

**WRITTEN STATEMENT IN RESPECT OF THE BASSETLAW LOCAL PLAN 2020 – 2038 EXAMINATION  
MATTER 3: EMPLOYMENT LAND**

**6. INTRODUCTION**

- 6.1. This Written Statement is made on behalf of our clients, Welbeck Estates Company Limited (Welbeck), in response to the Inspector's Matters, Issues and Questions of the 7 October 2022 for the examination hearings of the Bassetlaw Local Plan 2038.

**7. MATTER 3 – EMPLOYMENT LAND**

**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?**

**Q. 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?**

- 7.1. Yes. The NPPF requires a healthy supply of employment land to meet identified forecasts in the Local Plan and this is exactly how Bassetlaw District Council has completed its plan preparation process. P&DG do not have any further comments.

**Q.3.2 Is the restriction of B2, B8 and Class E(g) justified for new employment allocations?**

- 7.2. At the heart of the NPPF is its economic objective, which seeks to *'help build a strong, responsive and competitive economy by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth'* To achieve this objective, the NPPF recognises that planning policies should *'be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices and enable a rapid response to changes in economic circumstances'* (Paragraph 82).
- 7.3. It is noted that the intention of such policy restriction is to protect the identified employment sites from non-employment uses, which could impact on their viability. However, it is our view that all employment allocations identified within the plan should be as flexible as possible to accommodate other uses where appropriate. This will ensure that the allocations are not unduly restricted in delivering otherwise sustainable development and can effectively respond to any change in economic circumstances.
- 7.4. Our specific comments in relation to the Welbeck Colliery site, which the Local Plan recognises as an employment site with planning permission (ref: EM004) are made in response to Q3.7 below.

**Q.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?

7.5. P&DG do not have comments to raise with respect to the new strategic employment allocation at Apleyhead.

**Q.3.4 Are the requirements of policies ST7 and Policy 9 clear, and would the criteria identified to assess proposals on these sites be likely to be effective? In particular:**

- a) Is the requirement of 3(e) necessary and what does it seek to achieve?
- b) Is there sufficient evidence to demonstrate that the site can be implemented and that all necessary infrastructure and mitigation measures required to support it are achievable and can be delivered?
- c) What assumptions have been made in relation to the timescale for delivery and are these justified?

7.6. P&DG do not have any comments to make.

**Q.3.5 In relation to policy ST10 is the policy based on up-to-date evidence and is the policy consistent with national policy?**

7.7. P&DG do not wish to make any comments in relation to Policy ST10.

**Q.3.6 In relation to policies ST11 and ST12, are the policies justified by appropriate available evidence, having regard to national guidance, and local context? Do the policies provide clear direction as to how a decision maker should react to a development proposal? In relation to camping, caravanning and chalets, do the proposals pay appropriate regard to the biodiversity impacts of such proposals?**

7.8. P&DG do not wish to make any comments in relation to ST11 and ST12.

**Q.3.7 Are there any omissions in the policies and are they sufficiently flexible?**

7.9. As noted above, the NPPF recognises that planning policies should ‘*be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices and enable a rapid response to changes in economic circumstances*’ (Paragraph 82). However, it is our view that as currently presented the employment policies within the Local Plan are not sufficiently flexible, and therefore, not in accordance with the NPPF.

- 7.10. Indeed, Policy ST7: Provision of Land for Employment Development of the Local Plan states that: *'Employment land will be developed in this plan period for E(g) (uses which can be carried out in a residential area without detriment to its amenity), B2 (Industrial) and B8 (Storage and Distribution) uses to meet local employment needs.'* Therefore, restricting the development of these sites to certain uses.
- 7.11. Whilst it is acknowledged that the purpose of this is to protect the supply of employment land with the plan period, there is no clear evidence that justifies the approach taken by the Council. Our key concern is that Policy ST7, as currently drafted, could unnecessarily constrain the potential for employment sites, such as Welbeck Colliery, to come forward for development in the plan period.
- 7.12. The Welbeck Colliery site is currently identified as an existing employment site with planning permission (3ha of gross employment land) in the Local Plan under Policy ST7 (ref: EM004). The site is also recognised for residential development and is expected to deliver 65 dwellings within the plan period, as set out in the Council's housing trajectory.
- 7.13. Indeed, the site has been subject of a hybrid planning application (ref: 15/01037/FUL) which granted planning permission for the mixed-used development in 2016. The planning permission includes the following elements:
- 1). Full permission for alterations to existing site access points: extensions and alterations to existing internal spine roads; car parking for use in connection with the previously approved country park; creation of development platforms.
  - 2). Change of use of part of the site for open storage use (Use Class B8) and associated infrastructure.
  - 3). Outline planning permission for offices (B1a), employment uses (B1b/c, B2 and B8), residential (C3), and ancillary retail and food/drink uses (A1 & A3) with associated infrastructure.
- 7.14. The extant planning permission is testament to the site's capability of accommodating a wide range of uses, which was deemed appropriate by statutory consultees and the Council in the determination of the application. The site should, therefore, be explicitly recognised as being a mixed-use development site within the Local Plan, rather than purely an employment site.
- 7.15. It should also be noted that the Welbeck Colliery site has significant potential for further expansion to meet the development needs of the District. The site is a key brownfield regeneration opportunity that will otherwise remain redundant if it is not developed. Moreover, the NPF gives great weight to the value of using suitable brownfield land within settlements for homes and other identified needs (Paragraph 120).

- 7.16. The prominence of the Welbeck Colliery as a regeneration site is also reflected in the recently adopted Cuckney, Norton, Holbeck & Welbeck Neighbourhood Plan (CNHW) (September 2022) recognises the key role that the site will have in the creation of local jobs and investment for the local area. The CNHW also recognises the support from local communities in seeing the redevelopment of the former colliery site for employment, housing, and other uses. As such, the employment policies in the CNHW do not specifically relate to the Welbeck Colliery nor do intend to constrain the redevelopment proposals.
- 7.17. Spatially, the site also shares a positive relationship to Meden Vale (formerly Welbeck Colliery Village). The site can, therefore, play an important role in supporting the growth and long-term sustainable of the village and help to address its future development needs. Whilst Meden Vale is located outside of the Council authority boundary in Mansfield, at present there is no evidence of any cross-boundary implications or reservations that would prevent the expansion of the village and of the Welbeck Colliery site.
- 7.18. At present, there are no specific development strategies for the land. However, it is within the interest of Welbeck to ensure that the mixed-use potential of the site is retained, and not unduly restrict the site to specific employment uses. The employment policies in the Local Plan should, therefore, be as flexible as possible to allow sites, such as Welbeck Colliery to come forward for development with restrictions on uses. The site has a developer on board for implementation of residential use on this site. An indication of the spatial relationship this has to Meden Vale and its amenities is included with drawing 18.009/2.
- 7.19. Ultimately, Welbeck have a keen interest in ensuring that the site is regenerated in the best possible way to ensure that it leaves a lasting legacy in the area for the benefit of future communities to enjoy. It should, therefore, be recognised that the site has significant potential and capacity to accommodate additional growth to meet the development needs of the Borough.

**Q.3.8 Are the Council's proposed modifications to these policies and the supporting text necessary for soundness?**

- 7.20. P&DG do not wish to make any proposed modifications to these policies and the supporting text for necessary for soundness.