Local Plan for Bolsover District

Position Paper relating to Employment Provision

August 2018
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1) Introduction

1.1 This paper sets out the Council’s position in relation to the provision of B class employment land.


1.3 In order to demonstrate a comprehensive, robust and sound approach, the paper covers the following issues:-

- The evidence underpinning the Employment land requirement, and the various scenarios used and which are the most appropriate for informing an employment land target;
- Evidence of employment land delivery;
- Employment land losses over the plan period;
- Site Selection methodology and Sustainability Appraisal;
- Functional Economic Market Area.

1.5 It should be noted that when discussing the provision of B class employment land the Plan takes its start date from when the EDNA was produced in 2015, so covering an 18 year period from 2015 to 2033. Also because the EDNA was produced in 2015 and the Employment Target range approved in 2016, the discussion around these issues dates back to 2016.

1.6 It should also be noted that a new evidence base document, the Lichfield’s Study 2018 has been published since publication of the Local Plan. The contents of this document did not inform the Publication Local Plan and have not been taken into account in this Position Paper. The study was done in relation to concerns over what some have perceived as an imbalance between our employment provision and our housing provision.

1.7 Overall the study casts an interesting update across the evidence base in relation to employment land. Importantly it notes that the 92 ha emerging Local Plan Policy SS2 figure sits within the new range they have suggested, albeit somewhat below the 112 ha single figure recommendation they made. In general, however, they note that there remains a reasonably close alignment between the new economic evidence and the Council’s emerging Local Plan B-Class employment land target.

1.8 The Council is concerned that if we were to rely on a new evidence base, such as this study is based on, this may raise some issues in relation to the
alignment of the various studies that the Local Plan is based on. Amending our employment figure may lead to further suggestions that we should amend our housing figures based on the new data, leading to a need to renew our Sustainability Appraisal, with more and more delays to the Local Plan.

1.9 Therefore, on the basis that the study recognises that our existing evidence base and work on employment remains in reasonably close alignment with the newer data, and the current allocation level falls within the proposed range, it is not intended to amend the Plan based on this study. It is the Council’s view we have ensured that the Plan meets these requirements. That does not necessitate following a process with a number of variables, which has question marks over its robustness and results in a requirement for an a highly questionable high level of housing, just because it is modelled on an economic growth agenda. Market and economic signals clearly indicate that such a level of housing is very unlikely to materialise.

1.10 Finally, in preparing this paper it has been considered that setting out the Council’s position in relation to B class employment land and the Local Plan for Bolsover District.
2) Evidence for Job Growth and Land Requirements

2.1 The first NPPF\(^1\) states that Local Planning Authorities should ensure that its Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Local planning authorities should use this evidence base to assess the needs for land or floorspace for economic development. To achieve this, they should work together with County and Neighbouring Authorities and with Local Enterprise Partnerships to prepare and maintain a robust evidence base to understand both existing business needs and likely changes in the market.

2.2 The Planning Practice Guidance (PPG) advice on ‘Housing and Economic Land Availability Assessments’ provides further detail about how need should be calculated. It advises that there is no one methodological approach or use of a particular dataset that will provide a definitive assessment of development need.\(^2\) A number of methodological approaches will therefore need to be considered, before deciding upon a target.

2.3 The PPG states that the key output of the evidence base is an estimate of the scale of future needs, broken down by economic sectors. It also advises that local authorities should develop an idea of future needs based on a range of data which is current and robust. Examples of the range of data\(^3\) that plan makers should consider are addressed below.

Range Of Data

**Sectoral and employment forecasts and projections (labour demand);**

2.4 This method considers which sectors of the economy are likely to grow and which are likely to contract. The forecasts use past national trends, for example, the contraction of the manufacturing sector, and current government policy to reduce public spending. The data is disaggregated down to district council level, so that national trends are reflected locally.

**Demographically derived assessments of future employment needs (labour supply techniques);**

2.5 This method looks at the number of people of working age (economically active) in the district that theoretically would need a job during the plan period taking into account proposed housing growth.

\(^1\) NPPF Paragraph 158
\(^2\) PPG Paragraph: 005Reference ID: 2a-005-20140306
\(^3\) PPG Paragraph: 032Reference ID: 2a-032-20140306
Past take-up of employment land and property and/or future property market requirements;

2.6 This method looks at the average amount of employment land developed over a period of time and projects that into the future.

Liaising with the Business Community

2.7 The PPG\(^4\) also states that plan makers should liaise closely with the business community to understand their current and potential future requirements, which in essence means finding out whether existing businesses need to expand, and what their land requirements are.

Economic Development Needs Assessment (2015) or EDNA

2.8 A brief was drawn up that reflected the detailed guidance in the PPG and consultants Nathaniel Lichfield and Partners (NLP) were commissioned to undertake an Economic Development Needs Assessment. The EDNA provides an assessment of employment land needed within Bolsover District for the period 2015 – 2033 using a range of data that is current and robust and has informed the plan making process.

2.9 It should be noted that the Local Economic Partnerships, Sheffield City Region and D2N2 were involved in the EDNA in the following ways:

- The LEPS were invited to take part in telephone interviews in order to understand the economic background. Sheffield City Region took part.
- The LEPS were invited to send a representative to the Visioning workshop that took place on the 4\(^{th}\) August 2015, but no representatives of either LEP attended the event.
- One of the forecasting models used in the study (FLUTE) was also used by the Sheffield City Region LEP.

2.10 Following the PPG guidance, the EDNA provides four separate scenarios that the Council used to inform its employment land target. Table 1 below shows that there is wide variation between the methods with the Labour Supply scenario yielding just 23.3 hectares and the past take up method yielding 129.5 hectares respectively.

2.11 Each of these scenarios will be examined in turn to understand the background to them and consider how appropriate they are for use as a target to inform Bolsover District’s Local Plan.

\(^4\) PPG Paragraph: 030Reference ID: 2a-030-20140306
### Table 1: EDNA 2015 Four Scenarios for the Employment Land Requirement

<table>
<thead>
<tr>
<th>Scenario</th>
<th>B1 a/b Office</th>
<th>B1 c / B2 Industrial</th>
<th>B8 Storage and Warehousing</th>
<th>Totals</th>
</tr>
</thead>
<tbody>
<tr>
<td>Oxford Economics Forecasts</td>
<td>5.9</td>
<td>5.2</td>
<td>14.0</td>
<td>25.1</td>
</tr>
<tr>
<td>Ekosgen Forecasts</td>
<td>9.5</td>
<td>15.4</td>
<td>20.7</td>
<td>45.6</td>
</tr>
<tr>
<td>Past Take up Rates</td>
<td>19.8</td>
<td>25.1</td>
<td>84.6</td>
<td>129.5</td>
</tr>
<tr>
<td>Labour Supply</td>
<td>4.7</td>
<td>6.9</td>
<td>11.7</td>
<td>23.3</td>
</tr>
</tbody>
</table>

### Job Forecasts


2.12 In order to have the most up-to-date evidence at the time the Council instructed Nathaniel Lichfield and Partners (NLP) to commission employment forecasts from Oxford Economics. The forecasts covered a 15 year period from 2015 to 2030 and jobs were forecast to increase by 3,500 from 36,200 in 2015 to 39,700 by 2030.

2.13 However, the Local Plan period runs to 2033 and therefore it was necessary to extrapolate the percentage growth rate towards the end of the forecast period (0.3%) forwards for another three years. So by 2033 jobs are forecast to be at 40,000; a rise of 3,800 jobs over the plan period. The land requirement over the plan period through this method is 32.2 hectares. NLP have broken this figure down into the three B class sectors as shown in Table 2 below.

#### Table 2: Oxford Economic Forecasts Land Requirements for the B Class uses.

<table>
<thead>
<tr>
<th>B class Sector</th>
<th>Hectares</th>
</tr>
</thead>
<tbody>
<tr>
<td>Offices (B1 a + b)</td>
<td>5.3</td>
</tr>
<tr>
<td>Manufacturing (B2 and B1 c.)</td>
<td>12.1</td>
</tr>
<tr>
<td>Warehousing (B8)</td>
<td>14.8</td>
</tr>
<tr>
<td>Total</td>
<td>32.2</td>
</tr>
</tbody>
</table>

2.14 From 2015 to 2030 the forecasts identify employment sectors that are modelled to either grow or contract in the district. In order to check the accuracy of these forecasts, a broad comparison can be undertaken with
the likely jobs that would have come forward through full planning permissions granted as of 2015 that the Council was confident would come forward in the next 5 years. Translating these employment sectors (standard industrial classification sectors) into the nearest possible use class is shown in table 3 below. Translating is not an exact science and requires a degree of professional judgement.

### Table 3: Employment sectors that Oxford Economics Forecast to grow by 2020

<table>
<thead>
<tr>
<th>Sector</th>
<th>Increase in Jobs</th>
<th>B1</th>
<th>B8</th>
<th>A1</th>
<th>SG</th>
<th>No Use Class</th>
</tr>
</thead>
<tbody>
<tr>
<td>Administrative and support services</td>
<td>+ 700</td>
<td>300</td>
<td>100</td>
<td></td>
<td></td>
<td>300</td>
</tr>
<tr>
<td>Construction</td>
<td>+ 300</td>
<td>100</td>
<td>100</td>
<td></td>
<td></td>
<td>100</td>
</tr>
<tr>
<td>Professional, Scientific and Technical Activities</td>
<td>+ 200</td>
<td>200</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Information and Communications</td>
<td>+ 200</td>
<td>200</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Wholesale, Retail Trade, inc. repair of motor vehicles</td>
<td>+ 200</td>
<td>80</td>
<td>100</td>
<td>20</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Transportation and Storage</td>
<td>+ 200</td>
<td>160</td>
<td></td>
<td></td>
<td></td>
<td>40</td>
</tr>
<tr>
<td>Total</td>
<td>1,800</td>
<td>800</td>
<td>440</td>
<td>100</td>
<td>60</td>
<td>400</td>
</tr>
<tr>
<td>Percentage</td>
<td>100%</td>
<td>44</td>
<td>24.5.5</td>
<td>3.3</td>
<td>22</td>
<td></td>
</tr>
</tbody>
</table>

Scenario 2: Ekosgen forecasts for the Sheffield City Region LEP

2.15 At Local Plan examinations, Inspectors have advised that local authorities should not rely on just one set of forecasts.

2.16 The EDNA also used the Ekosgen forecasts that have informed the FLUTE (Future Land Use Transport and Economy) model that provides evidence for the Sheffield City Region (SCR) Local Enterprise Partnership. The forecasts align with the SCR 70,000 jobs target between 2014 and 2024. NLP have adjusted this figure by extending the time periods to take into account the Local Plan period up until 2033. The land requirements using this method are shown in Table 4 below.
### Table 4: Ekosgen Forecasts Land Requirements for the B Class uses

<table>
<thead>
<tr>
<th>B class Sector</th>
<th>Hectares</th>
</tr>
</thead>
<tbody>
<tr>
<td>Offices (B1 a + b)</td>
<td>9.5</td>
</tr>
<tr>
<td>Manufacturing (B2 and B1 c.)</td>
<td>15.4</td>
</tr>
<tr>
<td>Warehousing (B8)</td>
<td>20.7</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>45.6</strong></td>
</tr>
</tbody>
</table>

2.17 The 70,000 net additional jobs between 2014 and 2024 outlined in the Sheffield City Region, Integrated Infrastructure Plan, Sectoral and Local Authority Distribution of SCR 70,000 Jobs Target Assumptions Report, is described as a target, reflecting the SCR LEP’s consideration of the economic potential of the sub-regional economy, and represents an increase of 10% on current employment levels. Implicit within the target is the need for increased investment in economic infrastructure, business support and skills development to achieve what would be an exceptional level of private sector led employment growth. The 70,000 jobs is shared out between the nine local authorities that make up the Sheffield City Region. Bolsover’s share of this total is 4,100 jobs between 2014 and 2024.

2.18 Unlike Oxford Economics, the Ekosgen forecasts are not shown on a year by year basis, therefore they do not show the first 5 years’ worth of jobs forecast by 2020. The only way therefore to compare these forecasts with existing planning permission information is to divide the ten year 2014 – 2024 forecast jobs total by two, in order to estimate 5 years’ worth of jobs forecast. As with the Oxford Economics scenario, the job figures are translated into use classes and percentages to help make the comparison possible, shown in Table 5 below.

### Table 5: Estimation of Employment sectors that Ekosgen Forecast to grow between 2014 – 2019 translated into Use Classes

<table>
<thead>
<tr>
<th>Translation into Use Class</th>
<th>Sector</th>
<th>Increase in Jobs</th>
<th>B8</th>
<th>B1 a &amp; b</th>
<th>B2/ B1c</th>
<th>A1</th>
<th>A3/ A4/ A5</th>
<th>C1</th>
<th>C2</th>
<th>D1</th>
<th>No Use Class</th>
</tr>
</thead>
<tbody>
<tr>
<td>Logistics and Transport</td>
<td>425</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Business Services</td>
<td>375</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Financial and Professional Services</td>
<td>350</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

\(5\) 4,100 is a net figure. 4,538 jobs are forecast by 2024 but removing the 438 jobs in the sectors that are forecast to contract leaves a net figure of 4,100.
The jobs likely to come forward through the full planning permissions for employment development that in 2015 the Council was confident would be delivered is shown in the following table.

<table>
<thead>
<tr>
<th>Use Class</th>
<th>Number of Jobs</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>A1</td>
<td>134</td>
<td>7%</td>
</tr>
<tr>
<td>B8</td>
<td>1,202</td>
<td>63%</td>
</tr>
<tr>
<td>B2/B1c</td>
<td>518</td>
<td>27%</td>
</tr>
<tr>
<td>D1</td>
<td>27</td>
<td>1.4%</td>
</tr>
<tr>
<td>B1</td>
<td>19</td>
<td>1%</td>
</tr>
<tr>
<td>SG</td>
<td>6</td>
<td>0.3%</td>
</tr>
</tbody>
</table>

2.20 The comparison between the jobs estimated by Ekosgen forecasts 2014 – 2019, the jobs estimated by the Oxford Economics forecasts and the estimates of jobs likely to come forward through the granting of Planning permissions as of 2015 is shown in Table 7 below.

|----------------------------------------|---------------------------------------------|--------------------------------------------|-----------------------------|

<p>| | | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>B1 a &amp; b</td>
<td>31.8 %</td>
<td>44.4%</td>
</tr>
<tr>
<td>B6</td>
<td>20.9%</td>
<td>24.4%</td>
</tr>
<tr>
<td>Sui Generis</td>
<td>0%</td>
<td>25.5%</td>
</tr>
<tr>
<td>B2 &amp; B1 c</td>
<td>12.1%</td>
<td>0%</td>
</tr>
<tr>
<td>A1</td>
<td>6.6%</td>
<td>5.5%</td>
</tr>
<tr>
<td>D1</td>
<td>3.1%</td>
<td>1.4%</td>
</tr>
<tr>
<td>A3/A4/A5</td>
<td>5.4%</td>
<td>-</td>
</tr>
<tr>
<td>C1</td>
<td>0.5%</td>
<td>-</td>
</tr>
<tr>
<td>C2</td>
<td>2.6%</td>
<td>-</td>
</tr>
</tbody>
</table>

2.21 It is worth noting that the estimated amount of jobs over the 5 year period, 1,800 (Oxford Economics), 2,269 (Ekosgen) and 1,906 (Planning permissions) are broadly similar. However, the sets of information differ quite distinctly in the following ways:

- the 31.8% (Ekosgen) and 44.4% (OE) forecast growth in B1 (a) & (b) (Offices) is not reflected in planning permissions, where only 1% of jobs growth was actually expected to take place;
- the 20.9% (Ekosgen) and 24.4% forecast growth in B8 (Storage and Distribution) considerably underestimates the amount of jobs associated with planning permissions (63%).

2.22 With the benefit of hindsight these identified differences have proved to be true because in terms of take-up of new employment land between 2015 and 2018 there have been 0ha of new take-up for office development and 23ha of new take-up for warehousing.

2.23 With any long term forecast model there will always be an element of ‘crystal ball gazing’, and despite being based on current employment trends, the information itself - and indeed any land requirements resulting from it - need to be treated with caution. Indeed, as the EDNA states 7

“The forecasts are not constrained by labour or land supply. In addition, whilst stated government policy is considered by Oxford Economics in order to help to frame the future macroeconomic outlook, the forecasts do not take account of any: local policy interventions; planned major developments; or infrastructure changes at the local/regional level. Econometric forecasts of this nature tend to be most reliable at the regional and national level and less so when considering local economies. This is particularly true for smaller, rural/semi-rural economies such as Bolsover. Nevertheless, they provide a valuable input by indicating the broad scale and direction of economic growth in different sectors, thereby helping to assess future land requirements.”

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7 EDNA Paragraphs 9.7 and 9.8.
2.24 The PPG also advises that:

“Plan makers should be careful to consider that national economic trends may not automatically translate to particular areas with a distinct employment base.".

2.25 If forecasts are so uncertain over the first 5 years – and don't take into account the new jobs that are likely to come forward through planning permissions, as a fairly trustworthy source of such information, their reliability over a longer period must be questionable. Both forecasts appear to overestimate the amount of jobs that are likely to come forward in the B1 (a & b) use class, and grossly underestimate the amount of B8 jobs – and the difference in the amount of land needed for warehousing as opposed to offices is significant in land use planning terms.

2.26 It should also be noted that the total land requirements for both forecasts was well below the amount of land that had planning permission as of 2015 which was 79.74 ha. Additionally, Job forecasts do not recognise that jobs can come forward by firms increasing job density on existing employment sites, and therefore new land take-up would not be needed.

Scenario 3: Past Take Up

2.27 The third method of estimating future employment land is the projecting forward of past take up rates. Past take up rates reflect demonstrable market demand, as well as development patterns 'on the ground'. Long term take-up rates can – in some instances – provide a reasonable basis for estimating future land needs. Completions data spanning a period between 2000 and 2015 should even out demand fluctuations over a business cycle. As such, they would ordinarily provide a reasonable starting point for estimating future needs in the event that supply has not been unduly constrained over the period, which is the case in Bolsover District. Future land requirements under this method are as follows.

<table>
<thead>
<tr>
<th>Table 8: Land Requirements for the B Class uses based on past take-up rates</th>
</tr>
</thead>
<tbody>
<tr>
<td>B class Sector</td>
</tr>
<tr>
<td>Offices (B1 a + b)</td>
</tr>
<tr>
<td>Manufacturing (B2 and B1 c.)</td>
</tr>
<tr>
<td>Warehousing (B8)</td>
</tr>
<tr>
<td><strong>Total</strong></td>
</tr>
</tbody>
</table>

---

8 PPG Paragraph: 033Reference ID: 2a-033-20140306
2.28 In order to make a judgement about whether the past growth rates will continue into the future and cover the plan period, it is important to understand why the relatively high growth rate took place over the last 15 years, shown by year and B use class in the following table.

2.29 The table shows, the average growth rate for the three B Use classes together between 1999 and 2015 is 7.19 ha per year. It should be noted that as not all employment land is B1 – B8, rows do not tally.

<table>
<thead>
<tr>
<th>Year</th>
<th>Total ha</th>
<th>B1</th>
<th>B2</th>
<th>B8</th>
</tr>
</thead>
<tbody>
<tr>
<td>2014 – 2015</td>
<td>1.42</td>
<td>0.86</td>
<td>0.13</td>
<td>0.43</td>
</tr>
<tr>
<td>2013 – 2014</td>
<td>6.26</td>
<td></td>
<td></td>
<td>6.26</td>
</tr>
<tr>
<td>2012 – 2013</td>
<td>20.19</td>
<td>1.18</td>
<td></td>
<td>19.01</td>
</tr>
<tr>
<td>2011 – 2012</td>
<td>5.51</td>
<td>0.05</td>
<td></td>
<td>5.46</td>
</tr>
<tr>
<td>2010 – 2011</td>
<td>0.76</td>
<td>0.76</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2009 – 2010</td>
<td>0</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2008 – 2009</td>
<td>1.19</td>
<td>1.19</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2007 – 2008</td>
<td>7.07</td>
<td>1.9</td>
<td>1.4</td>
<td>3.77</td>
</tr>
<tr>
<td>2006 – 2007</td>
<td>6.12</td>
<td>4.93</td>
<td>0.46</td>
<td>0.73</td>
</tr>
<tr>
<td>2005 – 2006</td>
<td>7.77</td>
<td>1.92</td>
<td></td>
<td>5.85</td>
</tr>
<tr>
<td>2004 – 2005</td>
<td>25.62</td>
<td>1.8</td>
<td>0.2</td>
<td>23.62</td>
</tr>
<tr>
<td>2003 – 2004</td>
<td>5.49</td>
<td>1.48</td>
<td>3.72</td>
<td>0.29</td>
</tr>
<tr>
<td>2002 – 2003</td>
<td>2.81</td>
<td>1.11</td>
<td>1.7</td>
<td></td>
</tr>
<tr>
<td>2001 – 2002</td>
<td>9.58</td>
<td>1.9</td>
<td>6.6</td>
<td>1.08</td>
</tr>
<tr>
<td>2000 – 2001</td>
<td>4.03</td>
<td>0.72</td>
<td>3.31</td>
<td></td>
</tr>
<tr>
<td>1999 – 2000</td>
<td>11.32</td>
<td>0.67</td>
<td>8.55</td>
<td>2.1</td>
</tr>
<tr>
<td>Totals</td>
<td>115.14</td>
<td>20.47</td>
<td>26.07</td>
<td>68.60</td>
</tr>
</tbody>
</table>
Where has employment growth taken place?

2.30 The following table shows how B class employment development has been distributed throughout the district since 2000.

<table>
<thead>
<tr>
<th>Employment location</th>
<th>Area developed</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Key Employment site at Barlborough Links</td>
<td>33.04</td>
<td>25%</td>
</tr>
<tr>
<td>Key Employment site at Castlewood, South Normanton</td>
<td>23.70</td>
<td>17.9%</td>
</tr>
<tr>
<td>Key Employment site at Brook Park, Shirebrook</td>
<td>21.39</td>
<td>16.2%</td>
</tr>
<tr>
<td>All other industrial estates combined</td>
<td>44.16</td>
<td>33.8%</td>
</tr>
<tr>
<td>Other locations e.g. town centres / Countryside locations</td>
<td>9.25</td>
<td>7%</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td><strong>131.54</strong></td>
<td><strong>99.9%</strong></td>
</tr>
</tbody>
</table>

Table 10 shows that three key Employment Sites have together contributed 59% of employment land developed since 1999/2000. All three key employment sites have characteristics that have made them attractive to developers. Both Castlewood and Barlborough Links are very close to the M1 Motorway. Brook Park has good accessibility to the A1 and reasonable access to the M1. All three sites have benefited from having considerable investment where road infrastructure was put in place and development plateaux created. The sites were therefore readily available for development.

2.31 Much of the other development (33.8%) in the District has taken place on available plots within already established industrial estates such as High View Road, Berristow Lane, and Clover Nook South Normanton, Sawpitt Lane, Tibshelf, Southfield Lane, Whitwell, Morven Street and Colliery Road, Creswell and Brookhill Industrial Estate, Pinxton.

2.32 The table below shows that as of 2015 there was approximately 25 ha of land remaining at the three key employment sites. Most of this land has planning permission (15.08 ha with Detailed Planning permission and 10.67 ha with outline planning permission) and approximately 9.81 ha of which is under construction.

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9 Key Employment Site is the term used to describe these sites in the adopted local plan (2000).
Table 11: Employment land situation at Key Employment Sites

<table>
<thead>
<tr>
<th>Key Employment Site</th>
<th>Original Development Area</th>
<th>Area remaining @ 2015</th>
<th>With Planning Permission @ 2015</th>
<th>Under Construction @ 2015</th>
</tr>
</thead>
<tbody>
<tr>
<td>Barlborough Links</td>
<td>36.14</td>
<td>3.1</td>
<td>3.1</td>
<td>-</td>
</tr>
<tr>
<td>Castlewood</td>
<td>34.37</td>
<td>10.67</td>
<td>10.67</td>
<td>-</td>
</tr>
<tr>
<td>Brook Park, Shirebrook</td>
<td>34.47</td>
<td>13.08</td>
<td>12.08</td>
<td>9.81 ha</td>
</tr>
<tr>
<td>Total</td>
<td>104.98</td>
<td>26.85</td>
<td>25.85</td>
<td>9.81 ha</td>
</tr>
</tbody>
</table>

2.34 Despite having a healthy supply of planning permissions in 2015, the Council did not have one ‘ready to develop’ 30 ha Business Park, let alone three, which it could rely on to deliver employment growth throughout the plan period. The three key Employment sites shown in the Adopted Local Plan (2000) actually came forward at different times since 2000. Barlborough Links had begun to be developed prior to 2000; development on Brook Park didn’t start until 2004/2005; and despite a series of planning permissions at Castlewood, development didn’t take place until 2013/2014 following a planning permission granted in 2006.

2.35 It is likely that these sites will be built out in the early years of the new plan period. It is considered very unlikely that the Council could continue to deliver past levels of growth without the availability of ready-to-go, purpose built, business parks, with readily available plots and good access to the strategic highway network, that have previously been available.

2.36 In the 3 years since the EDNA was published, 22.30 hectares has been completed with an average build rate of 7.76, slightly above past trends. However, 18.30 ha of the land developed (82%) have again been the continued build out of the three key employment sites.

Table 12: Employment Land developed since 2015

<table>
<thead>
<tr>
<th>Year</th>
<th>B1</th>
<th>B2</th>
<th>B8</th>
</tr>
</thead>
<tbody>
<tr>
<td>2017 – 2018</td>
<td>0</td>
<td>0</td>
<td>3.74</td>
</tr>
<tr>
<td>2016 – 2017</td>
<td>0</td>
<td>0</td>
<td>8.58</td>
</tr>
<tr>
<td>2015 – 2016</td>
<td>0</td>
<td>0</td>
<td>10.98</td>
</tr>
</tbody>
</table>

2.37 In July 2018, with only 5 ha remaining at the three key employment sites, considering that large / key employment sites take a long time to build out, and also that new large site allocations such as Clowne Garden Village, and Wincobank Farm are not yet ‘shovel ready’, it is still reasonable to assume that past trends will continue at a lower rate.
2.38 Overall, the EDNA\textsuperscript{10} considers that there are limitations to planning based on past take up rates. It cannot be automatically assumed that past trends will be replicated over the plan period especially in changed circumstances. The Council agrees with this position.

Scenario 4: Labour Supply Scenario

2.39 A labour supply scenario, underpinned by demographic modelling produced by GL Hearn informed the Council’s Strategic Housing Market Assessment (SHMA), has also been considered in the EDNA. These projections estimate that Bolsover’s total population will increase from 77,650 in 2015 to 84,566 in 2033. As a result, the number of economically active residents is projected to rise from 35,835 to 38,900 over the same period. This change in economically active residents has been used in the EDNA to estimate the level of employment space that this population change could be expected to support.

2.40 The EDNA also assumes that the 2011-based commuting relationships are maintained over the study period and that Bolsover continues to be a net exporter of labour\textsuperscript{11}. This approach reflects the most recent population projection work commissioned by the Council and provides a purely demographic driven assessment of future labour supply. The future land requirements under this method are as follows.

<table>
<thead>
<tr>
<th>Table 13: Land Requirements for the B Class uses based on Labour Supply</th>
</tr>
</thead>
<tbody>
<tr>
<td>B class Sector</td>
</tr>
<tr>
<td>Offices (B1 a + b)</td>
</tr>
<tr>
<td>Manufacturing (B2 and B1 c.)</td>
</tr>
<tr>
<td>Warehousing (B8)</td>
</tr>
<tr>
<td>Total</td>
</tr>
</tbody>
</table>

2.41 The table shows that the space requirements are considerably lower than the other scenarios, with a total of just 23.3 hectares. The main concern with this method is that it assumes that jobs in the District will only be taken up by residents of the district. Yet, in reality there are large numbers of in-commuters, as proved in both the 2001 and 2011 censuses. In 2001, the census recorded that 48.1% of people working in Bolsover District travelled in from outside the District. In 2011, the census recorded that this percentage had increased to 63.3% of people working in Bolsover District travelled in from outside the District.

\textsuperscript{10} EDNA (2015) Paragraph 9.90

\textsuperscript{11} On the basis that approximately 20,000 residents travel outside the district to work and 16,000 travel from outside to work in the district. (Census 2011).
2.42 It is highly unrealistic to assume that during the plan period, further in-commuting will abruptly cease, and jobs will only be provided for new economically active residents, and it would be highly inappropriate for the Council to base its future land requirements solely on this method. However, it is important that an employment land target is not set lower than this so that it would not even make sufficient provision for the District’s new economically active residents.

2.43 It should also be noted that the total land requirements are well below the amount of land that had planning permission as of 2015 which was 79.74 ha.

**The Needs of the Business Community**

2.44 As mentioned earlier, the PPG expects the needs of the business community to be considered as part of the plan making process.

2.45 Chapter 7 of the EDNA explains how understanding business needs has been taken into account in the study through discussions with commercial property agents, telephone interviews with key business and economic forums, a survey of business needs and a stakeholder workshop.

2.46 A survey of local businesses was undertaken during May and June 2015. The survey was sent to 120 business contacts located in Bolsover District. Further prompts to businesses were subsequently sent out – and the deadline for responses extended – in a bid to maximise the response rate achieved.

2.47 Unfortunately, despite the best efforts of the Council and NLP, the response to the survey was disappointing, with just 21 (17.5%) completed surveys submitted. This clearly limits the extent to which meaningful conclusions can be drawn from any analysis of the results. However, it is important to note that this EDNA does not rely solely upon the survey data to understand business needs. Rather, it draws upon intelligence gathered through a range of additional consultation approaches (including interviews and workshops with commercial agents and business and economic forums).

2.48 The survey data indicates that 12 of the 21 participants expect their business to expand over the next few years, resulting in a need for additional land or floorspace. Expanding businesses represented a range of industries, including general manufacturing, construction, hospitality & tourism, warehousing, logistics / distribution / property management and financial & professional services.

2.49 Based upon an analysis of the survey responses, the growth of these 12 firms could be expected to create demand for approximately 22,250sqm of floor space, although 6 of 12 the firms indicated that they have sufficient expansion
land to accommodate this growth on or adjacent to their existing site. The land requirements for the firms that could not accommodate their needs was not reported in the study but is unlikely to be significant.

2.50 Overall it can be concluded that the results of this method depend upon the degree to which the business community want to engage with the Council which for this study was low. Such information is of course commercially sensitive and businesses can be understandably unforthcoming with information. Although this source of information is important, it must be treated with caution given the sensitivities surrounding it and it was considered insufficient to inform an employment target by itself.

Conclusion – Towards a target

2.51 The EDNA concludes by saying that Local Authorities should avoid relying upon a single projection or forecasting technique, and as explained earlier, there are inevitable uncertainties and limitations associated with all of the techniques advocated by the PPG when applied in isolation.

2.52 Overall the EDNA recommends that the Council should plan for an employment target mid-way between 65 to 100 hectares over an 18 year period from 2015 – 2033.

Offices

2.53 Breaking this down into sectors, the EDNA recommends that 10 ha should be allocated for B1 offices. This reflects a mid-range figure of the respective scenarios for offices, closely resembling that forecast by the Ekosgen (Flute) modelling for the Sheffield City Region, and taking into account local economic market intelligence that advises that, generally speaking, the district is not an attractive location for offices. The EDNA advises against following past take up rates which would put the figure at 19.8 ha.

Manufacturing

2.54 The EDNA also recommends that 20 hectares should be allocated for manufacturing, and that this figure represents the mid-point between the Ekosgen scenario and the past take up rate scenario.

Storage and Distribution

2.55 The EDNA recommends that a range of between 35 hectares and 70 hectares for storage and distribution uses should be considered. 35

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12 Paragraph 9.88
hectares is considered to be a starting point for indigenous demand. 70 hectares is considered appropriate to meet both indigenous demand and also provide a sufficient level of flexibility to accommodate at least two large logistics developments.

2.56 In total, therefore for just B class uses, the Council has a range to consider between 65 and 100 hectares. The EDNA considers that if the Council want to attract more large retail based logistics developments, it should consider a target towards the higher end of the range.
3) Local Plan for Bolsover District

3.1 At their meeting on 27th July 2014, members of the Local Plan Steering Group resolved to prepare a new single Local Plan for Bolsover District. This is a single plan both in terms of content - containing strategic and development management policies; and in terms of covering a single district.

Development of the Local Plan Employment Target

Initial Consultation

3.2 The initial public consultation on the new Local Plan for Bolsover District took place between 20th October 2014 and 28th November 2014. This stage of consultation was to gather information from stakeholders and residents on what the new Local Plan for the District ought to contain. Feedback from this consultation was used to inform the next stage of consultation. A strategic site for employment was submitted at Coalite and a mixed use Strategic site was submitted at Clowne Garden Village (then known as Clowne North) including 20 hectares of employment land. The supply of employment land was suggested as a policy area.

Consultation on Identified Strategic Options

3.3 This public consultation took place between 30th October 2015 – 11th December 2015. The consultation focussed on a range of options for the quantum of development in the District; its distribution; and, strategic sites. The employment target options put forward for consultation were:

- Option 1 – An employment target of 65 ha below the then current supply of planning permissions;
- Option 2 – An employment target of 80 ha, at approximately the current level of planning permissions;
- Option 3 – An employment target of 100 ha above the current range of permissions and predicated on the inclusion of two large logistics sites.

3.4 In February 2016, based on a consideration of all of the issues in relation to selecting a preferred employment target, the Council decided to approve a high target of between 80 and 100 ha, a combination of Options 2 & 3 to inform the next stage in the development of the Local Plan. The main reasons for this were that:

a) A high target would best achieve the local plan vision and two of the local plan objectives;
b) At this stage, without knowing which sites the Council will select, the Sustainability Appraisal did not raise any major concerns with any of the target options;
c) In terms of the tests of soundness, the Council’s evidence, the Economic Development Needs Assessment (2015) has followed National Planning Practice Guidance and recommends a need for between 65 and 100
hectares of employment land. Therefore a target at the higher end of this range would be ‘justified’, and also be ‘positively prepared’ and ‘consistent with national policy’ that wants to encourage a strong and competitive economy; and would also be in accordance with the Council’s growth agenda;

d) The feedback from consultation showed that overall the middle target option received most support, 25, and least objections, 3. The higher target Option received the next highest number of supports 13, along with 7 objections. The lowest target option received 9 supports and 8 objections.

3.5 Therefore, at this time, the Council already had 75 hectares with planning permission. So, early on in the plan period, the Council’s supply was already 75% of the way towards the higher target. However, further work was required to ascertain which sites the Council could include within its deliverable supply. Uncertainties existed over the deliverability of Coalite, Clowne North, Wincobank Farm and many smaller allocations within the Adopted Local Plan (2000). Therefore only when greater certainty existed over the deliverability of these sites, can the Council have greater certainty about the precise level of the higher target.

Consultation Draft Local Plan

3.6 Consultation on this Plan took place between 31st October 2016 and 12th December 2016. The document proposed an Employment target of 99 ha over the life of the Local Plan, and also set out the proposed employment allocations to deliver this target over the Plan period.

3.7 In terms of responses to the policies on the then proposed employment target of 99 ha, one objector considered the target too low and it should be over 100 ha; another objector felt that Bolsover Town should have more employment land. There were objections to site allocations at Clowne North and Land South of Farmwell Road, South Normanton.

Requests to meet the Employment Needs of other Authorities

3.8 No formal requests were made during the preparation of the Local Plan asking if the Council could meet possible unmet employment land needs from other authorities.
4) Delivering Employment Need

4.1 At July 2018, the Council had 60.12 ha of B1, B2 and B8 land with planning permission. The Council had decided to allocate the following sites with planning permission, totalling 26.62 ha or 29% of the total land allocated.

- Erin Road, (central plot) Seymour (Markham Vale) – 4.4 ha
- Erin Road, (southern plot) Seymour (Markham Vale) – 2.7 ha
- Explore Industrial Park, Explore Way (off A619), Steetley. – 10.70 ha
- Land West of Farmwell Lane, Castlewood, South Normanton – 3.13 ha
- Land between Brickyard Farm and Barlborough Links – 3.45 ha
- Land off High Hazels Road, Barlborough – 1.17 ha
- Land off Weighbridge Road, Brook Park – 1.07.

4.2 It should be noted that in July 2018, the Council resolved to grant outline planning permission for the Clowne Garden Village site, (which includes 20 ha of B1-B8 employment land) subject to the agreement of S.106 contributions and conditions. Once the permission is issued, it would bring the total up to 46.62 ha or 50.9% of total land allocated with planning permission to go alongside the 25.3% already developed leaving 23.7% without planning permission currently.

4.3 The Council chose not to allocate the following sites with planning permission as employment allocations.

- The former Coalite site, Bolsover, (31 ha) has not been allocated due to uncertainties over the timescales for the decontamination of the whole site;
- Former Blackwell Tip\(^{13}\), South Normanton, (2.5 ha). Despite having a temporary planning permission this site is not allocated due to deliverability concerns related to the proposed HS2 line passing through the site and affecting a substantial part of the site’s area.

4.4 It should be noted that, in accordance with the NPPF\(^{14}\) the Council has allocated the Coalite site as a Priority Regeneration Area, and while it hopes to see the site come forward for B class employment during the plan period, is not reliant on it coming forward to meet its Employment Objectively Assessed Need. The NPPF\(^{15}\) says that policies should be flexible enough to accommodate needs not anticipated in the plan and to

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\(^{13}\) [https://planning.bolsover.gov.uk/online-applications/applicationDetails.do?activeTab=summary&keyVal=N44CC7DD06X00](https://planning.bolsover.gov.uk/online-applications/applicationDetails.do?activeTab=summary&keyVal=N44CC7DD06X00)


\(^{15}\) NPPF Paragraph 21 Bullet point 3
allow for a rapid response to changes in economic circumstances. In developing the Plan, the Council did not consider that delivery of the site could be guaranteed. Despite some problems still remaining, there has been significant progress with the site, such that the site promoters expect the site to start delivery in 2019. If that occurs, the additional flexibility that this will add to the Plan would be welcomed.

4.5 As explained earlier, a high employment target including up to 70 ha of storage and distribution development would be dependent on the ability to accommodate at least two large logistics developments up to an area of 35 ha. The Council has identified two such sites.

- Land at Brook Park, Shirebrook – 13 ha already developed.
- Wincobank Farm, South Normanton – 14 ha

**Land at Brook Park, Shirebrook**

4.6 This site, developed in 2016, and shown on the site plan below includes the second of two large warehouses (Unit C) for Sports Direct.

4.7 The warehouse includes 99,000 m² of floorspace including mezzanine floors and office areas. Staff car parking, is spread over two car park areas. 516 spaces on a parcel of land west of Unit C3 and another car
park alongside the Retail unit with another 379 spaces. The warehouse employs approximately 2000 staff. The distribution centre is used as a core distribution base for retailers owned by Sports Direct such as Van Mildert, Flannels, Republic, Heatons and Firetrap. The retail unit, to the north-west sells items stored in the warehouse.

Wincobank Farm

4.8 This is a 14 ha greenfield site located within 5 minutes of Junction 28 of the M1, within an area heavily characterised by large employment units. Despite a recent planning application for a retail park with employment land to the north, that has recently been withdrawn, the site is not currently promoted for a large single user. However, the Council considers that because of its attractive location the site will come forward during the plan period.

4.8 It should be noted that these two sites total 27 ha between them and the land area estimated in the EDNA for two such large sites totals 35 hectares. Between them these sites are 8 ha short of this target which coincides with the Council’s target being 92 out of 100 – also 8 ha short. However, the sites allocated approximately meet the needs identified and the discrepancy in land areas are minor overall and could not be met by simply allocating an additional 8 ha elsewhere.
Evidence of deliverability

4.9 In order to meet the ‘effective’ soundness test the plan must be deliverable over its period. However, it would be unrealistic to expect that all site allocations would have planning permission and be under construction at the time of adoption. It is reasonable to assume that some sites will come forward in the first half of the plan period and other sites in the latter half of the plan period.

4.10 It is worth reiterating that 23.35 ha, 25% of the employment land target has already been delivered.

4.11 The following sites have planning permission, there is developer interest, and the Council has full confidence that they will come forward in the first half of the plan period for the following reasons.

Erin Road, (southern plot) Seymour (Markham Vale) – 2.7 ha

4.12 This site forms part of the successful 120 ha Markham Vale Strategic Employment Site that includes land in Chesterfield Borough, and North East Derbyshire District. This site has approval of reserved matters for a general industrial unit with related storage and distribution warehouse with ancillary offices plus associated works and structures. The B2 element of the proposal is for the sterilising of medical products through the use of Gama sterilisation technology. The developer, Henry Boot has a good track record of developing units at Markham Vale. This site is likely to come forward within the first 5 years of the plan period.
Explore Industrial Park, Explore Way (off A6190, Steetley – 10.70 ha

4.13 A cross boundary site within both Bassetlaw and Bolsover District Councils. The site has an Outline planning permission granted in 2010 that allows the submission of reserved matters by 2020. The site benefits from a new roundabout and a new road through the site from which development platforms can be accessed. The planning permission restricts the use of the site to uses related to the manufacturing hub concept that benefits from the efficiency and sustainability gains from sharing resources on a single site. The site remains readily available for development in association with this use. A recent planning permission for a B2 unit, albeit on the Bassetlaw side, confirms Laing O’Rourke’s intention to continue to invest in the site.

Land between Brickyard Farm and Barlborough Links – 3.45 ha

4.14 There is now very strong developer interest from leading companies Laing O’Rourke and Eddie Stobart for flagship offices and a maintenance facility. They consider the site to be the right size, close to local towns to recruit staff from and ideally situated near a motorway junction (Junction 30). A reserved matters application was approved in August 2018. The site is likely to come forward within the first 5 years of the plan period.
Land West of Farmwell Lane, Castlewood, South Normanton – 3.13 ha

With outline planning permission, this ready to develop plot is the last remaining plot within Bolsover District of the Castlewood Business Park. The site is marketed by developer Clowes Developments.
Clowne Garden Village – 20 ha

4.16 The site has the benefit of a Council resolution to grant outline planning permission subject to the signing off of conditions and S.106 contributions. The site is being promoted by Waystone, a construction and development firm who specialise in large employment sites and who have successfully brought forward the nearby 45 ha Barlborough Links Business Park over a twenty year period. The following information taken from the Clowne Garden Village Phasing Plan shows 17 ha of employment plateaux is planned to come forward between 2021 and 2027 and once plateaux are created the letting of plots will commence.
Land off High Hazels Road, Barlborough – 1.17 ha

4.17 Centrally located within the very successful Barlborough Links business park, this site has planning permission for a two storey office building with integral vehicle maintenance/MOT bays and storage, however, despite an access into the site being created by the applicant, alternative existing premises have recently been found to suit the applicant’s business. It is expected that the site will come forward in the first half of the plan period and the recently constructed access into the site will help this to happen.

Land off Weighbridge Road, Brook Park – 1.07 ha

4.18 This site has a temporary permission for storage of containers. The site occupies a central position in the successful Brook Park development dominated by large units occupied by Sports Direct, but also adjacent to a successful development of incubation units. In July, a planning application was received for an Energy generation unit that would occupy 0.37 ha of the site, which if granted and developed would leave 0.7 ha.
Erin Road, (central plot) Seymour (Markham Vale) – 4.4 ha

4.19 While the site has outline planning permission, an application to vary conditions in 2016 – indicating a desire to progress the site - was approved. A development plateaux exists and the site is part of the very successful Markham Vale development which has a strong track record of delivery. The EDNA\textsuperscript{16} assessed the site as follows “once the link road is place, the site offers great potential for B1, B2 and B8 development. In summary, this is a good employment site when considered against assessment criteria”. The Council expects the site to come forward within the first 5 years of the plan period.

\textsuperscript{16} EDNA Paragraph 6.33
4.20 The following sites, totalling 21.59 ha or 23% of the total are all currently without the benefit of planning permission, however the Council remains confident that there are very good reasons why the sites will come forward in the latter half of the plan period at the very latest.

Wincobank Farm – 14 ha

4.21 Very attractive location (close to Junction 28 of the M1) as evidenced by the mass of employment development around it (site plan shown earlier). The site could be made available for one large unit. Until only recently, June 2018, there was developer interest through a planning application for delivering B class employment uses on the northern half of the site. The EDNA\textsuperscript{17} assessed the site as follows—“the site is viewed as having adequate access to labour and is well suited for B8 development. In overall terms this site achieved an average score in this assessment.”

Land south of Maisie’s Way – 1.05 ha

4.22 A small site in a very accessible location close to Junction 28 that represents a natural continuation and the third phase of an estate of prestigious two storey offices built by developer Sladen Estates, since 2010 totalling 116,000 ft\textsuperscript{2}. Occupiers on Phases one and two include Tarmac, The Schools Advisory Service, and the Pub People. The EDNA\textsuperscript{18} assessed the site as follows—“its prominent position next to the A38 implies that office development here is likely to remain a viable option under more favourable market conditions. In summary, this is a good employment site when considered against assessment criteria.”

\textsuperscript{17} EDNA Paragraph 6.37
\textsuperscript{18} EDNA Paragraph 6.20
Colliery Road, Creswell – 0.46 ha

4.23 A small allocation suitable for small business workshops adjacent to an existing small estate of workshops already along Colliery Road. At July 2018, this site forms a small part of a planning applications\textsuperscript{19} for a much wider area including other uses. Whilst there is no developer interest at present there is at least interest in establishing a planning permission from which developer interest can become more active.

![Colliery Road, Creswell](image)

Park View (South), Whaley Thorns – 0.58 ha

4.24 This site represents the continuation of a small estate of employment uses. The landowner reports developer interest from a local firm in a countryside location. The EDNA\textsuperscript{20} assess the site as follows – “it appears to offer reasonable potential to provide further high calibre office accommodation and/or light industrial units. In overall terms it achieved an average score in this assessment”.

\textsuperscript{19} https://planning.bolsover.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=P43LWRDDHV0K00

\textsuperscript{20} EDNA Paragraph 6.22
Former Whitwell Colliery Strategic Site – 5.5 ha

4.25 This 5.5 ha former colliery land site forms part of a much larger strategic allocation including residential, and a country park. Subject to planning permission being granted by 2019, Welbeck estates build out programme shows 2 ha of employment development to come forward in 2024, and a further 2 ha to come forward in 2029.
5) Losses of Employment Land

5.1 The EDNA includes an allowance within the prescribed Employment land target of between 65 and 100 ha to compensate for the potential loss of B class employment land over the plan period, where it states 21 “Losses over the period 1999/2000 to 2014/15 have averaged approximately 0.96ha per annum. This corresponds to approximately 3,858sq.m of floor-space (on the basis of a plot ratio of 0.4). Including an allowance for the replacement of losses at 50% of past rates therefore equates to some 1,929sq.m per annum over the Plan period. The resultant gross floor-space requirements incorporating this allowance (disaggregated by use class) are set out in Table 9.12 and Figure 9.3.”

5.2 Although the study does not state this fact specifically 1,929 m² equates to 0.19 ha which when multiplied by 18 years equals 3.42 ha, which is the assumed figure added to the Employment target range to allow for losses over the plan period.

Protection of Employment Land

5.3 To guard against future losses Policy WC2 of the Publication Local Plan, protects land and buildings within 27 Industrial Estates and Business Parks, including some of the smaller estates suitable for small businesses. Employment land and buildings outside of these estates, are not protected. So for example, small employment uses within predominantly residential areas will not receive policy protection from changes of use.

5.4 In the last three monitoring years since the EDNA was published the following amounts of B class employment land were lost to other uses.

<table>
<thead>
<tr>
<th>Table 14: Lost employment land</th>
</tr>
</thead>
<tbody>
<tr>
<td>Monitoring Year</td>
</tr>
<tr>
<td>-----------------</td>
</tr>
<tr>
<td>2017/2018</td>
</tr>
<tr>
<td>2016/2017</td>
</tr>
<tr>
<td>2015/2016</td>
</tr>
</tbody>
</table>

5.5 So far in the plan period the average amount of B class employment land lost per year has been much less than the 0.19 ha per annum average allowed for. In the next monitoring year 2018/2019, it is highly likely that the redevelopment of a former Textiles factory as a residential site will be complete, and would therefore add a loss of 1.4 ha to the totals.

5.6 Paragraph 22 of the NPPF that says “Planning Policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose”. The

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21 EDNA Paragraph 9.68
Council has deallocated 11 sites allocated or shown to have planning permission in the Adopted Local Plan (2000). These sites were not considered to be deliverable – mainly because the landowners either did not make them available, or wanted to make them available for other uses.

5.7 The following de-allocated employment sites are now outside development envelopes.

- Land North of Bolsover Business Park, Bolsover – 1.65 ha
- Park View North, Whaley Thorns – 1.09 ha
- Mansfield Road, Hillstown, Bolsover – 1.12 ha
- Colliery Road, Creswell (Part) – 0.73 ha
- Creswell Colliery South – 1.57 ha

5.8 The following sites are small parcels within established Industrial Estates, and could still come forward for B class employment use, however, the Council cannot point to any evidence that they will in order to support an allocation for B class uses. Also because of their location within Industrial estates they are unsuitable for residential use. They may in some circumstances be suitable for other forms of Non B Class employment uses, but not retail.

- Portland Drive / Vernon Street, Shirebrook – 4.5 ha
- Riverside Way, Bolsover – 1.25 ha
- Land at Carter Lane East, South Normanton – 0.82 ha
- Pitt Lane, Pleasley – 0.8 ha

Sawpitt Lane Industrial Estate

5.9 The proposed route of HS2 and its safeguarding zone goes through the western half of the Saw Pitt Lane Industrial Estate, near Tibshelf as shown on the Publication Local Plan Policies Map and in the plan below.
5.10 The potential loss of the western half, approximately 6.4 ha out of a total area of 11.6 ha is taken account of in the Employment Land Target but crucially, not in the form of a like for like land area replacement but it has been taken into account in more general terms, as the EDNA\textsuperscript{22} states

"It should be noted that the forecast requirements for employment land modelled in Section 9.0 of this document do not include any specific allowance for the provision of land to offset the potential closure of Sawpit Lane. However, the issue has – in more general terms – influenced the process of reconciling the range of requirements implied by the various modelled scenarios in order to identify a preferred requirement for the District over the period to 2033 (paragraph 9.88 onwards)."

\textsuperscript{22} EDNA Paragraph 7.41
6) Site Selection Methodology

6.1 In line with the PPG advice on ‘Housing and Economic Land Availability Assessment’, the Council developed a joint methodology with neighbouring authorities in the HMA to undertake land availability assessments. This assessment formed the basis of the Council’s Employment land allocations. Essentially, sites that were not considered to be ‘deliverable’ meaning Available, Suitable and Achievable could not be considered for allocation.

6.2 Due to a lack of deliverable alternatives, the combined site area of the sites that passed the assessment enabled the Council to select its allocations at a level of employment land that fell within its desired target range, including two large sites. The sites that passed the LA assessment therefore ‘picked themselves.’ as allocations within the plan.

6.3 To inform the selection of these sites, all proposed plan allocations and reasonable alternatives have been subject to Sustainability Appraisal using tailored appraisal criteria and associated thresholds of significance. Paragraphs (5.5.20 – 5.5.24) from The Sustainability Appraisal Report describes in more detail the outcome of how the employment sites were appraised. The appraisal of the reasonable alternative employment sites can be found Appendix G to the Sustainability Appraisal Report.
7) Functional Economic Market Area

7.1 The PPG states that economic development needs should be assessed working with other local authorities in the relevant Functional Economic Market Area.

7.2 The EDNA identified the FEMA in which Bolsover District functions, where it explains23 “Strong commuting flows out of (and to a lesser extent into) the District provide a key reference point for understanding its FEMA. Almost 70% of Bolsover’s working residents travel outside of the District for employment, giving rise to a self-containment rate of approximately 30% and indicating that Bolsover’s FEMA extends beyond its own borders. The neighbouring authorities of Chesterfield, Ashfield, Amber Valley, Mansfield and North East Derbyshire present the origin and destination of the majority of commuting flows into/out of the District. Based upon the ONS methodology for defining labour market areas, Bolsover’s FEMA comprises the six local authority areas of: Chesterfield; North East Derbyshire; Amber Valley; Bassetlaw, Mansfield and Ashfield. Taken together the six authorities (plus Bolsover) comprise the workplace for 80% of Bolsover’s resident working population and the residence for 76% of Bolsover’s workers.”

7.3 According to the PPG therefore Bolsover District should be assessing its employment development needs working with Chesterfield Borough Council, North East Derbyshire District Council, Ashfield District Council, Amber Valley Borough Council, Mansfield District Council and Bassetlaw District Council.

7.4 The reason why there is no Employment Needs Assessment Study covering Bolsover’s FEMA is due to the fact that each of those individually named authorities has its own FEMA that includes a different set of authorities all of which may or may not include Bolsover. For example, North East Derbyshire District Council’s identified FEMA also includes Chesterfield Borough Council and Sheffield Unitary Authority; and Bassetlaw District Council considers itself part of the FEMA identified by the Sheffield City Region.

7.5 The inter-relationship between each district’s FEMA is very complicated and could result in a local authority being covered by more than one FEMA, and therefore more than one assessment study, and having a different employment land need identified in each.

7.6 On the basis that adjoining local authorities would not wish to partake in an assessment study centred on Bolsover’s FEMA, because they had already developed their own evidence base or that they considered

23 EDNA Paragraphs 12.6 – 12.9
themselves within a different FEMA, planning for development needs across Bolsover’s identified FEMA, was not possible.

7.7 None of the local authorities identified within Bolsover’s FEMA objected to the levels of employment land or the sites allocated within the Consultation Draft Local Plan (2016). Rotherham Unitary Authority also an adjoining authority to Bolsover, but not in the FEMA, also had no objections.
8) Conclusions

8.1 This paper sets out the Council’s position in relation to the provision of B class employment land.

8.2 In relation to the tests of soundness and the Council’s employment provision, the Local Plan for Bolsover District has been prepared under the policy framework provided by the first NPPF published in March 2012.

8.3 Whilst the new NPPF was published on 24th July 2018, paragraph 214 of the new NPPF states that “The policies in the previous Framework will apply for the purpose of examining plans, where those plans are submitted on or before 24 January 2019.” Based on the Local Plan for Bolsover District being submitted in August 2018, it is clear from the wording of the new NPPF that the relevant tests of soundness are those within the first NPPF published in March 2012.

8.4 In light of this, it is the Council’s contention that the proposal meets all of the relevant tests set out in the first NPPF published in March 2012 as explained below.

Positively Prepared

8.5 The Publication Local Plan allocates 92 hectares of employment land. This is towards the very top end of the needs identified in the EDNA of between 65 and 100 ha, and the Council’s own target of between 80 – 100 ha.

8.6 On this basis, the Council is clear that its approach to its employment policies meets the ‘positively prepared’ soundness test (first NPPF, paragraph 182 bullet 1) and has seen no convincing arguments to the contrary.

Justified

8.7 The Council considers that the EDNA, referred to throughout this paper, provides evidence in proportion to the subject matter. The Council considers that its approach to the provision of employment land is the most appropriate against the reasonable alternatives as evidenced in the sustainability appraisal.

8.8 On this basis, the Council is clear that its approach to the provision of employment land meets the ‘justified’ soundness test (first NPPF, paragraph 182 bullet 2) and has seen no convincing arguments to the contrary.

Effective

8.9 The paper has shown that employment land allocations are deliverable over the plan period, indeed 25% of the target has already been delivered. The Council can demonstrate joint working on employment cross boundary strategic priorities. This is evidenced in the Duty to Co-operate Statement.
8.10 On this basis, the Council is clear that its approach to the delivery of Employment meets the 'effective' soundness test (first NPPF, paragraph 182 bullet 3) and has seen no convincing arguments to the contrary.

**Consistent with National Policy**

8.11 This Plan and this paper has referred to the NPPF throughout and has demonstrated that the approach taken is clearly consistent with National Policy and enables the delivery of sustainable development.

**Comment on the soundness tests within the new NPPF**

8.12 Whilst it is clear from the wording of the new NPPF that the relevant tests of soundness are those within the first NPPF published in March 2012, it is considered helpful in the interests of completeness to provide some comment on the soundness tests within the new NPPF as set out in paragraph 35.

8.13 From a comparison between the first and new NPPF, it is considered that the main variations in relation to each test of soundness are as follows.

a) **Positively Prepared**

The test now makes it clear that meeting the area’s objectively assessed needs is a minimum requirement, and that this work should be informed by other authorities. Compared to the 65 – 100 ha parameter, and indeed the Council’s preferred target range of 80 – 100, the 92 ha allocated is clearly at the higher end of the objectively assessed need the Duty to Cooperate statement sets out the cross boundary work that has taken place.

b) **Justified**

The main change here is that under the new NPPF a Council must identify ‘an appropriate’ strategy rather than being tested on the basis that it must be ‘the most appropriate’ strategy. Also, under the new test a Council needs to only ‘take into account’ the reasonable alternatives, rather than ‘consider the strategy against’ the reasonable alternatives. The amendments seem to make the test more reasonable and in meeting the test within the first NPPF as set out above, the Council clearly meets this test.

c) **Effective**

The main issue here is the requirement to deal with and not simply defer cross boundary strategic issues. None of the strategic issues identified have been deferred with all authorities working together and accepting each other’s approaches to development.
d) Consistent with national policy

Whilst wording has been slightly amended, there is no material change to this test which remains passed as set out above.

OVERALL CONCLUSION

8.14 To conclude, the Council having carried out all the relevant assessments and taken into account representations made for and against its position in relation to Employment Provision within its Local Plan, the Council is clear that its Local Plan meets the tests of soundness for the reasons set out above.

8.15 The Council trusts that this Position Paper will aid the Planning Inspector’s examination of both the Council’s Local Plan for Bolsover District and the issues raised in relation to its Employment Provision position.
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