

Newark & Sherwood Allocations and Development Management DPD Examination - Matter 6: Employment Development

Bellway Homes Ltd (respondent no: 052)

October 2024

Introduction

1. This Hearing Statement is submitted in response to the Newark and Sherwood Amended Allocations and Development Management DPD Examination ('AA&DMDDP') on behalf of Bellway Homes Ltd ('Bellway') in respect of their land interests at the site referred to as "*Land to the north of the A617, Rainworth*" ('the site').
2. We respond Matter 6: Employment Development, Issue 1 - Whether the Plan will contribute to the vitality and viability of Town, District and Local Centre questions: 6.1, 6.5b, 6.5d and 6.5e.
3. Please note, Regulation 19 representations were submitted on behalf of Bellway in November 2023 and January 2022. The representations submitted are included in the Council's "*Statement of Consultation*" submission document (Ref: CD12) and appear in Appendix C and D (respondent no: 052/representation number(s): 0128, 0126, 0127, 0213, 0211, 0212). We would direct the attention of the Inspector to these representations which contain further detail in respect of the site and key points raised, which have not otherwise been addressed by the Council in their response to representations.

Issue 1

Question 6.1: Are the scenarios in the Nottingham Core HMA and Nottingham Outer HMA Employment Land Needs Study (the Employment Land Needs Study) soundly based and justified?

4. As set out in response to Matter 2, several of the evidence base documents underpinning the emerging AA&DMDDP, including in respect of employment land and needs, are considered to be dated, having previously formed part of the evidence base for the amended Core Strategy, adopted in March 2019. It should be noted that the Core Strategy was originally adopted in 2011.
5. Paragraph 33 of the National Planning Policy Framework (NPPF, 2023) sets out a requirement for policies within a Local Plan to be reviewed every 5 years. Since the Amended Core Strategy is now over 5 years post adoption, and as such, is in need of review (as noted at paragraph 1.32 of the AA&DMDDP), the evidence base documents this plan is informed by and subsequently, those included in the evidence base for the AA&DMDDP, are also considered to be dated and in need of update. It is noted that the Employment Land Needs Study draws upon the Employment Land Forecasting Study, published in August 2015, which is also included as part of the evidence base for the AA&DMDDP. This document is nearly 10 years old and therefore considered dated.

6. On this basis, and as previously set out in the submitted representations, Bellway are of the view that the AA&DMDDP should set out a firm commitment to commencing a full review of the Local Plan immediately following the adoption of the AA&DMDDP. This notwithstanding, given the time it takes to prepare a Local Plan and noting the ongoing planning reform in respect of plan making, the Council should urgently commence the update of the Local Plan evidence base, particularly in respect of housing and employment land. This will be particularly important given the proposed changes to the NPPF and increasing need to deliver economic growth nationally.
7. As the Council commence the update of the evidence base in the preparation of a new Local Plan, Bellway would welcome the opportunity to engage further and directly with the Council in respect of the site in Rainworth. The site represents a significant opportunity for Sustainable Urban Extension (SUE) scale growth of a mixture of uses, including employment, directly north of an existing "Service Centre" (tier 2 settlement as established by the Amended Core Strategy, 2019) in the Mansfield Fringe Area.

Question 6.5b: Is the allocation consistent with the development strategy in the Core Strategy?

8. The AA&DMDDP identifies an employment land requirement of 83.1 hectares which was established by Spatial Policy 2 of the adopted Amended Core Strategy, to be distributed amongst the five areas for the period 2013 – 2033. Employment land supply is identified as 185.56 hectares, delivering an oversupply against the requirement.
9. The Amended Core Strategy identifies a requirement for 10.4 hectares of new employment land in the Mansfield Fringe Area during the plan period. Paragraph 6.5 of the AA&DMDDP identifies a guideline requirement for 10.4 hectares of new employment land in the Mansfield Fringe Area during the plan period and is therefore consistent with the Core Strategy.
10. This notwithstanding, as set out in response to question 6.1, the evidence base underpinning the requirement is considered to be dated and in need of an urgent update as part of the preparation of a new Local Plan.

Question 6.5d: Are the development requirements clear and deliverable and are any further safeguards or mitigation measures necessary to achieve an acceptable form of development? Are any main modifications necessary for soundness? AND Question 6.5e: Have any further permissions been granted since the Plan was submitted for Examination?

11. Paragraph 1.28 of the AA&DMDDP states that in total the District has a supply of 185.56 hectares of employment land, which is an increase from 176.69 hectares in the previous iteration of the plan. However, as outlined in Paragraph 1.30, there are concerns that the anticipated levels of employment land delivery may not be fully realised, mirroring the challenges experienced with housing delivery. This suggests that while the overall supply has increased, there is uncertainty surrounding the achievement of the planned targets. To ensure a degree of flexibility should some sites not deliver or be slow to deliver, a broad range of sites should be allocated by the plan.
12. The 2023 Employment Land Availability Study covering the period from 1 April 2022 to 31 March 2023, indicates that the total supply of employment land across the district up to 2033 is 186.62 hectares, leaving a marginal buffer for future employment growth.
13. The study notes that in the Mansfield Fringe Area 17.83 hectares of land is allocated for future employment use including 5.50 hectares at the land west of Colliery Lane, Rainworth (employment allocation Ra/E/1 Rainworth). This site represents a significant portion of the

employment land in the Mansfield Fringe Area and therefore plays an important role in the area's future economic growth.

14. In the current trajectory for employment land delivery, 3.83 hectares of the West of Colliery Lane site is projected to be delivered between 2023 and 2028, and 1.67 hectares between 2028 and 2033.
15. This notwithstanding, the site was the subject of an outline planning application (application ref: 21/00996/OUTM) for 91 dwellings submitted in April 2021. This received a resolution to grant planning permission at Planning Committee in October 2023. The Applicant argued that this site is not appropriate for employment use given its site constraints. Although the planning permission for this site has not yet been formally granted (i.e. a decision notice issued) pending a Section 106 Agreement, should this occur, an additional site allocation for employment development would need to be identified to provide sufficient land in the Mansfield Fringe Area for employment development.
16. As stated in the submitted Regulation 19 representations, the land to the north of the A617, Rainworth, is available and represents a significant opportunity to provide a mixed-use development, with employment and housing capacity available in the short-term to meet the needs of the District and specifically of the Mansfield Fringe Area. The site also has the potential to deliver strategic scale growth in the long term to meet future needs.

Contact

Jessica Herritty



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