

Network Space

Bassetlaw Local Plan Examination

Hearing Statement – Matter 2

November 2022



01 Introduction

Introduction

- 1.1 This is a Hearing Statement prepared by Spawforths on behalf of Network Space Developments Ltd (Network Space) in respect of:
 - Matter 2: Vision & Objectives, Spatial Strategy & Location of New Development, and the Site Selection Process
- 1.2 Network Space has significant land interests in the area and has made representations to earlier stages of the Local Plan process.
- 1.3 The Inspector's Issues and Questions are included in **bold** for ease of reference. The following responses should be read in conjunction with Network Space's comments upon the Bassetlaw Local Plan 2020-2038 Publication Addendum and Second Addendum Version, dated February and June 2022.
- 1.4 Network Space has also expressed a desire to attend and participate in Matter 2 of the Examination in Public.

02 Matter 2 – Vision & Objectives, Spatial Strategy & Location of New Development, and the Site Selection Process

Issue

- 2.1 Are the provisions of the plan in relation to the Spatial Strategy & Location of New Development justified and consistent with national policy?

Questions

Question 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?

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?

c) Would the pattern of development proposed meet the needs of larger settlements in the district?

- 2.2 There is a national imperative to facilitate and deliver economic growth in the United Kingdom. This economic imperative is embedded within national planning policy through The Framework. Paragraph 8 of The Framework establishes the three overarching objectives of the Planning system, economic, social and environmental. The economic objective is concerned with ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity. Paragraph 81 seeks to ensure that policies and decisions create the right conditions in which businesses can invest, expand and adapt. The Framework considers that an area should build on its strengths, counter any weaknesses and address the challenges of the future. Furthermore, The Framework confirms that the specific locational requirements of different sectors should be recognised and addressed by policies and decisions, this includes making provision for “storage and distribution operations at a variety of scales and in suitably accessible locations”.
- 2.3 Network Space note that Policy ST1 bullet point f states that 196ha of employment land will be allocated and that Apleyhead is not included within that as it is meeting a separate regional/sub-regional employment need.
- 2.4 The April 2022 HEDNA Update shows the supply position at 189.4ha, which is below the HEDNA requirement of 196.7ha. Furthermore, Policy ST7 identifies 188.8ha gross employment supply, with residual available of 183.2ha.
- 2.5 Network Space would like to emphasise that a lower employment land supply in general employment land does not provide flexibility in meeting a target and does not provide the range and choice need to meet overall employment land requirements. The general employment land identified in the Plan is insufficient and will harm the local economy.
- 2.6 It is interesting that the Council has identified the Manton Wood employment site, which Network Space gained planning permission for in 2015 and has largely been developed. Network Space welcome this being identified as an employment site, but consider that the incorrect boundary has been identified and the entirety of Manton Wood Distribution Park should be included, which incorporates the extension land to the east.
- 2.7 Network Space maintain their position from earlier representations to the Bassetlaw Local Plan Review that there is significant potential for the levels of economic growth, to be exceeded and achieve above trend growth as a result of interventions proposed in the Build Back Better, UK Decarbonisation Strategy, Northern Powerhouse Strategy, Northern Powerhouse Rail, including

investment in the Sheffield to Hull and Leeds to Hull line, economic strategies, Goole Town Deal and the recent Freeport decision.

- 2.8 The spending review (November 2020) provided further commitment to the 'levelling up' agenda. This included £100 billion of capital expenditure to kickstart growth and support jobs. A key aspect is to strength the UK's place in the world and to maximise the UK's influence as a force for good and maintain the UK's position as a global leader in international development. The Government is investing in a recovery for all regions of the UK to build a stronger future as the country emerges from the Covid pandemic. The mantra being that investment drives economic recovery and support jobs and businesses across the UK.
- 2.9 Against this context of further investment in infrastructure and significant employment opportunities within Bassetlaw there is the evidence that employment growth should be increased within the Plan.
- 2.10 The HEDNA 2020 considers the housing and economic development needs. However, the HEDNA prepared in 2020 reflects an out dated position on Covid-19 and the economic recovery considering for example it will take four years for jobs and unemployment to recover to pre-pandemic levels. The HEDNA 2022 Addendum focusses on updating the employment supply position and does not update the position on economic growth.
- 2.11 The Government is committed to a rebalancing agenda whereby it is seeking to "level up" economic growth and overcome regional disparities in order to allow the North of England to realise its potential. The Industrial Strategy – Building a Britain Fit for the Future, 2017, which aims to create an economy that boost productivity and earning power throughout the UK. The Industrial Strategy establishes Grand Challenges to put the UK at the forefront of industry. The Grand Challenges, as updated January 2021, expands upon the Grand Challenges, and develops ambitious missions to tackle the challenges. The first 4 of the Grand Challenges are focused on Global trends which are set to transform the future. These includes Artificial Intelligence and data; ageing society; **clean growth**; future of mobility. The UK Government aims to lead the world in development, **manufacture and use of low carbon technology**.
- 2.12 Bassetlaw lies in a strategically important area of the country in-between the Northern Powerhouse and the East Midlands. It will therefore benefit from growth in Yorkshire and the Midlands and needs to reflect these overarching growth strategies.
- 2.13 The Northern Powerhouse forms part of the Government's Industrial Strategy and has an objective to achieve a sustained increase in productivity across the whole of the North of England. It seeks to drive the transformation of the northern economy equating to 4% increase in productivity, an increase in GVA of almost £100 billion and the creation of up to 850,000 new jobs by 2050, rebalancing the gap in performance relative to southern England. The Northern Powerhouse Strategy seeks to achieve this aim through improvements in connectivity; addressing the disparity in skills; ensuring that the north is an excellent place to start and grow a business; and promoting trade and investment across the north. The economic review of the Northern Powerhouse identified four prime capabilities where the north is highly competitive, including **advanced manufacturing, digital, energy** and health innovation. It also identified a number of enabling capabilities including higher education, **logistics** and financial and professional services, which is a notable alignment with the economic strategies for Bassetlaw.

- 2.14 Furthermore, Bassetlaw is on the edge of the Sheffield City Region which aims **to build** on innovation capacity and capabilities, securing the future of the next generation by nurturing the economy whilst protecting people and the environment, investing in urban centres, building transport infrastructure, investing in zero carbon, making homes and land available for families and businesses to locate and grow and making good jobs that create opportunities.
- 2.15 The SEP vision aims by 2040 to create 33,000 extra people in higher level jobs and an extra £7.6bn growth in Gross Value Added in the economy. The vision also sets out to grow wages and for people to live longer with healthier lifestyles and for a net zero carbon city region.
- 2.16 Bassetlaw District is covered by the D2N2 LEP, which includes Derby, Derbyshire, Nottingham and Nottinghamshire. The Strategic Economic Plan aims to increase the overall value of the economy to £70bn with £9bn being added as a result, prosperity will rise and employment rates will be high and stable. The overall aim being to reduce the gap in economic activity levels between places in D2N2.
- 2.17 Despite its preparation relatively recently in 2020, the HEDNA does not reflect the scale of ambition and neither does the HEDNA Addendum (2022). There has been a significant change in circumstances since its preparation, and whilst the HEDNA nods to the potential to some of these changes it is clear that the implications of which are not fully reflected in the overall recommendations and consequently within the Plan. Similarly, the HEDNA Addendum reviews supply and the linkage between jobs and homes within the Plan, but it does not update employment analysis based on the current market for employment land.
- 2.18 The Local Plan evidence does not reflect fully on the impacts of Covid-19. It has become clear that the Covid-19 pandemic has not affected all sectors and markets in the same way. Several industry reports show that market activity returned post the first lockdown and that the outlook for the industrial and logistics sector is positive.
- 2.19 The impact of Covid-19 and Brexit has not been restricted to logistics. The UK Industrial Strategy has stressed the importance of manufacturing to the UK economy. Although some areas of manufacturing were affected initially by Covid-19, there are sectors, such as health and medical supplies, which experienced significant growth.
- 2.20 The UK Research and Development Roadmap 2020, updated 2021 is clear that Research and Development is critical to economic and social recovery from the impacts of the Covid-19 Pandemic. Beyond Covid the Roadmap notes that the greatest challenge is to decarbonise economies and build resilience to the impact of climate change, habitat loss and biodiversity. This approach is reflected in the Government's plans to Build Back Better and prioritise Levelling Up.
- 2.21 It is therefore concerning that given this political and strategic aims from a national to a regional and local level that the HEDNA adopts a pessimistic view on the economy and economic growth, which then transcends through to lower growth than would have otherwise occurred. This approach can harm the economy.

- 2.22 As stated earlier, paragraph 5.4 states that unemployment will have increased through Covid-19. This statement was already out of date at the time of publication of the report with the claimant count in September 2020 being 3.9%, which is lower than the East Midlands and GB average.
- 2.23 Furthermore, vacancy rates are low in the area at circa 2.98% and there is only 0.34 years supply of employment land. This all points towards the need for further employment land.
- 2.24 The Local Plan will therefore need to substantially increase employment delivery and the choice and number of sites. This range and choice will ensure the right conditions for a competitive market and create the number of sites needed to achieve the employment requirement.
- 2.25 Network Space therefore considers that their extension land at Manton Wood Distribution Park (Appendix 1) be allocated in the Local Plan, which is even more pertinent given the inclusion of the largely developed Manton Wood Distribution Park within the Publication Version Second Addendum.

Question 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?

2.26 Network Space do not have any comments on this particular issue.

Question 3: What other spatial strategies and distributions of growth were considered during plan preparation, and why were they discounted? Where is the evidence for this? Were alternative approaches tested in the Sustainability Appraisal work?

2.27 Network Space do not have any comments on this particular issue.

Question 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?

2.28 Network Space do not have any comments on this particular issue.

Question 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?

2.29 Network Space do not have any comments on this particular issue.

Question 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?

- 2.30 Network Space suggests that their extension land at Manton Wood Distribution Park be allocated to address the identified shortfall in employment land (Appendix 1). This is even more pertinent now that the committed and largely developed Manton Wood scheme is included within the general employment allocations in Policy ST7. Network Space consider that the extension land to the east be included to address this shortfall and provide choice and flexibility in employment land.
- 2.31 Furthermore, there has been no assessment of the existing Manton Wood Distribution Park together with the extension land. The two sites are conjoined and would effectively be a single site.
- 2.32 Network Space welcome that the potential of the site for employment has been recognised within the Site Selection Methodology (Update May 2022). Network Space is concerned that conclusions, albeit qualified dependent on scheme detail, on heritage and ecology are made without recognising the adjacent permitted and largely developed Manton Wood Distribution Park and that the woodland is a managed plantation.
- 2.33 Recognition is made within the report that the comments are not based on a detailed scheme, however the comments should recognise locational characteristics and surrounding developments, including permitted and developed schemes.
- 2.34 Furthermore, as stated within Network Spaces' earlier representations considerable planting and trees would remain on site as part of the proposals. Any trees felled would be replaced and replanted either onsite or elsewhere and therefore there would be no loss of the managed woodland. Therefore, the proposed scheme will only use a portion of the managed commercial woodland and there will be a significant portion retained, which will leave a buffer to the north of the Old Coach Road and to the east towards the Lodge, which will preserve its amenity.
- 2.35 Network Space understand that biodiversity and ecology are important therefore it is recognised within the proposal that any removal of trees requires suitable compensation. Furthermore, the site has a long and considerable frontage onto the A57 and, as confirmed by Network Spaces' highways consultant, a suitable access can be provided and there are no constraints. The site is

owned by Network Space and is therefore available and can come forward immediately. The site would further reinforce the provision of employment in this location and the success of the adjacent Manton Wood Distribution Park.

2.36 Therefore, Network Space do not believe appropriate site assessments have been undertaken.

Question 7: Are the plans assumptions in relation to the amounts and timing of development to be delivered through neighbourhood plans and the Worksop Central Development Plan soundly based?

2.37 Network Space do not have any comments on this particular issue.

Question 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?

2.38 Network Space consider that inadequate provision of employment land has been made within the Bassetlaw Local Plan and therefore it is not in accordance with national policy. Therefore, to resolve this further employment land needs to be identified, including Network Space's land at Manton Wood Distribution Park.

Question 9: Do the vision and objectives of the plan adequately address matters of climate change and air quality?

2.39 Network Space do not have any comments on this particular issue.

Question 10: Are the Council's proposed modifications to the policies necessary for soundness?

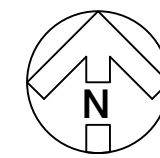
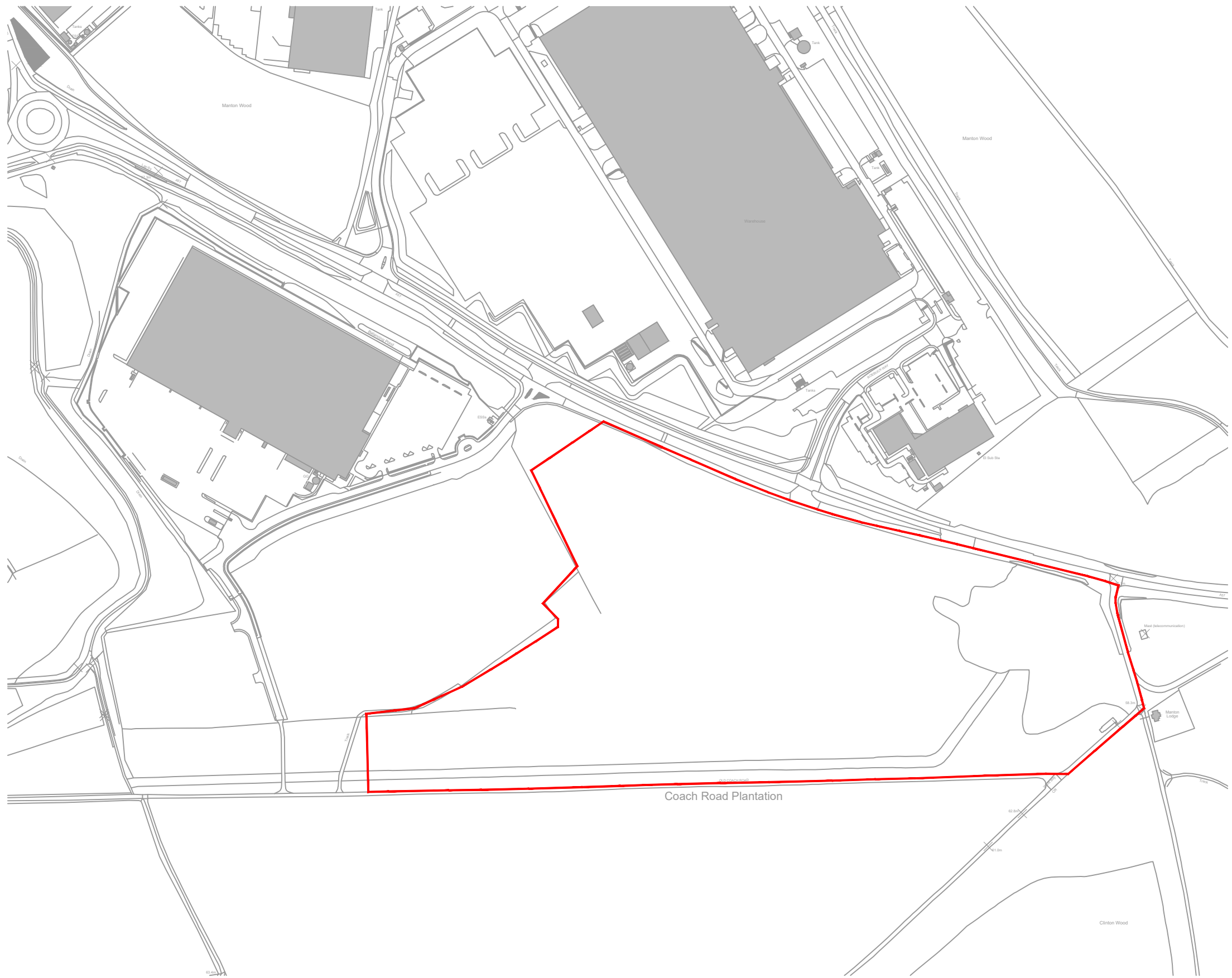
2.40 Network Space do not have any comments on this particular issue.

Proposed Change

2.41 To overcome the soundness matters Network Space proposes the following changes:-

- Increase the employment allocations to reflect the economic need and the economic growth aspirations for the District and region.
- Identify further sites to increase flexibility in the Plan.
- Allocate Network Space' extension land at Manton Wood Distribution Park.

Appendix 1: Manton Wood



Revision | **B** Drawn | **EH** Reviewed | **AR** Date | **17-02-2022**

planners | urbanists | architects



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ISSUED

Client Name
Network Space

Project Title
Manton Wood Extension

Drawing Title
Site Location Plan

| | | | |
|-----------------------|--------------------------|-----------------------------|---------------------------|
| Drawn By EH | Reviewed By AR | Scale @ A3 1:5000 | Date 11/02/2022 |
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| Drawing No. P4490 SPA XX ZZ M2 A 01 001 | Revision B |
|---|----------------------|

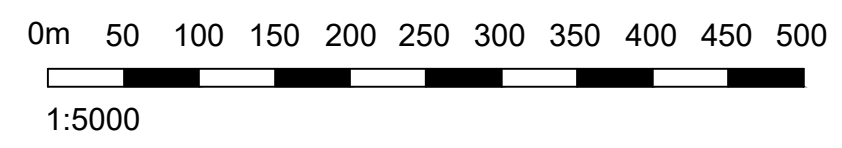
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| PROJECT NO. | COMPANY | ZONE | LEVEL | TYPE | FILE | NUMBER |
|-------------|---------|------|-------|------|------|--------|

File Path

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Site Location Plan





Option One

Client Name: Network Space
Project No: P4490
Title: Manton Wood
Distribution Park
Drawn By: EH
Checked By: AR

Scale: Not to Scale @ A2
Discipline: LP
Date: 16/02/2022
Drg No: P4490-SPA-IL-1000-002
Revision: D



Option Two

Client Name: Network Space
Project No: P4490
Title: Manton Wood
Distribution Park
Drawn By: EH
Checked By: AR

Scale: Not to Scale @ A2
Discipline: LP
Date: 16/02/2022
Drg No: P4490-SPA-IL-1000-003
Revision: C