW LOCAL PLAN

EXAMINATION OF THE BASSETLAW LOCAL PLAN 2020 – 2038

Response to Matters, Issues and Questions for the Examination

Submitted on behalf of Caddick Developments Ltd

MATTER 2

**VISION & OBJECTIVES, SPATIAL STRATEGY & LOCATION OF NEW
DEVELOPMENT, AND THE SITE SELECTION PROCESS**

(POLICIES ST1 AND ST2)

Introduction

- 1.1 This submission is made on behalf of Caddick Developments Ltd. Caddick is promoting land at Apleyhead Junction (site SEM001) for approximately 4.7m sqft of employment uses (predominantly B8, with elements of B2, and ancillary offices), which is identified as a strategic allocation in the draft plan. Caddick has made representations at all stages of the plan, and this MIQ response should be read in conjunction with those representations.
- 1.2 A signed Statement of Common Ground between Caddick and the Council is available in the Examination Library.

ISSUE 2 – ARE THE PROVISIONS OF THE PLAN IN RELATION TO THE SPATIAL STRATEGY & LOCATION OF NEW DEVELOPMENT JUSTIFIED AND CONSISTENT WITH NATIONAL POLICY?

2.1 Is the proposed spatial strategy and the distribution of development (as set out in policies ST1 and ST2) supported by robust and up-to-date evidence and otherwise soundly based? In particular:

a) Does it reflect the vision and objectives of the plan?

- 1.3 Caddick consider policy ST1 is sound from an employment development perspective.
- 1.4 From an employment perspective, the policies reflect the plan's vision and objectives, in particular Strategic Objective 3 of:

'... a step change in the local economy by promoting competitive, diverse and sustainable economic growth by providing the right conditions, land and premises in the District to accommodate general employment growth, to cater for inward investment and, also at a sub-regional/regional scale to contribute to meeting an identified need in the large-scale logistics sector, thereby helping to reduce out-commuting, create more better paid and higher skilled jobs and education and training opportunities to meet local employment needs and aspirations'
- 1.5 Evidently, the allocation of a strategic site at Apleyhead is entirely aligned with this vision. A site of this scale will deliver very significant benefits to the District and is located in exactly the type of location needed to attract inward investment and deliver on a range of other plan visions and objectives.
- 1.6 In this context, it is relevant to note the significant economic benefits of both industrial and logistics development and specifically development at Apleyhead. Indeed, Apleyhead alone could deliver upward of £300m economic output per annum once full operational and support a significant number of jobs (both directly and indirectly) in Bassetlaw in a key growth sector

for the District and Region. This fully aligns with the economic growth agenda at a national, regional, LEP and local level, providing a strategic scale site capable of attracting significant inward investment from key priority sectors and thereby contributing to increased economic growth and productivity.

- 1.7 In terms of the jobs created at the site, recent evidence shows the industrial and logistics sector provides a very wide range of jobs with a range of skill sets. There is often a misconception around the type and number of jobs generated by the logistics sector. As a service-led industry where price is constrained, the logistics sector is adding value by including other processes within the logistics offer. Logistics companies are broadening the services they provide to include production, transport and in some cases short-term finance around goods and products. This means modern logistics facilities require a range of employees including warehouse workers (many of whom are highly skilled operatives), managers, office and administration staff, and drivers. Indeed, the scale of some operations mean an individual site can often operate akin to a standalone business with the full range of office and managerial functions.
- 1.8 Jobs in the sector are often unfairly classified as being 'lower skilled occupations' which leads to a misleading assessment of the sector. Many employees within these areas require significant training and external theory and practical examination in order to be suitable for the role, for example, powered fork-lift truck, van, and lorry drivers. Warehouse operatives would also fall within these definitions, whereas increasingly this is a skilled role, using sophisticated ICT. This are all highly transferrable skills which can add to the productivity of an overall workforce within a wide geographical area.
- 1.9 Indeed, modern warehouses typically include approximately 5% of the total floorspace as offices. Research undertaken by Prologis shows that there has been a steady rise in the proportion of office staff employed in distribution warehousing since 2003, with the latest figures showing that 25% of employees are performing office-based roles (a significant increase on 13% in 2014).
- 1.10 Clearly, therefore, a site of this scale can provide significant economic gains which, in the context of this MIQ, are entirely aligned with the local plan vision and objectives.
- 1.11 Caddick's Matter 2 and Matter 3 responses provide further detail on the need for and benefits of this strategic site in employment terms.

b) To what degree is the spatial framework in Policy ST2 based on the settlement hierarchy in Policy ST1? Is the focus on strategic allocations in the larger urban settlements justified and soundly based?

- 1.12 Caddick has no particular comments in respect of ST2 which addresses housing growth and ST1 but reserves the option to comment further following MIQ responses by others
- 1.13 Caddick presume the second question regarding strategic allocations relates to strategic housing allocations rather than all strategic allocations (Apleyhead is a strategic employment allocation). Nevertheless, for the reasons set out in response to MIQ 2.1(c) (below) Caddick consider it entirely sound in this instance to locate strategic allocations, such as Apleyhead, in locations well related to the larger settlements, such as Worksop, where there such growth can support existing facilities, services, and infrastructure, whilst also proportionately providing new or contributing towards improvement in existing facilities, services, and infrastructure particularly where such improvements may not be delivered without new development (and therefore investment). The benefits to Apleyhead from being next to Worksop in terms of employment opportunities is symbiotic.

c) Would the pattern of development proposed meet the needs of larger settlements in the district? In preparing the plan did the Councils engage constructively, actively and on an on-going basis with neighbouring authorities and other relevant organisations on cross-boundary issues, in respect of the Duty to Co-operate?

- 1.14 It is entirely correct the plan focusses growth to Worksop as the largest 'Main Town' in the first instance as a settlement with, for example, an existing large residential population, existing facilities and services, good public transport links, and accessible and available land in suitable locations. In particular, land east of Worksop (i.e., Apleyhead) is in a highly accessible location close to the strategic road network and is not constrained by Green Belt. This means development within and close to Worksop is able to benefit from these existing services and infrastructure whilst providing local improvements commensurate to the scale of development.
- 1.15 The locational characteristics and requirements for large scale developments such as Apleyhead are detailed within our Matter 3 response, in relation to employment needs and sites. However, it is critical to note that proximity to an accessible and suitably skilled work force is a fundamental requirement for large-scale occupiers. Many occupiers will be attracted to a location by the proximity of labour, along with access to the strategic road network. Worksop meets these key criteria making it a highly attractive location (as evidenced by the existing large scale developments along the A57 to the south of Worksop).

1.16 The appended reports by Savills provide further commentary on the employment land (and particularly logistics) market, and these reports demonstrate the appropriateness of Apleyhead and the importance of the location close to a larger settlement.

1.17 Furthermore, these conclusions in respect of large scale employment sites and proximity to labour are reinforced throughout the evidence base including:

- Bassetlaw Sustainability Appraisal Report (May 2022) and particularly the alternative options appraisals (PUB-024).
- A1 Corridor Assessment and subsequent update (documents TI-014 and TI-016).
- Sheffield City Region Strategic Employment Land Appraisal Summary Report (May 2020) (document EX-021).
- Bassetlaw Housing and Economic Development Needs Assessment (May 2022) (document SS-024).
- Site Selection Methodology and Updates (May 2022) (document SS-025).
- Land Availability Assessment (May 2022) (document BG-030).

1.18 Hence it is entirely correct to allocate land at Apleyhead for the proposed uses, and for policy ST1 to identify the opportunity. In simple terms, this scale of development cannot be located anywhere else in the District and proximity to a large settlement is key.

2.2 What is the evidential basis for the settlement hierarchy in policy ST2? Does this accurately reflect the pattern of settlements across the district? Is this up-to-date? How does this inform the development strategy? What other factors influenced the strategy, such as physical and environmental constraints?

1.19 Caddick has no particular comments in respect of ST2 but reserves the option to comment further following MIQ responses by others.

2.3 What other spatial strategies and distributions of growth were considered during plan preparation, and why discounted? Where is the evidence for this? Were alternative approaches tested in the Sustainability Appraisal work?

1.20 The plan evidence base considers a number of other spatial strategies and distributions of growth. In the context of strategic employment needs, whilst the evidence base considers alternative options it is clear there are no reasonable alternatives as Apleyhead is a unique opportunity. There are no other sites in Bassetlaw which can meet the same market requirements nor any other sites which can deliver even similar economic growth in a

sustainable manner (for the reasons set out in Caddick's Matter 3 response and summarised under question 2.3(b)).

2.4 Do policies ST1 and ST2 allow sufficient development in large rural settlements, small rural settlements and other villages to comply with para 79 of the Framework? How were the proportions of development proposed for each settlement arrived at?

- 1.21 Caddick has no particular comments in respect of this matter but reserves the option to comment further following MIQ responses by others.

2.5 Are the proposed settlement development boundaries appropriately drawn? What factors were taken into account in designating these? Is the approach taken in relation to settlement boundaries in Small Rural Settlements justified and consistent with national policy?

- 1.22 Caddick has no particular comments in respect of this matter but reserves the option to comment further following MIQ responses by others.

2.6 Have the sites allocated for development in the plan been appraised and selected in comparison with possible alternatives using a robust and objective process?

- 1.23 Caddick has responded on strategic matters in the Matter 1 response and site-specific matters related to Apleyhead (Policy 9) are addressed in the Matter 3 response.
- 1.24 The Council has undertaken a detailed site appraisal and selection process as set out in the various Site Selection Methodology documents (see document SS-025). Apleyhead has been selected following this process, which recognises the unique and significant benefits of development on the site and the key characteristics (proximity to A1, proximity to suitable workforce, existing screening to the south/west) which make the site suitable.
- 1.25 The site specific matters in relation to the need for the development and the appropriateness of the location are detailed in Caddick's Matter 3 response. Fundamentally, as detailed in the Matter 1 and Matter 3 responses, there are no other sites which can meet these key criteria and provide high quality employment land over the short, medium and long term. Whilst other large sites are identified in the plan (e.g., Snape Lane, Bevercotes Colliery, etc.) these sites are now either 'under offer' or occupied, cannot meet the same market requirements that can be accommodated on Apleyhead, or are less well located in terms of proximity to a junction on the strategic road network and/or proximity to accessible labour.

2.7 Are the plans assumptions in relation to the amounts and timing of development to be delivered through neighbourhood plans and the Worksoop Central Development Plan soundly based?

- 1.26 Caddick has no particular comments but reserves the option to comment further following MIQ responses by others.

2.8 Are policies ST1 and ST2 otherwise justified and consistent with national policy? Are there any omissions in the policies and are they sufficiently flexible?

- 1.27 Caddick consider the policies are justified and consistent with national policy. As detailed in document TI-014 (pages 7 and 8) and TI-016, there is a clear national drive to deliver sufficient employment land of the type required to meet occupier requirements in optimal locations. From an employment land perspective, the NPPF advocates (in summary) a proactive approach to; economic growth, identifying sites for inward investment, meeting needs, and providing a flexible approach which responds to changing circumstances (paragraphs 81 and 82).

- 1.28 NPPF paragraph 83 is then clear:

'Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for... storage and distribution operations at a variety of scales and in suitably accessible locations'

- 1.29 Planning Practice Guidance is similar clear (Paragraph: 031 Reference ID: 2a-031-20190722):

'The logistics industry plays a critical role in enabling an efficient, sustainable and effective supply of goods for consumers and businesses, as well as contributing to local employment opportunities, and has distinct locational requirements that need to be considered in formulating planning policies (separately from those relating to general industrial land).

'Strategic facilities serving national or regional markets are likely to require significant amounts of land, good access to strategic transport networks, sufficient power capacity and access to appropriately skilled local labour...'

- 1.30 The approach, within ST1 of in identifying Apleyhead as a strategic opportunity is entirely consistent with national policy and it is entirely sound for the plan to identify land at Apleyhead as a strategic employment site which is capable of supporting the plan wide ambitions for a 'step change' in economic conditions in the District.

- 1.31 The justification for the allocation of Apleyhead, and therefore the additional strategic employment land supply, is set out principally in the Council's Housing & Economic

Development Needs Assessment (May 2022) (document SS-024), the A1 Corridor Logistics Assessment and Update (documents TI-014 and TI-016) along with the appended the Savills Report. In turn, this element of ST1 is entirely justified.

2.9 Do the vision and objectives of the plan adequately address matters of climate change and air quality?

- 1.32 Caddick has no particular comments but reserves the option to comment further following MIQ responses by others.

2.10 Are the Council's proposed modifications to the policies necessary for soundness?

- 1.33 Caddick has no comments on the proposed modifications to policies ST1 and ST2.