

Bassetlaw Local Plan Examination in Public

Matter 3, Issue 3

Statement on behalf of Hallam Land Management
Ltd and IBA Planning

INTRODUCTORY STATEMENT

- i. Hearing Statements are submitted by Christopher Waumsley DipTP MRTPI of Inovo Consulting supported by David Lock Associates Ltd on behalf of Hallam Land Management and IBA Planning (hereinafter referred to as HLM/IBA), promoter of land at **Peaks Hill Farm, Worksop** for which a draft allocation is made under Policy 16:HS1 of the *Bassetlaw Local Plan Submission Version July2022*).
- ii. Hallam and IBA control and are promoters of land at Peaks Hill Farm Worksop which is proposed as a strategic mixed use allocation in the draft plan. The intention is to provide a sustainable urban extension to the north of Worksop incorporating strategic green and grey infrastructure, most notably a new East West link road to serve the town from the A60 (Carlton Road West) to the A6045 (Blyth Road).
- iii. Hallam and IBA have been positively engaged with the Policy Team, and more latterly, Development Management Team at Bassetlaw since 2019 and throughout the evolution of the local plan.
- iv. For context a summary of activity and engagement undertaken to date in respect of the proposed allocation site is set out below:
 - a) An initial development concept for a sustainable urban extension at Peaks Hill Farm was prepared in July 2020, worked up in conjunction with the planning authority and proposing a broad vision and overall objectives for development. This concept plan informed the preparation of technical survey and assessment and was subject to public and stakeholder engagement alongside the November 2020 Local Plan consultation.
 - b) Responses to that consultation exercise and engagement with key officers, stakeholders and consultees in the period since has resulted in the evolution of the concept plan into a draft Development Framework which was subject to a second round of stakeholder engagement in Feb 2022 and is currently the subject of pre-application discussions. The Development Framework is intended to govern the submission of an outline planning application, design coding and detailed applications for infrastructure and development in accordance with local plan policy objectives set out in Policies ST56 and ST58 and referenced in paras 12.3.4-5 of the draft Plan.
 - c) Alongside this work the promoter's consultant team have carried out a wide range of assessments and studies to allow the identification of the technical considerations pertinent to the site's development. This technical information has informed the preparation of a draft outline planning application for the site's development. As part of that process an EIA screening opinion was submitted in February 2022 -, - a subsequent EIA scoping opinion - in March 2022 and a formal pre application submission was made in August 2022-

- d) Taken together, the EIA outputs and the feedback from stakeholder and officer consultation has allowed mitigation to be designed into the masterplan; the likely infrastructure requirements arising from the development to be confirmed; and has provided a greater degree of detail - and therefore certainty - over the nature and quantity of development and infrastructure to be delivered on site.
- v. Hallam and IBA are appearing at the Examination in support of BDC's commitment to an urban extension north of Worksop to meet the needs of the plan area within the plan period to 2038. Those needs have been assessed in the evidence base and are articulated in the plan (in particular in Policy 16: HS1). The allocation of an urban extension at Worksop represents a spatial growth solution which is aligned with the overarching Vision and Objectives of the Plan - and will ensure outcomes which ensure effective delivery of Plan objectives.
- vi. In response to the Inspectors' *Part 1 Matter, Issues and Questions (MIQ)* issued on xxx October 2022, HLM/IBA wish to make a number of points to supplement the representations made by Inovo at the Regulation 18 state consultation -and the Regulation 19 stage consultation - of the *Bassetlaw Local Plan (BLP)*.
- vii. Our Hearing Statements provide clarification of our clients' position to assist the Inspectors in consideration of their questions posed to the Council in the *Matters, Issues and Questions*. As part of the review of the evidence base published since the submission of the Plan, technical evidence and input to these Statements has been provided by:
- FPCR (master planning, arboriculture and ecology);
 - ADC Infrastructure (highway design); and
 - Rodgers Leask Ltd (drainage)

MATTER 3 – EMPLOYMENT LAND

(Policies ST7, ST9, 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?

- 1.1 We support the ambition of the Plan in supporting the District's growth agenda through securing *"equivalent growth in the area's employment base"* (para 6.1.29) and the recognition that Policy ST7 *"builds on the Council Plan aspirations, the evidence and market interest, and capitalises on the District's locational advantage, by promoting locations able to provide a continuous and diverse supply of employment land to meet the needs of existing and future economic development within proximity to the Main Towns and local labour supply"*.
- 1.2 We also support the thrust of Policy ST7 in relation to the identification of 'General and Larger Unit Employment Sites' for accommodating sustainable economic growth to *"support job growth and upskilling of residents"*.
- 1.3 We have two minor comments to make in respect of Land at Carlton Forest which is identified under Policy ST7 as one of the allocated employment sites with planning permission (ref EM005 on the table on page 58 of the submission Plan).
- 1.4 First, the table states that of the 10.6 ha of land which is subject to an extant planning permission, 5.0 ha is the 'residual available employment land at 31 March 2022' expected to come forward within the plan period. As such we suggest that for clarity an amendment to the table on page 58 is added by way of a footnote, as follows:

General and Larger Unit Employment Sites

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 at the following General and Larger Unit Employment Sites identified on the Policies Map:

Reference	Site Name	Site area (Ha)	Gross Available Employment Land (Ha)	Residual Available Employment Land (Ha) at 31 March 2022
Sites with Planning Permission				
EM001	Shireoaks Common	26.0	7.5	7.5
EM002	Symmetry Park	21.95	14.4	14.4
EM003	Explore Steetley	46.5	16.0	16.0
EM004	Welbeck Colliery	29.6	3.0	3.0
EM005	Carlton Forest	10.6	10.6	5.0 10.6 ¹

¹ **NB. Consented site EM005 forms part of a wider mixed use allocation and as such employment development on this site will be brought forward as part of the Policy 16 HS1 Peaks Hill Farm allocation**

- 1.5 Second, detailed technical and design work as part of the EIA and pre-application activity – most notably in respect of Green Infrastructure, the detailed design of the distributor road - and surface water drainage which generate- the need for a larger land take - (over 4 ha) than that assumed on the Policies Map and in earlier local plan site capacity assumptions. This work suggests that if the employment requirements of the allocation are to be met together with the full site of policy-compliant supporting facilities and on-site green and grey infrastructure, it is unlikely the site can deliver the full 10.6ha of dedicated employment land on site (albeit that the policy anticipates that only 5 ha will come forward by 2038 in any event).
- 1.6 This does not present an issue in terms of job generation– the policy objective is to secure 1,000 additional jobs on site¹ delivered alongside new homes –, as the mix of dedicated and mixed use employment land proposed by the promoters to be accommodated on site can easily deliver the 1,000 additional jobs sought from the site (Table 1 in our Matter 6 Statement sets out the expected job generation capacity arising from the employment-generating uses proposed on site). Further, the employment offer which would result from this approach offers a wider choice to prospective occupiers/employers than would 100% of the employment land requirement being provided in a lower density dedicated employment site format.
- 1.7 For this reason, we have suggested a Minor Modification to the wording of paragraphs 7.2.1 and clause 1 of Policy 16 HS 1 in respect of the quantum of employment land proposed: a reduction from approx. 10.6 ha to approx. 6.5 ha. The precise extent and form of employment provision on site to ensure the delivery of the 1,000 jobs can then be worked through as part of the pre-

¹ As referenced in para 7.2.6 and footnote 10 of the submission Plan.

application engagement on the whole urban extension, taking into account the need to also meet other criteria as listed in the policy.

Q3.1 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?

1.8 It is anticipated that this question will be addressed by the Planning Authority.

Q3.2 Is the restriction to B2, B8 and Class E (g) justified for new employment allocations?

1.9 It is anticipated that this question will be addressed by the Planning Authority. However, we do not have any particular issue with the employment uses as currently defined in Policy ST7.

Q3.3 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?**

1.10 We have no specific response on this matter.

Q3.4 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?**

1.11 We have no specific response on this matter.

Q3.5 In relation to policy ST10 is the policy based on up-to-date evidence and is the policy consistent with national policy?

1.12 It is anticipated that this question will be addressed by the Planning Authority.

Q3.6 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?

1.13 It is anticipated that this question will be addressed by the Planning Authority.

Q3.7 Are there any omissions in the policies and are they sufficiently flexible?

1.14 We have no specific response on this matter.

Q3.8 Are the Council's proposed modifications to these policies and the supporting text necessary for soundness?

1.15 We have made reference in para 1.5 to 1.7 above to our suggested minor modification to Policy ST7 and Policy 16: HS1 to ensure than (a) an appropriate degree of clarity is in place around the overlap between Sites EM005 and HS1 in terms of allocation, and (b) to give an appropriate degree of flex for subsequent planning application(s) to demonstrate how the required jobs generation can be achieved on site through a mixed use scheme without impacting other policy requirements.

1.16 If these minor modifications are accepted, then we are of the view that the policy and supporting text can be considered effective and thus, found sound.