

Bassetlaw District Council response to Inspectors Action List

Action 73 - Matter 12 – ST51 Renewable Energy Generation

BDC to consider approach taken towards High Marnham and brownfield sites like it in the Plan noting that High Marnham is mentioned in Council's Plan and Local Plan Vision. BDC to liaise with Framptons, relevant partners and evidence to inform the approach.

BDC Response:

At the hearing session on 15 December 2023, the Inspector asked that the Council engage with Framptons to consider the approach to High Marnham and other similar large brownfield sites in the countryside in the Local Plan. Following positive discussions with Framptons, the Council are looking to propose a new strategic Local Plan policy (attached) to enable such large brownfield sites in the countryside to be considered positively for re-use and regeneration over the Plan period.

The District has a number of large brownfield sites in the countryside, many remain or partially remain in active economic use, others have been the focus of previous economic activity, such as the Former High Marnham Power Station site.

The Council acknowledges that the Plan would benefit from providing a policy framework that enables the positive consideration of such sites for economic use. As such, the new policy should be a strategic policy that can be equally applied to all large scale brownfield sites in the District's countryside, and should not be specific to any particular site.

To avoid being prescriptive and to provide sufficient flexibility to all landowners over the Plan period site-specific proposals are not identified. We consider that providing criteria for High Marnham is not necessary and leads to duplication with the provisions of other policies in the Plan, including Policy ST51.

Such sites are by definition of a strategic scale within the rural area, where countryside policies would typically apply. As such, they may also not be in the most sustainable locations.

The Council are of the view that the re-use of such sites, at the scale envisaged, should therefore be an exception to the countryside policies in the Plan. The new policy therefore promotes the re-use of such sites principally for uses that are not and could not be provided for in more sustainable locations within the settlement hierarchy.

However, it is also recognised that because of their scale and location, these sites may also offer the opportunity to secure environmental benefits that may not be seen elsewhere in the District. As such, it is proposed to broaden the remit of the policy to provide positive consideration of such sites where they can evidence demonstrable economic and environmental benefits. The intention is that this new policy would complement other environmental policies in the Plan including Policy ST51 and Policy ST40 for example.

As these sites are considered to be an exception to countryside policies, the Council is of the view that a proposal should meet an evidenced national, regional or sub-regional economic/environmental need. By doing so, the economic benefits are those that might not otherwise be secured through the Plan's economic strategy i.e. the general employment sites or the strategic employment site identified by Policy ST1 and Policy ST7. On that basis, a policy requirement is that jobs assumptions should also be provided (overall and for each phase) to ensure the economic and spatial strategy of the Plan is not undermined.

We consider that sub-regional/regional or national needs would encompass proposals that provide specialist economic services, as by definition there would not be multiple examples

elsewhere. This is considered to provide sufficient flexibility to facilitate wide ranging economic growth in these locations by a range of providers.

The Council is of the view that the local employment need is being met by the site allocations in ST7. To include local employment on these types of sites as a primary use is considered to undermine the economic strategy of the Local Plan. However, Part 2 provides flexibility to ensure that other economic uses can be accommodated on these sites subject to there being a clear functional relationship with the primary use of the site.

Given the size of these sites and the scale of development that could be accommodated it is important that a holistic approach is taken to the redevelopment of each site to ensure that different uses and phases are brought together carefully, as opposed to large scale piecemeal development which could lead to poorly integrated sites in the countryside.

The Council consider that the most appropriate tool to manage development at this strategic scale is a comprehensive masterplan that comprises the elements identified by Policy ST58, and as such is consistent with the approach taken to development across the rest of the Plan. This will ensure that decision-makers have the right type and level of information available to determine an initial application, and will provide the basis within which individual and cumulative impacts can be considered alongside other consented schemes. A masterplan will also provide a robust baseline against which the impacts of subsequent phases can be appropriately assessed.

We acknowledge that masterplans may evolve over time but it is important that there is a robust baseline for the Council and its partners to consider future applications against. That way, potential impacts can be fully understood at the time of application and as each subsequent phase progresses. It is therefore considered reasonable for any material change to the masterplan agreed as part of the initial application to be justified.

As such, the new policy is considered to provide a robust and justified framework within which to consider and appropriately manage proposals on large brownfield sites particularly given their potential accessibility, landscape and community impacts, the potential mix of uses that could be accommodated and the long term timescales for delivery.

Criteria 1d) and e) have been identified following consideration of the types of issues that are commonly raised for large rural sites in the Council's LAA [BG-030] and Sustainability Appraisal [PUB-024] and other evidence base documents relating to landscape, biodiversity and heritage.

In terms of 1d) the Council is of the view that no significant adverse impact should be the test to align with the NPPF paragraph 32.

Criteria 1e) is reflective of that used for other large sites in the Plan as agreed with the Highways Authorities so is considered to provide an appropriate framework for large brownfield sites when taken with other transport policies in the Plan.

The Council is not intending to manage the re-use of large brownfield sites (including Marnham) through supplementary planning documents as evidenced by the LDS [BG-024]. Should proposals for other sites come forward the Council is confident that the re-use/redevelopment can be managed through the new policy and through the masterplan framework proposed. In that way, proposals for each site would be treated on an equal basis.

As such, the new policy is considered to be consistent with the NPPF which seeks to help build a strong, responsive and competitive economy (paragraph 8) but is also flexible enough to accommodate changing needs and enable a response to changes in economic

circumstances (paragraph 82). It is also in accordance with the environmental objectives of national policy which seek to make effective use of land, use natural resources prudently and mitigate and adapt to climate change, including moving to a low carbon economy (paragraph 8).

Key

Black text – BDC/Framptons in agreement

Red text – BDC wording

Green text – Framptons wording

Development on large brownfield sites in the countryside

1. National policy encourages the re-use of previously developed or brownfield land provided that it does not cause harm to designated biodiversity sites.
2. There are a number of large brownfield sites across the District's countryside that have been the focus of previous economic activity, or remain (or partially remain) in active economic use. While Policy ST11 provides the framework for the re-use and redevelopment of small-scale sites for economic activity in the countryside, this Plan needs to provide guidance on how development and investment opportunities at large brownfield sites with the potential to accommodate development at a strategic scale should be considered.
3. Such sites are outside of the development boundaries/built up areas of settlements and so for the purposes of the spatial strategy, countryside policies apply. On that basis, exceptionally, proposals for development on large brownfield sites in the rural area will be considered where they are consistent with Policy ? and other relevant policies in this Plan.
4. The approach taken by Policy ? is that the re-use of such sites should be principally for uses that are not and could not be provided for in more sustainable locations in the District, such as within or on the edge of the Main Towns or Large Rural Settlements. Proposals considered by this policy should therefore be in accordance with the spatial strategy in Policy ST1 and in terms of employment use should not undermine the approach taken by the Plan's economic strategy in Policy ST7.
5. National policy is clear that a careful balance needs to be achieved when assessing large-scale developments on brownfield sites. In the District it is necessary to assess whether there are strategic economic and/or environmental benefits in utilising large brownfield sites for the use proposed. However, this will need to be balanced against a number of factors; including, the impact upon: the character and appearance of an area: the landscape and environment: and also residential amenity.
6. Such sites tend to be in locations that are some distance away from existing centres of population and activity, so are often not the most sustainable in terms of access and linkages. In these circumstances, and for consistency with national policy, it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads, taking into account previous use, and exploits any opportunities to make a location more sustainable (for example by improving access on foot, by cycling or by public transport).
7. It is essential a holistic approach to these large brownfield sites is established to ensure that the various elements and phases of a proposal are brought together in a carefully considered and well thought out manner, as opposed to a piecemeal approach which could result in a poorly integrated, disconnected series of developments. This is particularly important given the countryside location of these sites, their accessibility, potential landscape and community impacts and the need for development to minimise any significant harm within these locations.

On that basis, a comprehensive masterplan for the wider site will be required to accompany a proposal. Whilst it is acknowledged that subsequent proposals/phases may alter from an initial masterplan to respond to technological advances or environmental standards for

example, in recognition of the location and scale of development at these large sites, proposals that materially depart from the initial masterplan should be justified. It is acknowledged that masterplans for sites of large scale typically evolve over time in response to technological, environmental and market change.

8. A masterplan will need to set out key development principles to ensure certainty on outcomes for key stakeholders, including infrastructure partners and the affected community and will help to ensure that proposals do not prejudice each other, or the wider aspirations of the spatial strategy and other relevant policies in this Plan.
9. Proposals will also be required to identify the jobs assumptions being proposed, as full time equivalents. This information will enable the Council to effectively consider the merits of the proposal in the context of Bassetlaw's Spatial Strategy (Policy ST1) and the employment strategy in Policy ST7.
10. The former High Marnham Power Station is a redundant brownfield asset of substantial scale and is of strategic significance beyond a District level. To encourage opportunities for new investment Policy XX provides further guidance on the forms of new development that will be supported in principle at High Marnham.

Policy ? Large Rural Brownfield Sites

1. Proposals for the re-use and re-development of large brownfield sites in the countryside that make effective and efficient use of land for economic and/or environmental activity will be expected to deliver a scheme in accordance a comprehensive masterplan framework for the site consistent with other relevant policies in this Plan and the following criteria:
 - a) The proposal makes provision for an evidenced national, regional or local sub-regional economic need;
 - b) The form and scale of the proposal is consistent with this Plan's spatial strategy and that it cannot be reasonably provided elsewhere in the District;
 - c) The nature of the proposed development should achieve demonstrable economic and/or environmental benefits compared with the current use and condition of the site.
 - d) The scale and nature of the proposal will have no unacceptable/significant adverse impact upon the character of the location, the surrounding landscape, biodiversity or heritage assets, amenity and affected local communities;
 - e) The need to travel by private vehicle has been minimised, and the need for appropriate sustainable transport measures and any highway improvements have been identified;
 - f) The number of jobs assumptions overall and by phase, identified as full-time equivalents is consistent with the Spatial Strategy (Policy ST1) and the Provision of Land for Employment Development (Policy ST7).
2. Any non-economic and environmental uses within a large brownfield site will only be supported where it can be demonstrated that it is consistent with Part 1 above and:
 - a) There is a clear functional relationship with the primary economic and/or environmental purpose of the site; and

- b) It is of a scale that is appropriate to that relationship;
 - c) when considered individually or cumulatively with other existing or consented development on site it would not result in an over-concentration that might affect the function and appearance of the area.
3. Where a proposal materially departs from an existing masterplan justification will need to be provided for the approach.

The approach to specific sites of this nature where the principle regeneration is supported is set out below:

1. The former High Marnham Power Station.

The following uses are appropriate in principle:

- a. Development that generates, shares, transmits and/or stores zero carbon and/or low carbon energy in accordance with Policy ST51.
- b. Development to meet local business needs.
- c. Employment development that would benefit from the availability of renewable energy generated at or around the former High Marnham Power Station or which requires an extensive availability of electrical power from high voltage substations to meet operational needs.
- d. Businesses that can utilise waste / by-products (e.g., heat) generated from other businesses and operations at the former High Marnham Power Station as an energy resource, for example, controlled environment agriculture to promote a 'circular economy'.
- e. Other development where a locational advantage is demonstrated with the availability of renewable energy generated at and around the former High Marnham Power Station. The availability of electrical power for the high voltage substation or the availability of National Grid Infrastructure.