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Dear Sirs

Re: Bassetlaw Local Plan Examination. November 2022

Thank you for the opportunity to comment on the Publication Version Composite of the Bassetlaw Local Plan. Comments are made on sections 3.1 and 3.3, with an accompanying appendix – a previously submitted review of the second addendum by Gentian, in relation to an employment site north of Serlby Road, Harworth.

I would also like to register to speak at the hearing regarding the employment land allocations.

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?

3.1 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?

I have reviewed the updated documents published on the Council's website and I consider that the Provision of Land for Employment Development is inconsistent with the approach required by the NPPF and is therefore **unsound**.

The Emerging Local Plan doesn't consider the number of allocations which are under construction and to be completed within the early stages of the local plan cycle and the impact that this may have on supply, particularly towards the later years of the Local Plan Period.

The updated Housing and Economic Needs Assessment (April 2022) notes the updated land employment land need is 196.7ha. The updated supply position is 189.4ha. This leaves a 7.3ha deficit of general and larger unit employment land before the Apleyhead Junction Strategic site is added.

Policy ST7: Provision of Land for Employment Development lists a number of sites which have the benefit of planning permission. This notes that there is the potential residual development land of 183.2ha. Within this, the Snape Lane (42ha) and Symmetry Park (14.4ha) are under construction. Therefore 56.4ha of land could well be completed/partially complete by the time the Local Plan is adopted. Additionally, the Whole of the Manton Wood Extension development is understood to have been leased to DHL, thus removing another 10.7ha (phases 2 and 3) of land from providing additional general employment space within the plan period.



There is currently 56.4ha of consented employment use under construction at Snape Lane and Symmetry Park. (B&Q have agreed a 430,000sqft pre-let at Symmetry Park. <https://tritaxsymmetry.com/latest-news/bq-agrees-430000-sq-ft-pre-let-at-symmetry-park-doncaster/>) The additional employment site with planning permission at Manton Wood (10.7ha) has also been pre-let to DHL on a 20year lease who have detailed permission for Phase 3 and a current application in with planning for Phase 2.

Therefore, when considered holistically and strategically from when the Local Plan has been adopted (say middle/end of 2023) there will be a total of circa 65 ha of employment space nearing completion/pre-let within year 1 of Adoption, which could impact supply further down the line. This has not been considered within the policy allocations and would suggest that given its strategic location there is more demand than supply. The significant pre-let's would suggest this.

Notwithstanding the above, paragraph 6.1.25 of the publication version composite and the supporting evidence suggests that the recent past rate of take up/delivery under represents future needs and that Bassetlaw could contribute to meeting this future economic sub regional/ regional need for Logistics, which would suggest that the area is in demand for this particular sector.

Given the local plan evidence suggests a completion trend, there is potential for a further deficit of employment land coming forward to meet that as outlined within the Economic Development Needs Assessment, particularly towards the end of the plan period, which doesn't seem to have been addressed within the Policy.

Approach to General Employment Sites

The reliance of complementary policy mechanisms for the delivery of the general business growth such as the renewal of existing employment sites (ST10) and business growth in the rural area (ST11) may not be enough to provide adequate business space across the Plan Period, particularly as the local plan does not allocate enough employment space to meet demand before the Strategic Allocation Apleyhead Junction is considered.

Occupiers are constantly seeking for premises which are more sustainable. Whilst retrofitting the existing stock could be undertaken, there may be an impact in terms of replacement supply etc. For example, in some instances the existing stock may require complete redevelopment. There is nothing in the policy to suggest that there will be a net increase of employment floorspace within this policy to meet the unmet demand.

No new allocations for General and Larger Unit Employment sites have been included within the emerging local plan other than those which already have extant planning permission and in some instances under construction. The Emerging Local Plan therefore fails to meet point b) of Para 35 as it does not provide an appropriate economic growth strategy for the plan period. There have been no alternative sites put forward for consideration to both meet the identified unmet demand(7.3ha), or has it considered the DHL lease on Manton Wood which nullifies that site as general employment site, or that there will be circa 56ha of sites coming forward at the early stages of the plan period.



The Local Plan therefore also fails to meet criteria c) as without modifications the employment would not be effective to meeting the identified demand for employment floorspace within the plan period given the reasons set out above.

Given the above, the local plan is considered to be unsound and as such is not consistent with National Policy and fails criteria d) of para 35.

The Employment Strategy needs to be reconsidered to ensure that it meets the districts objectively assessed needs without the reliance of the strategic employment site to make up the numbers, given this is a regionally strategic allocation.

Employment sites which can deliver a range of sized units should be encouraged to achieve the D2N2 LEP growth sectors such as construction, renewable energies, engineering and general employment floorspace.

There therefore needs to be new allocations within Policy ST7: Provision of Land for Employment Development which promotes new employment land. This will therefore allow for additional floorspace to come forward which can cover the deficit identified above as well as being able to service a range of uses and users on the site.

The land to the North of Serlby Road (LAA580) was assessed within the Updated Site Selection Methodology and was assessed as having the potential for logistics. It was discounted as a reasonable alternative.

Since this submission a capacity study has been undertaken which supports this submission document. This shows that the site is capable of delivering circa 30,000sqm of flexible employment floorspace. The layout etc and final would be subject to a full site survey and appropriate due diligence being carried out, but it is considered that some form of development would be acceptable on the site.

The site has been assessed within the updated sustainability appraisal. It is considered that any development on the site would be required to provide a biodiversity net gain by legislation within the development and as such it is considered that SA Objective 1: Biodiversity and geodiversity could at least achieve 'minor positive effective likely' score as a minimum.

It is also likely that any development on the site would benefit from the use of at surface SUDS, which could also be used as part of a wider blue network biodiversity gain on the site. It is envisaged that there is potential to link to the adjacent pond and as such the area where block L is located may become a balancing pond subject to site surveys etc. We as developers have used this approach on other scores. Therefore, SA Objective 8: Water could have a more positive score.

The initial highways comments have been noted and would form part of any planning application process and we would be able to provide safe access in and out of the site. Road widening could be undertaken at the site by developing into the verge of the road. There is also potential for the installation of a footway which will connect to the existing footpath for the A1 flyover footway. IT is considered that there is potential for a reduction of speed along Serlby Road, which would also improve highways safety. These are all matters which can be dealt with during any planning application process. Whilst there may be an element of logistics



which might come forward, the proposal would seek to provide smaller, flexible units which would likely be delivered over various phases throughout the Local Plan period.

Overall, it is considered that the employment strategy as proposed does not meet the tests of Soundness as outlined within Paragraph 35 of the NPPF. The strategy therefore requires modifications for it to be considered sound. The additional of new employment allocations on sites without planning permission is considered to be a practical way forward in order to progress the Local Plan being adopted.

As outlined above and attached (Appendix 1), the site located north of Serlby Road (LAA580) provides a real opportunity to provide the required level of additional employment floorspace over the plan period. The site is available, deliverable and achievable within the local plan period.

In terms of policy wording we consider the following as being appropriate:

Policy [XYZ]

Land to North of Serlby Road

The land off Serlby Road as identified within the proposals map will be brought forward by 2030 to meet the additional need for general employment floorspace within this plan period. The proposal will consist of a mix of employment generating uses within Classes E(g), B2, B8 and sui generis uses (i.e., builders merchants etc).

The site will deliver approximately 6 hectares of general employment floorspace within the uses identified above. Proposals should:

- a) achieve good quality design through the use of high-quality materials that support the positive development of the site
- b) be supported by an appropriate landscaping buffer to the west which will support biodiversity improvements and mitigate any visual impact from the development.
- c) Be constructed to a minimum BREEAM very good standard
- d) Incorporate SUDs principles throughout the surface water drainage scheme
- e) secure safe access and egress off Serlby Road
- f) provide appropriate servicing and parking provision for each development parcel
- g) Provide for a significant number of new permanent jobs including skilled employment



3.3 In relation to strategic employment needs:

a) Is the allocation of 119ha at Apleyhead, in addition to land identified for "General and Larger Unit Employment Sites" justified and consistent with national policy?

b) What factors led to its allocation? Is it based on up-to-date evidence?

c) Has the allocation had appropriate regard to the potential wider strategic impact of the development?

Whilst it is noted that the Apleyhead Junction Strategic Site will provide an additional 118.7ha of employment floor space, this strategic site is being put forward as a site of regional



importance and will service the logistic sector (B8 use only). It is therefore considered that this strategic site should be included within its own entity as it does not conform with the General and larger Unit employment sites.

It is therefore considered that the total amount of employment land proposed with the Emerging Local Plan falls below the required amount as set out through the evidence gathered for the plan period as outlined above. The proposal therefore does not comply with the requirements of the NPPF Para 35(a) which requires Local Plans to be positively prepared and as a minimum seek to meet the areas objectively assessed needs.

Yours Sincerely

Leanne Pogson MRTPI

Director