

Meeting note under the Duty to Co-operate with the Property Market Area Authorities in relation to Apleyhead proposed employment split.

A virtual meeting took place on Tuesday 20th December. The following officers from all 22 Property Market Area (PMA) Authorities were in attendance:

- [REDACTED] - Amber Valley Borough Council
- [REDACTED] – Ashfield Borough Council (NO)
- [REDACTED] – Barnsley Metropolitan Borough Council
- [REDACTED] – Bassetlaw Borough Council (RR)
- [REDACTED] – Bassetlaw District Council (KJ)
- [REDACTED] – Bolsover District Council
- [REDACTED] – Broxtowe Borough Council
- [REDACTED] - Central Lincolnshire (Representing North Kesteven District Council and West Lindsey District Council)
- [REDACTED] – Doncaster Metropolitan Borough Council
- [REDACTED] – Gedling Borough Council
- [REDACTED] – Mansfield District Council
- [REDACTED] – Melton Borough Council
- [REDACTED] – Newark and Sherwood District Council (MN)
- [REDACTED] – North East Derbyshire District Council
- [REDACTED] – North Kesteven District Council (MW)
- [REDACTED] – Nottinghamshire County Council (SP)
- [REDACTED] – Rotherham Metropolitan Borough Council
- [REDACTED] – Rotherham Metropolitan Borough Council
- [REDACTED] – Rushcliffe Borough Council
- [REDACTED] – Sheffield City Council (RHo)
- [REDACTED] – South Kesteven District Council
- [REDACTED] – South Kesteven District Council
- [REDACTED] – West Lindsey District Council

Authorities not present:

- Chesterfield Borough Council – phone call took place on 05.01.23 ([REDACTED])
- Erewash Borough Council – email discussion taken place on 20.12.22 ([REDACTED])
- Nottingham City Council – teams meeting taken place on 21.12.22 ([REDACTED])

Notes from the meeting:

- RR provided an update on the Examination of the Bassetlaw Local Plan - noting that there is one further session to cover Transport, Infrastructure and Apleyhead.
- RR explained why the meeting had been called – to obtain a formal view on the proposed split use of Apleyhead strategic employment allocation.

- RR confirmed the submitted position of Apleyhead – 118ha of land at the junction of the A1 / A57 (East of Worksop) for use class B8 – to meet the needs of large-scale sub regional and regional logistics only, within the plan period.
- RR cross referenced to policies ST7 and Policy 9 of the Local Plan and also referred to the agreed Statement of Common Ground (SOCG) [BDC-17].
- KJ provided an overview of day 2 of the hearings where Matter 3 was discussed on 30th November. Caddick Developments (the Apleyhead site promoters) presented a proposed split of B8 / B2 (80% / 20%) for the site, and confirmed that the estimated floorspace is now 440,000sqm.
- RR confirmed that views are now sought by Bassetlaw District Council on or before Friday 6th January, on the following questions, which will be presented to the Inspector ahead of the hearing session on Apleyhead:
 - Would your authority support the 80/20 split?
 - If not what split could be supported?
- It was agreed and understood by all that given the time constraints involved, the views provided by the PMA authorities would be officer views only and will not have been signed off formally / politically.

Questions raised during the meeting:

- MW questioned the type of B2 offer (general industrial or other B2). KJ confirmed that the details other than manufacturing has not been provided by Caddick Developments.
- MN sought clarification as to whether Apleyhead would be deliverable without this split. KJ confirmed that we have not received any information indicating that this is the case from Caddick Developments.
- RHo confirmed that Sheffield were imminently about to consult on a regulation 19 Local Plan. As part of their logistics assessment they have been asked to review the wider PMA. Sheffield support Apleyhead as a logistics site. If B2 is required from a viability point of view, then evidence would be required to support.
- SP queried the trip generation and how this would be controlled. KJ confirmed this would be discussed at the hearing session in January under Matter 13.
- NO queried if Bassetlaw had other B2 sites available. KJ confirmed that there were alternative sites where general B2 could be accommodated elsewhere, but that Apleyhead is a strategic allocation, so we are only looking at strategic needs for this allocation.

Summary of responses received:

Responses were received from all 21 PMA authorities. It should be noted that Bassetlaw District Council have not provided a view as part of this DtC meeting note.

- **Support for proposed split** – Amber Valley, North East Derbyshire, Bolsover and Melton (Total 4 = 19%)
- **Support but B2 should be ancillary / strategic** – Chesterfield, Nottinghamshire County Council, South Kesteven (Total 3 = 14%)

- **Potentially Support but justification / clarification / evidence required** – Barnsley, Doncaster, Mansfield, Sheffield (Total 4 = 19%)
- **Proposed split not supported** – Ashfield, Broxtowe, Erewash, Gedling, Nottingham City, Rushcliffe, Central Lincolnshire (North Kesteven and West Lindsey), Newark and Sherwood, Rotherham (Total 10 = 48%)
- Other points to note: Nottinghamshire County Council have suggest a limit within policy ST7 in relation to floor space and use class. Mansfield raised concerns about whether the identified regional / sub-regional need would still be met if only 80% of the site is used. Rotherham are still opposed to the allocation as a whole in relation to transport.
- Each response is set out in full in Appendix 1 of this note.

Appendix 1: Individual Authority Responses

Amber Valley:

Further to your email and our meeting on 20 December 2022, I can now advise on behalf of Amber Valley Borough Council that the proposed 80/20 split can be supported by the Borough Council. I have no other comments to make in respect of this issue.

Ashfield District Council, Broxtowe Borough Council, Erewash Borough Council, Gedling Borough Council, Nottingham City Council and Rushcliffe Borough Council.

I write on behalf the local planning authorities (LPAs) of Ashfield District Council, Broxtowe Borough Council, Erewash Borough Council, Gedling Borough Council, Nottingham City Council and Rushcliffe Borough Council. Together with Derbyshire and Nottinghamshire County Councils, they constitute the Greater Nottingham Planning Partnership (GNPP). All the LPAs are currently progressing local plans.

You have requested that Councils within the Property Market Area (PMA) provide a formal view on the new proposed employment split at Apleyhead (which is proposed for allocation as a strategic employment B8 site to meet the needs for large scale sub-regional and regional logistics only). The points below constitute the LPAs formal view.

1. The Apleyhead site has been allocated specifically in response to the significant demonstrable demand for B8 uses in the PMA, as evidenced through various studies, including the Nottinghamshire Core & Outer HMA Logistics Study - August 2022. (<https://www.gnplan.org.uk/media/3375066/nottinghamshire-logistics-study-august-2022.pdf>)
2. There are sufficient sites elsewhere within the Bassetlaw area to meet its evidenced need for B2 uses. The use of this site (which is well located to serve the needs of the logistics sector across the PMA) for non logistics development would represent an inefficient use of land.
3. No evidence has been presented as to why B2 development is required in order to deliver B8 development on the remainder of the site. There is no reason to believe that a wholly B8 development would not be deliverable.
4. The Nottinghamshire Core & Outer HMA Logistics Study refers to this site, and assumes that it will be delivered for its intended purpose when arriving at conclusions and recommendations for the Nottingham Core and Nottingham Outer Housing Market Areas. The loss of part of the site to other uses would increase the demand for further provision of land for logistics purposes elsewhere in the PMA, where large parts of Derbyshire and Nottinghamshire are constrained by Green Belt.
5. Given the size of the proposed Apleyhead allocation, the use of 20% of the site for other uses represents a significant area of land. A mix of uses

on this site (beyond ancillary development required to make the development sustainable) is not supported.

Please ensure these views are communicated to the Inspector. Should you have any queries regarding this matter, please contact me using the details below.

Barnsley:

I am writing to confirm that our preference is for the site to remain 100% B8. We would be willing to see a reduction to 80% B8 20% B2, provided this is supported by robust evidence and can be proven it will assist with deliverability and viability.

We would advise caution against allowing employment uses that fall into the very broad Use Class E, to guard against employment land supply being eroded through a permitted development change to another use within that class.

I trust this letter is sufficient. Please let me know if you require any further, more detailed response.

Bolsover:

From consideration of this matter, it is noted that the proposed 80/20 B8/B2 use class percentage split on the Apleyhead Junction Strategic Employment site allocation would preserve the significant warehouse and distribution provision whilst providing some flexibility in the market for ancillary or related types of general industry employment uses on the site.

In light of this revision, I can confirm that in light of the signed SoCGs Bolsover District Council would not object to this proposed modification.

Central Lincolnshire (North Kesteven and West Lindsey):

The Central Lincolnshire Joint Strategic Planning Committee signed the Statement of Common Ground [SCG-017]. In addition, individually West Lindsey District Council and North Kesteven District Council signed the Bassetlaw A1 Corridor Logistics Assessment Property Market Area Authorities Statement of Common Ground [BDC-17]. The signing of each Statement of Common Ground (SoCG) was based on the policy set out in the Regulation 19 Submission Version of the Bassetlaw Local Plan. The proposal in the submission plan was for Apleyhead to be a regional logistic site catering for large-scale B8 development and was underpinned by a substantial evidence base examining a primary market area based upon the A1 Corridor.

The Central Lincolnshire Authorities are mindful of the evidence base and the market attractiveness of the strategic road network in respect of the A1 corridor meaning that there are specific and evidenced material considerations that support an allocation of Apleyhead for B8 large-scale logistics purposes. The significant locational characteristics and advantages of Apleyhead for B8 large-scale logistics are not comparable with sites within Central Lincolnshire and therefore the proposal to allocate the site for such a development would not compete with nor undermine the economic development strategy of the Central Lincolnshire Local Plan as

adopted and its review which is currently at examination. Put simply, Central Lincolnshire has no comparable regional scale logistics site opportunity and therefore there was no reason to oppose Apleyhead such that entering into each of the SoCGs was reasonable.

The Central Lincolnshire Authorities note the position now being advanced by the site promoter at examination for inclusion of 20% of the prospective site area of the Apleyhead allocation for B2 general industrial purposes. The Central Lincolnshire Authorities do not support the inclusion of B2 uses in any proportion based on the available submissions and evidence for the following broad reasons:

- The case made for inclusion of B2 uses has not been robustly evidenced unlike the case made for Apleyhead strategic allocation to meet the demands for large-scale regional logistics development. There has been no opportunity afforded for consultation on the promoters' proposed mix of uses nor has the proposition been tested through appropriate and robust evidence. The proposal within the submission plan for the Apleyhead site to meet the evidenced purpose as a large-scale regional logistics site is sound and, in the absence of evidence to the contrary, is effective.
- The promoter submits that the B2 uses could be of a sub-regional and/or regional scale that cannot be met by sites within the District. However, this case is advanced without the benefit of a thorough and proportionate examination of the regional market akin to that undertaken for logistics development (Examination documents TI-014 and TI-016), and thereby the impacts are unknown of the risk to the effective delivery of economic development strategies of adjoining local plans and the Local Industrial Strategies being promoted by Local Enterprise Partnerships. The promoter fails to provide a detailed and evidenced assessment of their proposal, and particularly bearing in mind the stated scale of their proportion of B2 development, fails to address the possible impacts throughout the market area that could be affected; indeed there is no such market area defined and the promoter simply, and wrongly, sees the issue as a District matter. It must be recognised that the promoters' proposal is, in and of itself, of a sub-regional scale with 20% amounting to a floorspace of c.90,000 sqm or c.20-24ha. It is respectfully submitted that at this scale, and taking cognisance of the differing local authority areas that could be affected, it represents a strategic allocation in its own right in Districts that have a more rural character.
- The proposals for B2 general industrial development are made on a speculative basis that large-scale needs for manufacturing cannot be met by reference to sites within the portfolio of employment land within the District. As set out above, at the scale proposed, there is a need to look beyond the District and elsewhere in the relevant market area and adjoining local planning authority areas. There is again no evidence that such large-scale footloose B2 development would select Apleyhead as a preferred location nor any assessment of the impacts on the implementation and delivery of employment development in the adjoining geography.

- The proposal for inclusion of B2 general industry also undermines one of the unique selling points of the Apleyhead site in terms of its evidenced attractiveness for large-scale B8 logistics use in terms of its strategic accessibility and connectivity provided by the A1 corridor and A57. The evidence available (TI-014 and TI-016) demonstrates a demand for B8 use and in this respect B2 development would serve to potentially limit the Apleyhead proposal from meeting such demand, particularly if such B2 development led to piecemeal sites and buildings coming forward which would undermine the ability to form large, unencumbered plots to deliver logistics buildings and uses that the evidence indicates is possible and attractive at this location. This is supported by the evidence including reference to paragraph 2.7 of examination document TI-014 that states “the PPG notes ... the logistics industry ... has distinct locational requirements that need to be considered in formulating planning policies (separately from those relating to general industrial land)”. The significant strategic advantages that the Apleyhead site has in terms of large-scale B8 logistics means that it should reasonably be reserved solely for such a function in the interests of the economy of the District, sub region and region and so that its function is not diminished by allowing B2 development that could be reasonably be located elsewhere. The proposed allocation solely for B8 logistics purposes is deemed to have been well-evidenced, positively prepared and effective when set against paragraphs 81-83 of the National Planning Policy Framework 2021 and the PPG (paragraph 031 Reference ID: 2a-031-20109722).
- The likely job density associated with B2 general industrial development would mean that the Apleyhead site, which is well-located, as it is evidenced it should be, to benefit logistics use means that it is in arguably a less sustainable location for employees. This would increase the need to travel, and in all likelihood by private car. B2 uses are often best served locationally by access to a pool of labour meaning they should be sited closer to centres of population in preference to a location to take advantage of access to the strategic road network.

Chesterfield:

Thank you for clarifying that the proposed split (sought from the site promoters) is now 80% B8 Logistics and 20% standalone generic ‘employment’ uses.

My understanding, as per the SoCG, is that the allocation is intended to meet the needs for large scale sub-regional and regional logistics.

My officer view is that I would have no objections to the proposed 80/20 split but would suggest that it may be necessary to restrict the 20% to employment uses that are ancillary to and connected with the B8 sub-regional/regional logistics operations.

In my view this restriction is likely to be necessary considering:

- the very large scale of the development (to put this into context, 20% of 118.7 hectares is approx. half of the total employment land requirement for the Chesterfield Local Plan 2018-2035)

- the scope of uses that can be considered as 'employment' (particularly in light of Use Class E)
- the potential for other more suitable locations within the PMA for non-B8 employment uses

Please note the comment above is officer only and has not received Member or Management approval. If you require a more formal response please let me know and I will try to get this as soon as possible.

Doncaster:

As you are aware, Doncaster Council supports the inclusion of Apleyhead as a Strategic employment allocation in the Bassetlaw Local Plan which will help meet the sub-regional/regional need for logistics. The proposed 80/20 split is in principle acceptable subject to clear justification to demonstrate that B2 is required for the viability and deliverability of the site. During the EiP into the Doncaster Local Plan, a similar discussion took place regarding Use Class B2 at iPort in Rossington. This site is a Strategic Rail Freight Interchange (Use Class B8) where a small amount of Use Class B2 is now acceptable.

Mansfield:

I am contacting you following the meeting that took place on 20 December 2022 between Bassetlaw district council and the various Property Market Area Authorities in relation to the proposed land use split that is being put forward by the promoter of the above site.

As part of the meeting, authorities were asked to provide their views on a possible split of B8 (80%) and B2 (20%) uses on this site. Mansfield district council would like to thank Bassetlaw district council for giving it the opportunity to provide its view on this matter and submit the following, officer level response for your consideration.

At present, Publication Local Plan Policy ST7 proposes that the Apleyhead site will be allocated for sub-regional and / or regional logistics (Class B8) only (with nine other sites identified to meet the districts employment needs). The position in relation to Apleyhead is also set out in paragraph 3.1.2 of the Statement of Common Ground that has been signed by the various Property Market Authorities, including Mansfield district council (examination document reference BDC-17).

On this basis, MDC's starting position is that the site at Apleyhead should remain for the use as currently proposed. However, it is acknowledged that as part of its submission on Matter 3 of the Local Plan Examination, the site promotor expresses the opinion that there should be greater flexibility in the uses permitted on this site. The reasons for this appear to be; that the NPPF requires policies to be flexible to allow a range of uses, and that the site may be able to accommodate a large-scale manufacturing company that due to size or requirement cannot be accommodated elsewhere.

Mansfield district council may be able to be supportive of the principle of the proposed split in uses if further information and clarification is forthcoming from the

promotor that allows a judgement to be made. The particular issues that the district council consider require such clarification are as follows:

To meet the identified need, the local plan already proposes to allocate approximately 196ha of developable land in the E(g), B2 and B8 Class Uses at the General and Larger Unit Employment Sites. The nine sites that will help achieve this are identified in policy ST7. In addition, Publication Local Plan Policy ST10 identifies 28 existing employment sites within the district that would be protected and that could be used for new or additional employment uses, including those within use class B2.

Therefore, in addition to the reasons in their statement for Matter 3 of the examination, clarity is sought as to why the promotor considers that a further 88,035m² of B2 use land on the site at Apleyhead is required. For example is it:

- Because they consider the sites covered in policies ST7 and ST10 are not large enough to accommodate certain types of B2 use?
- Is the site at Apleyhead considered unviable / deliverable if it solely allocated for strategic B8 uses and thus requires some enabling B2 development?

If the above are some of the reasons for seeking such a split of uses, it is felt that this should be supported by appropriate evidence.

Table 4 within the Bassetlaw Transport Study Addendum, November 22 (Examination document reference BDC-23) states that 88,035m² would be for B2 general industrial uses and 352,140m² for B8 warehouse / distribution uses. In terms of the B2 element, it would be helpful if the site promotor could confirm if the intention is for this to be for a single user or a number of smaller ones. If it would be for smaller plots, why could these not be accommodated elsewhere on the other sites proposed for allocation / existing employment sites?

Finally, it is understood that the purpose and rationale of the proposed allocation at Apleyhead is to provide space for regional / sub-regional B8 uses. It is therefore felt that the promotor of the site needs to demonstrate that the proposed split of B2 / B8 floorspace would not have a detrimental impact on the ability to deliver this wider objective.

Melton:

No issue with the new proposed employment split.

Newark and Sherwood:

Thank you for the opportunity to discuss the latest developments in relation to Bassetlaw Local Plan examination. As discussed at the meeting given the time constraints this response from Newark & Sherwood District Council is an Officer one.

The proposed Apleyhead allocation is a strategic one which seeks to help address the regional/sub-regional need for logistics sites. This need is backed by studies prepared by Bassetlaw District Council and the site promoters Caddick Developments Ltd and documented in a statement of common ground between the

parties and also Statements of common ground between Bassetlaw District Council and Local Authorities within the PMA. On the basis of the proposals within the Publication Bassetlaw Local Plan Newark & Sherwood District Council were happy to sign our SoCG, we are also happy that provision is made within the policy to allow enough flexibility for ancillary B2 use to meet operator needs. This is a sensible approach to the development of such a large site.

In terms of proposing an 80/20 logistics/B2 use I'm not clear what the evidence is to justify such an approach. This site is not being justified as a component of Bassetlaw's general employment land requirements, it is effectively additional too it. It is justified on regional/sub-regional need and therefore if 20% of the site is not helping to meet (or ancillary to it) this need then it cannot be justified. It is fine to have a flexible suite of employment sites to meet a target but this would be on top of Bassetlaw's already flexible approach. Apleyhead is a large site and even a 20% B2 provision would result in almost 23 hectares of additional general employment land. No consideration has been given to the impact of such a proposals other sites both within Bassetlaw or neighbouring authorities. For instance Newark & Sherwood have a strategic site in Edwinstowe with 11 hectares of employment land consented which is less than 10 miles away.

Given this uncertainty the District Council supports the current proposals outlined in the submitted Bassetlaw Local Plan and does not support a proposed 80/20 split on the site.

NE Derbyshire:

I refer to the meeting this morning during which you invited officer comments on issues raised during the examination into the Bassetlaw Local Plan. The Apleyhead Strategic Employment Site is included in the plan as a strategic distribution and warehousing site with 100% B8 uses, which is supported by the evidence base. A proposal has been raised during the Local Plan Examination to include provision for B2 (general industrial uses) at a ratio of 80(B8):20(B2) and you have asked for neighbouring authorities views on this.

I can confirm that I do not have any objection to such a split. As set out in previous dialogue between our authorities, only the eastern fringes of North East Derbyshire fall within the outer zone of influence for the A1 and as such I do not foresee that such a change would have any material impact upon the economic interests of this district.

Nottinghamshire County Council:

We generally support the approach of policy ST7 which specifies that the Apleyhead strategic allocation of 118.7ha is for regional/sub-regional logistics – and any uses outside the B8 class should be ancillary to the prime function and purpose of the allocation.

The Councils Bassetlaw Transport Study has adopted a working assumption involving a 80/20 split for B8/B2 uses and this has been updated in the recent Addendum.

Below is a clip from the BTS Addendum in respect of Apleyhead & A57 link capacity review. It compares the original BTS assumptions with amended assumptions now being proposed by the promoter.

Table 4 – Floor Area Comparison (sqm)

Land-Use	BTS	Proposed Development	Differences
B1 Business Park	0	0	0
B2 General Industrial	94,400	88,035	-6,365
B8 Warehouse / Distribution	377,600	352,140	-25,460
Totals	472,000	440,175	-31,825

3.1.3 The total development floor area assumed for the BTS was larger than the development now being promoted for SEM001.

As you are aware, the County Council is currently considering the BTS Addendum.

Notwithstanding our forthcoming response to this document, there appears to be need for more alignment between policy ST7 and the transport evidence base as these uses have different trip rates and therefore differential impacts on the highway network.

Should the proposed split not be acceptable to the Council and the allocation continue to be aimed purely at regional/sub regional logistics development, how might policy ST7 prevent the promoter from developing say up to 440,175 sqm metres of B8 floorspace (total of the “proposed development” scenario) or even 472,000 sqm (total in the original “BTS” scenario) - as compared to the 352,140 sqm B8 proposal in the Addendum. There are no floorspace restrictions in the current policy and whilst the current promoters have confirmed proposals to reduce the overall floorspace compared to the original BTS assumption, the land could be passed to another promoter with a different concept.

Whatever scenario is selected, inclusion of use class / floorspace capacity limits within policy ST7 would seem appropriate in order to align with the Councils transport evidence.

Rotherham:

From a transport perspective, the proposed mix of B2 and B8 does not change RMBC’s position as set out in the addendum of 6th December ’22 to our examination representation – namely that the volume of vehicular trip generation on Rotherham’s network associated with the revised development mix and quanta is not acceptable, without assessment of and mitigation for congestion, emissions and severance impacts associated with these additional vehicle trips. Whilst the reduced trip generation associated with the revised proposals is welcome, RMBC is not satisfied that trip generation is so low as to address our stated concerns. Moreover, RMBC would be concerned that it would not be possible under the Bassetlaw Local Plan as

drafted to control development quanta and use to that indicated in the latest proposals.

Sheffield:

The Regulation 19 Draft Sheffield Local Plan has been approved by the Council for public consultation in January. Supporting evidence in the Sheffield Logistics Study concludes that we need the Apleyhead site in order to meet the requirements within the wider Property Market Area (PMA) for large scale logistics, so would prefer to see the site as 100% B8. Due to supply constraints in Sheffield, we see Bassetlaw's supply as playing an important role in meeting the wider than local need for logistics across the wider PMA.

However, we recognise from our own Logistics Study that there can be viability and market benefits from having some split on individual sites, but we could only support this if there was clear viability evidence that this approach was justified in order to secure the delivery of the B8 element of the site.

To summarise, we would rather see the site remain as 100% B8 but would be willing to accept a reduction to 80% if the evidence supports it and can be shown to make the site more deliverable, in order to meet the need for large scale logistics in the wider Sheffield PMA that includes Bassetlaw.

South Kesteven:

Thank you for consulting South Kesteven District Council on the proposed 80/20 split at Apleyhead. South Kesteven District Council has instructed consultants to undertake an Employment Land Study which will inform the emerging South Kesteven Local Plan. I have liaised with our consultants and economic development team on this matter and consider that if the proposed B2 space at Apleyhead is strategic (rather than addressing identified demand in Bassetlaw), the B2 should be kept to a minimum to ensure that it does not contribute to a loss of B2 employment in South Kesteven District.