Policy 9 – Retention of good quality existing employment sites:

ID	Organisation
Duty to Co-operate / Interest Groups	
73 and 2316	Stapleford Town Council (Supported by Councillor Richard MacRae)
Developer / Landowner	
2607	Harworth Group (Represented by Pegasus Group)
Individual / Local Resident	
720	Pearson

Stapleford Town Council

[redacted]

Mr S Saunders
Planning Policy
Broxtowe Borough Council
Foster Ave.
Beeston
NG9 1AB

2nd November 2017

Dear Mr. Saunders,

Broxtowe Local Plan Part 2

Please find attached the comments regarding the Broxtowe Local Plan Part 2, as discussed by Stapleford Town Council at its Meeting held on 13th October 2017.

There was full and frank discussion of this document and I have set out a full minute reference as instructed by the Town Council and this is the formal comment of the Town Council on this matter.

Further, I have been instructed to inform you that Stapleford Town Council would wish to be invited to the Public Examination of the Broxtowe Local Plan Part 2 and would reserve the right to speak to its comments.

I am also forwarding these comments by email.

Yours sincerely

[redacted]

Town Clerk
Stapleford Town Council

Broxtowe Borough Council
Planning & Community Development
- 3 NOV 2017

Minute Reference Stapleford Town Council Meeting held on 23rd October 2017

83/2018 Update: Broxtowe Borough Council Local Plan

Member's considered the proposals made in the Broxtowe Borough Council Local Plan Part 2 consultation documents and following full and frank discussion the following points were noted for forwarding to Broxtowe Borough Council as the Town Council's formal comments on this Document.

1. Councillor Pearson was disquieted by a number of statements contained within the Broxtowe Borough Council Local Plan Part II and considered a number of the statements made to be erroneous and lacking in evidence and the Meeting concurred with his comments.

2. Attention was drawn to comments made on page 12 of the document re 'Employment where it was stated that 'Broxtowe was a thriving and vibrant place with access to services jobs and opportunities for all.' The Meeting saw no evidence for this statement. Likewise, the comments relating to 'Community Safety' where Members were concerned there was no evidence to justify this statement or proposals of how the aspirations would be achieved.

3. On page 14 of the document where land in vicinity of HS2 was recognised the Meeting felt that there was a need for further information on proposals for this expansion in the Main Built Up Area. Not enough attention was being paid to the opportunities that would arise with the development of HS2 and associated projects.

4. Page 15 of the document continued to address the Spatial Objective and point v) discussed residential redevelopment of two areas within Beeston and then mentioned that 'Growth is also provided for at Eastwood and Stapleford...' However, at no point does it explain where this 'Growth' will be accommodated or how these aspirations will be achieved.

5. Further there seems to be a lack of clarity as to what is meant by 'regeneration' in point v) (see above) and while residential development was mentioned there was a paucity of detail regarding the provision of designated land for employment purposes, which would be an essential part of any regeneration strategy.

6. With regard to 'Health and well-being', page 16 point viii) this was an area that concerned the Town Council as there appeared to be an absence of proposals to achieve the improved health and well-being of the Town's residents or make any positive suggestions for the development of new community facilities within the Town.

83/2018contd.

7. Again, on Page 16, point x) the Meeting was amazed by the comment 'Excellent transport systems. It was felt that residents living within Beeston may enjoy 'excellent transport systems' but the residents of Stapleford, were disadvantaged in this area of provision. The lack of a bus service from the North of the Town or Town Centre area to Beeston in the evening and the reduction of the 18 bus service, to one bus an hour only, and confined to the day only, the last bus from Stapleford being at 6.49p.m. This severely disadvantaged employment and/or educational prospects for residents without access to a car.

8. While the tram served the area of the Town adjacent to the tram stop and George Spencer Academy, it was not accessible to residents without access to a car. There was perceived need for transport linking the tram stop with the rest of Stapleford running during the day, evenings and at weekends.

9. The Town Council did not support development on designated green belt land and was most distressed by the amount of land that Broxtowe Borough Council had identified for potential removal from the precious green belt area, which separated the Town from surrounding villages and suburbs. Members were not in favour of the coalescence of the Town into the Greater Built Up Area.

10. Proposals regarding development on both sides of Coventry lane were not supported by the Town Council. Both these sites to the East(Bramcote), and West(Stapleford), off Coventry Lane, were important green belt areas, separating the Town from nearby Bramcote and Wollaton and vice versa, being an integral part of the important green corridor between the Borough and the City.

11. Further both sites were isolated from the main infrastructure of the Town. There was no public transport serving either site which would necessitate individuals moving to such a development to have access to a car. Particularly as there was an absence of infrastructure in this area, with no nearby schools, shops, health centres, community or leisure facilities. The parcels of land suggested for development were not large enough to support communities that would encourage the expansion of such services in this area and indeed there was no allocation of land for such purposes within the proposals. Thus, Members were concerned that such households would merely live within such a development and find their needs re: employment, shopping, leisure etc met elsewhere and thus they would contribute little to the economy of the local area. This would mean that not only would precious green belt be lost to the Town and neighbouring areas, potential new residents would be contributing little to the supposed regeneration of Stapleford, as referred to within the main document, as it was considered unlikely they would be utilising the facilities in the Town Centre. Further the access and egress to Stapleford and Bramcote via Coventry Lane was already highly congested at peak times and further development in this area would add to the traffic bottle necks already experienced by road users.

83/2018contd.

12. Moving on to pages 76, 77 and 78 of the Local Plan Part 2 and the discussion re the proposed HS2 Project, concern was expressed that the proposals within these pages was different from proposals expressed by D2N2 for the same area. Should the development plan as envisaged within the Local Plan Part 2 be taken to fruition the proposals for the area, contained within D2N2 document, to re-site George Spencer Academy and build a Leisure Centre adjacent to the Tram Stop, together with new road ways and junctions would suggest that the new build as envisaged within the Local Plan Part 2 could result in partial/selective demolition of the new build residential development.

13. Members considered it would be more sensible for this part of the Local Plan Part 2 to be re-written following full consultation with D2N2, the Town Council and other interested parties. This project was considered too important, by Councillors, to be left to chance and it was considered essential that all interested parties should be involved in the discussion regarding the best way to develop this site, to gain the most in terms of regeneration for the surrounding areas while ensuring the proposed development enhances the environment.

14. Policy 9, page 88 refers to the Retention of Good Quality Existing Employment Sites. While the Meeting recognised the aspiration contained within this Policy it was concerned that there was no clear indication of how these aspirations would be met. Further there was no clear indication of how this employment would be sustained and it was noted that the Bessell Lane/Palmer Drive area was subject to issues related to the HS2 Project. It was felt that a map indicating these key employment areas, together with other areas currently utilised as employment sites would have been useful when considering this consultation document.

15. On Page 100 the District Centre for Stapleford was considered and the Meeting expressed its concern regarding the proposals set out in this Strategic Policy. Members did not wish to see the area of the Town Centre area contracted. There were currently a number of attractive shops and thriving businesses in the area from Bessel Lane to Halls Road and to contract the Town Centre Area would do these businesses a dis-service. Further with the proposed HS2 Project there will be scope for development and growth in this area of the Town. There was a noticeable decline in shops/businesses within this proposed contracted area. This begs the question that by contracting this area, how would such action improve the district centre for business expansion.

16. Policy 15 on page 106 discussed Housing Size and mix and here great concern was expressed. Firstly, the lack of a clear identification of the number of units of new housing development that the Town was expected to accommodate within its designation as part of the main built up area created difficulties when commenting on housing allocation. (This issue had been identified by the Neighbourhood Plan Steering Group).

83/2018contd.

17. Within Policy 15 an allocation of only 10% affordable housing units had been identified, with no justification for this figure. Members accepted that there was a need for housing to be accommodated within the Town and it was further recognised that there was a substantial need for affordable housing to meet the needs of current and future generations of residents of the Town. It was the opinion of the Meeting that Broxtowe Borough Council needed to justify this low proportion of affordable housing being suggested for the Town. Stapleford contains two of the most deprived wards within Broxtowe Borough, (Stapleford North and Stapleford South West), and surely this indicates a need for a higher proportion of affordable housing than the 10% identified within the Local Plan Part 2. This begs the question that does this proposal serve the needs of local residents?

18. Regarding Policy 20: Air Quality - the Meeting was surprised that no particular mention was made regarding Stapleford which also suffers from poor air quality. The congestion on the main roads in and out of the Town, the road humps on Derby Road, issues that have been raised re certain employment sites and emissions, all make the need to monitor and act effectively to improve the air quality in the Town imperative and in line with current Government initiatives.

19. Members considered that the proposals affecting designated and non-designated heritage sites, Policy 23, did not emphasis sufficiently the Heritage Assets contained within Stapleford. No mention was made of former Police Station, Carnegie Centre, the Old Cross Public House, former Whiteley Mill, Stapleford Cemetery and Bob's Rock.

20. The Meeting was not satisfied with this Local Plan Part2 Members felt that it had to a great extent ignored Stapleford and offered little in the way of positive prospects for the Town's regeneration while making sweeping statements that showed little justification in the printed document.

21. There was no evidence of sustainability or of how aspirations that were listed within the policies could be achieved for Stapleford. It was agreed that there was a need for Section 106 gains to be spent in the Town for the good of the residents and that full consultation should be held when such monies were available for distribution. It was noted that that Members were unaware of how Section 106 monies achieved from the Field Farm Development would benefit the Town and that this was unacceptable.

22. Members also wished to see sensible allocations of affordable housing in the Town and that when Developers were building in the Town and were obliged to provide affordable housing within that development that they should not be allowed to negotiate with Broxtowe Borough Council to move such allocations of housing elsewhere in the Borough or buy their way out of the obligation.

83/2018contd.

Following this discussion of the Local Plan Part 2, the Town Clerk was instructed to send a full Minute Reference of this discussion to Broxtowe Borough Council, as the Town Council's official reply to this consultation. Broxtowe Borough Council were also asked to work with the Town Council and D2N2 to ensure that HS2 brought the maximum benefits to the Town and surrounding area.

Further Members were encouraged to make their own, personal comments re the Broxtowe Borough Council Local Plan Part 2 direct to Broxtowe Borough Council using the online facility on the Broxtowe Borough Council Web Site.

The Town Clerk was also requested to send copies of this Minute Reference to Members in attendance at this Meeting for information only.

[redacted]

From: Councillor Richard MacRae [redacted]
Sent: 03 November 2017 15:40
To: Policy; Saunders, Steffan
Subject: The Part 2 Local Plan

I am sending in my comments and concerns regards Part 2 Local Plan as they need to be in before 5pm today.

I do not feel that more development should take place on the West of Coventry Lane as this will also join up with the development on Field Farm, I find it sad that the Council never made it clear they own the land behind Bramcote Crematorium in the past. There is already enough development taking place in this area, also the Stapleford Neighbourhood Plan has suggested alternative sites for development, this should be taken into consideration.

Attention was drawn to comments made on page 12 of the document re 'Employment where it was stated that 'Broxtowe was a thriving and vibrant place with access to services jobs and opportunities for all.' The Meeting saw no evidence for this statement. Likewise, the comments relating to 'Community Safety' where Members were concerned there was no evidence to justify this statement or proposals of how the aspirations would be achieved.

I am aware Stapleford Town Council have submitted the above and I have to say I fully agree with the statement, Community Safety and Broxtowe will be a safe place, sadly this is something that many people in Stapleford do not feel at the minute, anti social behaviour and drugs are a major issue that need to be tackled asap, apart from a lot of talking we are not seeing much evidence of anything being done and most of the people causing these issues sad to say are Council Tenants, breach of Tenancy Agreement comes to mind.

Regarding HS2 again the Town Council have said the following **Not enough attention was being paid to the opportunities that would arise with the development of HS2 and associated projects.** And again I fully agree and it would seem meetings have taken place yet Stapleford Councillors and local residents who will of course be affected have not been invited to such meetings. One reason I proposed the Town Council set up a HS2 Working Group.

With regard to 'Health and well-being', page 16 point viii) this was an area that concerned the Town Council as there appeared to be an absence of proposals to achieve the improved health and well-being of the Town's residents or make any positive suggestions for the development of new community facilities within the Town.

Again the above is what the Town Council have said and i am very disappointed that with the future closure of the Stapleford Community Centre there is no mention of any improvements to any other Community facilities, it would be good to put all efforts into the regeneration of the Pavilion on Hickings Lane Recreation Group and also the play area too, it is a lost opportunity and a great place which could do with improvements all around. maybe using section 106 funding.

Also the Speed Humps in Stapleford need to be removed, this would be a huge benefit to the businesses are more people would drive through Stapleford instead of around the Town Centre. Also removing htem would help with improving the Air Quality in the Town Centre.

Talking of the Town Centre it is about time the boundary was extended to include all the shop from Halls Road down to Bessell Lane, instead of shrinking the area.

There is no way for people to get regular transport from Stapleford North Ward up to the Tram Terminus on Toton Lane, Stapleford and there is no Bus to or from Stapleford in the evening to get to and back from Beeston at all.

I would also like to see the development of affordable housing on future developments increased as the current 10% figure is to low especially when compared to other areas.

There is no mention of development and regeneration of the Walter Parker VC Memorial Square on Derby Road, another missed opportunity as at the minute is is to cluttered, I did actually speak to Phil Horsefield about this and as far as i am aware he passed on my ideas to Ryan Dawson. I hope these can be considered in more detail.

Many thanks

Councillor Richard MacRae
Stapleford North Ward

[redacted]

Broxtowe Part 2 Local Plan

Broxtowe Borough COUNCIL

Agent

Please provide your client's name	Harworth Group

Your Details

Title	[redacted]				Other:
Name	[redacted]				
Organisation (if responding on behalf of the organisation)	Pegasus Group				
Address	[redacted]				
Postcode	[redacted]				
Tel. Number	[redacted]				
E-mail address	[redacted]				

Comments should be received by 5.00pm on Friday 3rd November 2017

If you wish to comment on several policies, paragraphs, or sites, please use a separate form for each representation.

If you would like to be contacted by the Planning Policy Team regarding future consultations.

Please tick here ☐

Please help us save money and the environment by providing an e-mail address that correspondence can be sent to: [redacted]

For more information including an **online response** form please visit:

www.broxtowe.gov.uk/part2localplan

Data Protection - The comment(s) you submit on the Local Development Framework (LDF) will be used in the plan process and may be in use for the lifetime of the LDF in accordance with the Data Protection Act 1998. The information will be analysed and the Council will consider issues raised. Please note that comments cannot be treated as confidential and will be made available for public inspection. All representations can be viewed at the Council Offices.

Please return completed forms to:

Planning Policy, Legal and Planning Services, Foster Avenue, Beeston, Nottingham NG9 1AB

For more information: Tel: 0115 917 3452, 3448, 3468 or 3015 E-mail: policy@broxtowe.gov.uk

Question 1: What does your comment relate to? Please specify exactly

Document	Policy number	Page number	Policy text/ Paragraph number
Part 2 Local Plan	**Policy 1**: Flood Risk		
	Policy 2: Site Allocations		
	Policy 3: Main Built up Area Site Allocations		
	Policy 4: Awsworth Site Allocation		
	Policy 5: Brinsley Site Allocation		
	Policy 6: Eastwood Site Allocation		
	Policy 7: Kimberley Site Allocations		
	Policy 8: Development in the Green Belt		
	Policy 9: Retention of good quality existing employment sites	87-89	Policy 9
	Policy 10: Town Centre and District Centre Uses		
	Policy 11: The Square, Beeston		
	Policy 12: Edge-of-Centre A1 Retail in Eastwood		
	Policy 13: Proposals for main town centre uses in edge-of-centre and out-of-centre locations		
	Policy 14: Centre of Neighbourhood Importance (Chilwell Road / High Road)		
	Policy 15: Housing size, mix and choice		
	Policy 16: Gypsies and Travellers		
	Policy 17: Place-making, design and amenity		
	Policy 18: Shopfronts, signage and security measures		
	Policy 19: Pollution, Hazardous Substances and Ground Conditions		
	Policy 20: Air Quality		
	Policy 21: Unstable land		
	Policy 22: Minerals		
	Policy 23: Proposals affecting designated and non-designated heritage assets		
	Policy 24: The health impacts of development		
	Policy 25: Culture, Tourism and Sport		
	Policy 26: Travel Plans		
	Policy 27: Local Green Space		
	Policy 28: Green Infrastructure Assets		
	Policy 29: Cemetery Extensions		
	Policy 30: Landscape		
	Policy 31: Biodiversity Assets		
	Policy 32: Developer Contributions		
Policies Map			
Sustainability Appraisal			
Other (e.g. omission, evidence document etc.)			

Please use a separate sheet of paper if required. Please use one form per representation.

Question 2: What is the issue with the Local Plan?

Do you consider this paragraph or policy of the Local Plan to be: *(please refer to the guidance note at for an explanation of these terms)*		**Yes**	**No**
2.1	Legally compliant	✓	
2.2	Compliant with the duty to co-operate	✓	
2.3	Sound		✓

Question 3: Why is the Local Plan unsound? Please **only** answer this question if you answered '**No' to 2.3** above

If you think this paragraph or policy of the Plan is not sound, is this because:	
It is not justified	✓
It is not effective	✓
It is not positively prepared	✓
It is not consistent with national policy	

Your comments

Please give details of why you consider this part of the Local Plan is not legally compliant, is unsound or does not comply with the duty to co operate. Alternatively, if you wish to support any of these aspects please provide details. Please be as precise as possible. Continue on an extra sheet if necessary.

Policy 9 of the Submission Draft Plan sets out a policy for the retention of good quality existing employment sites. A number of existing sites are identified for safeguarding for continued employment uses.

Policy 4 of the Aligned Core Strategy indicates that sufficient supply should be made in Part 2 Local Plans for the provision of additional employment land, in the case of Broxtowe for some 15 hectares of land. The Council's Site Selection Background Paper explains that this requirement can be provided on a selection of urban sites, including schemes already approved and at the proposed allocations at Chetwynd Barracks and the Toton Strategic Location for Growth. Other than the latter two sites, the plan makes no specific allocations for employment land provision.

It is considered that this approach fails to either consider the need or opportunity for rail related employment development, including that related to the proposed construction of HS2. Nor does it consider the potential need for replacement land to accommodate rail related activities that would be displaced by the development of a HS2 station at Toton Sidings.

As a result, the plan is not adequately justified, effective or positively prepared and is therefore unsound in relation to its approach to employment development and more specifically in relation to rail related employment opportunities. The National Planning Policy Framework (NPPF) is clear that the Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth and that significant weight should be placed on the need to support economic growth through the planning system.

The former Bennerley Coal disposal point to the west of Shilo Way, Awsworth, is owned by the Harworth Group and extends to some 20 hectares. The site consists of large areas of hardstanding associated with the coal distribution depot dismantled in the mid-1990's. There is an existing high standard vehicular access from the A610 and an existing rail spur from the Midland Mainline runs in to the site. The site has the benefit of a lawful use for the reception, storage and dispatch of coal.

With its existing rail connection, the site offers a unique opportunity for the development of a range of rail related employment activities. The Submission Draft Plan has not properly considered the need and potential for rail related employment on the site and the extent to which there would be exceptional justification for the allocation of this Green Belt site for development in the Local Plan.

Submissions were made on behalf of the Harworth Group at previous stages of the Local Plan process, demonstrating the potential for the redevelopment of the site. In order to demonstrate the suitability for the development of the site for rail related uses, Harwoth commission AECOM to provide an assessment of Freight Feasibility. A copy of this report is attached as part of this representation at **Appendix 1**.

The AECOM report provides a strategic overview of the UK rail market to identify main market segments and considers the opportunities presented by the Bennerley site and how this would operate. The report concludes that the site is one of the few available within the region that could be suitable for the development of rail connected infrastructure.

In terms of potential demand, the report concludes that there is a significant need to develop sites that are suitable for the construction and/or maintenance of both rail infrastructure and rolling stock renewal programs. The report also notes interest from at least five passenger operations and five freight companies, and several rolling stock leasing companies, all with operations within the East Midlands.

The report then considers the opportunities for three principal rail uses – rail manufacturing and construction, a train maintenance facility and a rail connected warehouse. The rail manufacturing and construction option would enable the manufacture and distribution of rail components to both the existing rail network. AECOM has identified interest from a number of operators for a train maintenance or assembly facility. The site's location also makes it suitable for rail connected warehousing on the site. The indicative concept plan at **Appendix 2** shows how the site could be developed for rail related employment activities.

The site falls within Green Belt and would therefore need to be brought forward as an additional allocation in the plan. Submissions were previously made by the Harworth Group to the Council's Green Belt Boundary Review consultation in March 2015, setting out the reasons why there were exceptional circumstances to justify an amendment to the Green Belt boundary in this location.

In terms of the five functions of Green Belt, the following comments can be made in relation to the Bennerley Coal Disposal Point;

Checking the unrestricted sprawl of large built-up areas. The Bennerley site is well defined by clear physical boundaries and is self-contained so would not extend the built up area of existing settlement boundaries and would not result in the unrestricted sprawl of large built up areas;

Preventing neighbouring towns merging. The Bennerley site is a self-contained brownfield site with existing lawful use as a coal disposal point. It has been an industrialised feature within the wider Green Belt between Awsworth and Ilkeston for many years. Development would not result in the merging of the nearby settlements;

Safeguarding the countryside from encroachment. With the former coal disposal point and other adjoining uses, the location is an urban fringe area strongly influenced by surrounding built and industrial development. The site is brownfield with a lawful use on a self-contained site. Development would therefore safeguard the wider undeveloped countryside from encroachment;

To preserve the setting and character of historic towns. Development of the site would not affect the setting and character of a historic town. Whilst there would be a less than substantial impact on the listed Bennerley Viaduct, development can assist in the restoration of the viaduct and its opening up for recreational walking and cycling;

To assist in urban regeneration. The site is a vacant previously developed site. Development would enable the regeneration of the site for employment uses meeting the specific locational requirements of potential users.

In terms of the exceptional circumstances justifying an amendment to the Green Belt boundary, the site represents a major developed site in the Green Belt that would benefit from redevelopment. In the absence of development, the site will remain derelict, detracting from the wider Green Belt area. The site is one of a very limited number of rail connected sites that can cater for the specific requirements of rail related activities as outlined in the AECOM report submitted alongside these representations.

There is therefore a clear justification to amend the Submission Draft Local Plan to allocate the land at the former Bennerley Coal Disposal Point for rail related uses. This would ensure that the identified specific needs of a number of rail related businesses could be catered for in the Borough, with the associated important local employment benefits.

Question 4: Modifications sought

Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. Continue on an extra sheet if necessary.
The plan should be amended to allocate the land at the Bennerley Coal Disposal Point for rail related employment uses and the Proposals Map should be amended to show the allocated site removed from the Green Belt as indicated on the plan at **Appendix 3**.

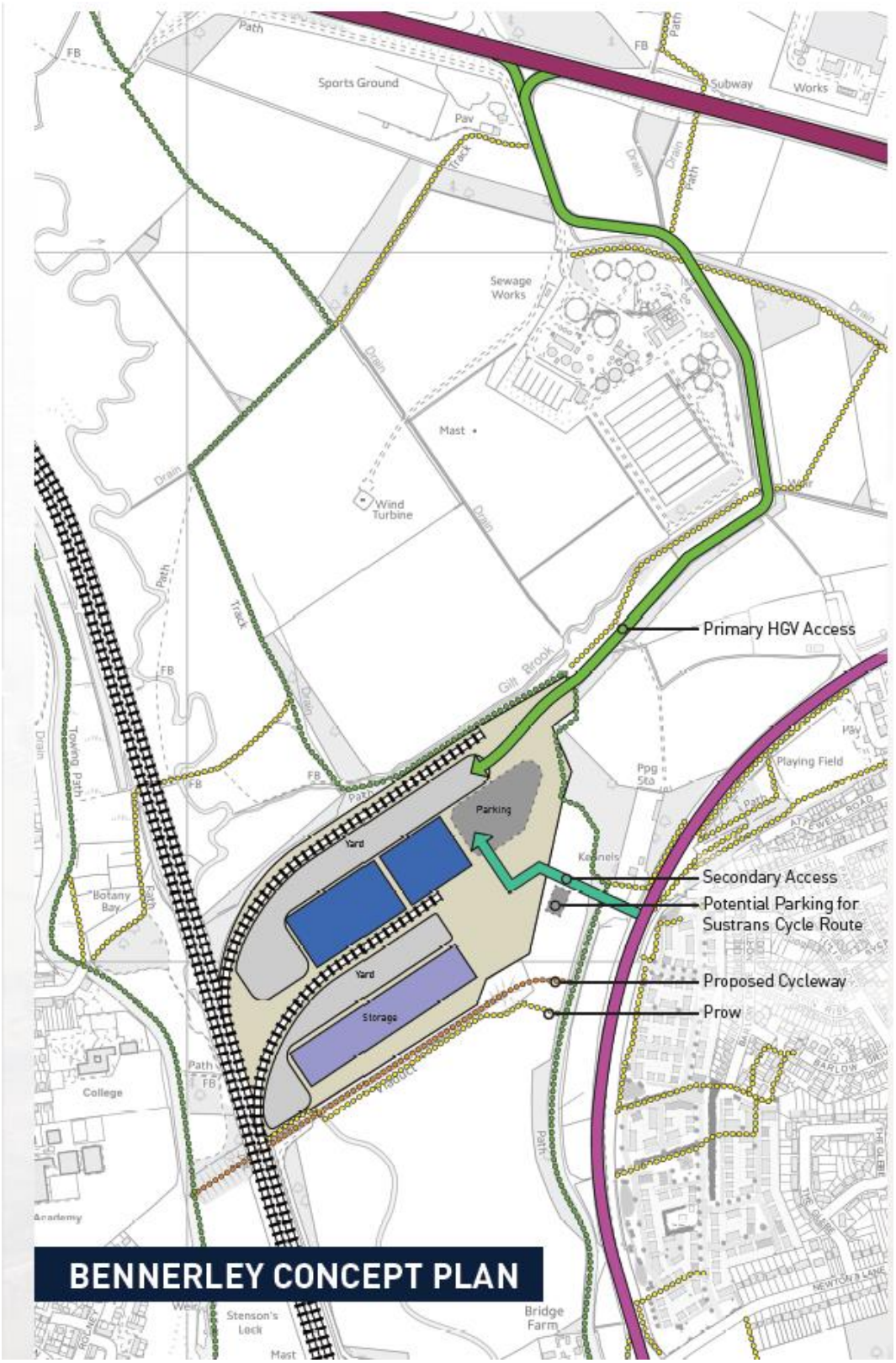
Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. **After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

Question 5: Public Examination Attendance

If your representation is seeking a modification, do you consider it necessary to participate at the public examination?	
Yes, I wish to participate at the public examination	✓
No, I do not wish to participate at the public examination	
If you wish to participate at the public examination, please outline why you consider this to be necessary	
It is important that the Harworth Group is represented at the Examination to demonstrate that the proposed allocation is a suitable and deliverable housing allocation.	

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the public examination.

Appendix 1: Indicative Masterplan



Appendix 2: AECOM Report

Bennerley Development Proposals

An assessment of Freight Feasibility

Harworth Estates Investments Ltd

Project Number: 60541692
Final Report

July 2017

Quality information

Prepared by	Checked by	Approved by
[redacted]	[redacted]	[redacted]
Dan Bowden Principal Consultant	**Michael Whittaker** Associate Director	**Geoff Clarke** Regional Director

Revision History

Revision	Revision date	Details	Name	Position
First Draft	23-05-2017	Draft Report	Dan Bowden	Principal Consultant
Second Draft	17-07-2017	Final Report	Dan Bowden	Principal Consultant

Prepared for:

Harworth Estates Investments

[redacted]

Prepared by:

[redacted]

AECOM Limited

[redacted]

aecom.com

Table of Contents

1. Introduction

1.1 Introduction

Harworth Estates Investments Ltd, part of Harworth Group commissioned AECOM to undertake an assessment of freight feasibility of the client's former Bennerley Coal Terminal site located at Awsworth adjacent to the Nottinghamshire / Derbyshire border within the East Midlands. Awsworth is part of the Broxtowe Borough Council area in Nottinghamshire. The site is in the Erewash Valley and across the river is Ilkeston in Derbyshire. This report provides a summary review of the site background, UK rail market, freight background, strategy justification and aligned options that potentially exist for the site.

1.2 Structure of report

This report is structured as follows:

Chapter 1: Introduction

Chapter 2: sets out the background and history of the site

Chapter 3: provides a strategic overview of the UK rail market in setting the scene for the main market segments and provides a context for providing input to possible rail related development options.

Chapter 4: considers the opportunities presented by Bennerley in terms of its suitability

Chapter 5: states how the site sits within the framework of international, national, regional and local policy currently in place regarding the growth of the rail industry.

Chapter 6: sets out the nature of potential proposed at Bennerley, and how this would operate.

Chapter 7: looks at alternative sites for the facilities proposed at Bennerley

Chapter 8: Conclusions

1.3 Report Summary

Having reviewed the assets, location and availability of Bennerley, as well as the demand for rail development within the Midlands and wider UK, the report concludes that the site is one of the few available within the region that could be suitable for the development of rail connected infrastructure.

This could include a number of possible uses including rail manufacture and maintenance, rolling stock maintenance and rail connected warehousing.

2. Background

2.1 Introduction

This chapter explores the history of the former Bennerley Coal Terminal site. It takes into consideration when the site first opened, its uses as an ironworks and coal site, the decline in coal and closure of the site. In addition, consideration is also given to the surrounding rail infrastructure which supported movement of coal from the site as well as current and planned rail investment in the East Midlands.

2.2 History

2.2.1 Background

The site of the former Bennerley Coal Terminal site is located between the recently completed Ilkeston station to the south and Langley Mill to the north (**See Figure 2.1)**. The site first opened in 1874, as an ironworks site and was located north of the Bennerley viaduct served by sidings connected to both the Great Northern Line and the Midland Railway Erewash Valley line. The ironworks were in operation for 60 years and closed in 1934. After demolition of the ironworks a British Coal Distribution depot served by sidings from the former Midland Railway occupied the iron works site, however this has now been demolished. The Bennerley site is based on the level, with the potential rail siding(s) coming in from the Erewash River (south facing) connection.

Figure 2.1: Site Location

2.2.2 Opening

Bennerley Ironworks opened in 1874, the iron works site had a large network of associated sidings, and it acted as a railway junction. The Bennerley Ironworks were located North of the Bennerley Viaduct, which, is one of the two remaining wrought-iron viaducts in England and is a Grade II* listed structure. The Viaduct opened to commercial traffic in January 1878, having been completed in November 1877 for the Great Northern Railway (GNR).

The viaduct was designed to span the Erewash valley between Ilkeston in Derbyshire and Awsworth in Nottinghamshire. The viaduct was strategically located next to, or had connections to six collieries in the area and as such coal was the mainstay of freight traffic. In addition Hardy and Hanson in Kimberley also had sidings on either side of the line serving their brewery. In addition, the use of the line for freight traffic also meant passenger trains could travel from Kimberley via the Bennerley junction to the Midlands Ilkeston Town Station.

2.2.3 Closing

Bennerley Ironworks closed in 1934 however the building survived until the early 1980's and it was used as a coal distribution centre by British Coal (**see Figure 2.2)**. Coal mined from local drift mines was stored and distributed by rail in the 1960's. In the late 1990's the site was demolished however there are still remains of its industrial past remaining, for example the site of the weighbridge.

Figure 2.2: Bennerley Open Cast Coal and Viaduct

2.2.4 Decline of coal

At its peak the British coal industry employed over a million people and was one of the most important industries. Transport, power and related industries were heavily reliant on coal. The decline of the British coal industry started after the First World War; however it was accelerated after the Second World War in particular after the miners' strike in 1984. In the 10 years after the 1984–5 miners' strike, employment by British Coal and the number of pits it operated fell by more than 90%. The decline of coal has continued with the majority of coal mining sites in the UK closing down. In addition, due to new energy sources, government policy, and climate change regulation, coal movement on the rail network has decreased substantially.

2.3 Renaissance of the Railway

2.3.1 New passenger station

Ilkeston rail station (**see Figure 2.3)** first opened to rail traffic in 1878 however it became a casualty of the Beeching railway cuts of the 1960s and the line closed in 1967. Ilkeston has been one of Britain's largest towns without a train station for around 50 years.

In early 2017, a £10 million station project for Ilkeston was made possible through the government's infrastructure investment package which is administered through the New Stations Fund. The new Ilkeston train station will be operated by East Midlands Trains (EMT) and Northern Rail (Arriva) will offer direct hourly trains to Chesterfield, Sheffield, Leeds and Nottingham and EMT trains will also call at least three times a day on the Norwich to Liverpool service. It is estimated that the station will be used by 160,000 people in its first year.

Figure 2.3: Ilkeston Train Station

2.3.2 Biggest investment in railways for 50 years

As will be discussed later in this report the railway has been seeing a strong growth in passenger numbers and rail freight had grown by 60% since privatisation in 1994. This resurgence in fortunes prompted the Government to embark on a large investment programme in infrastructure and rolling stock.

The East Midlands Region is backing HS2, the high speed route is planned to reach the area in 2033 as part of Phase 2b, with a hub station in Toton (midway between Derby and Nottingham) in Broxtowe Borough Council, as shown in the figure overleaf.

HS2 plan to take over much of the Toton site for the new East Midlands hub station on the site of the former marshalling yards, where High Speed Rail (HS2) will run parallel to the existing Erewash Valley line, **see Figure 2.4.**

A number of local authorities and businesses have collaborated under the banner of the East Midlands HS2 strategic board which aims to provide leadership and direction on issues

relating to HS2 and assist the region in realising opportunities offered by HS2.[1] The NET Nottingham Express Transit system will also be extended from Toton to provide interchange into the new HS2 station.

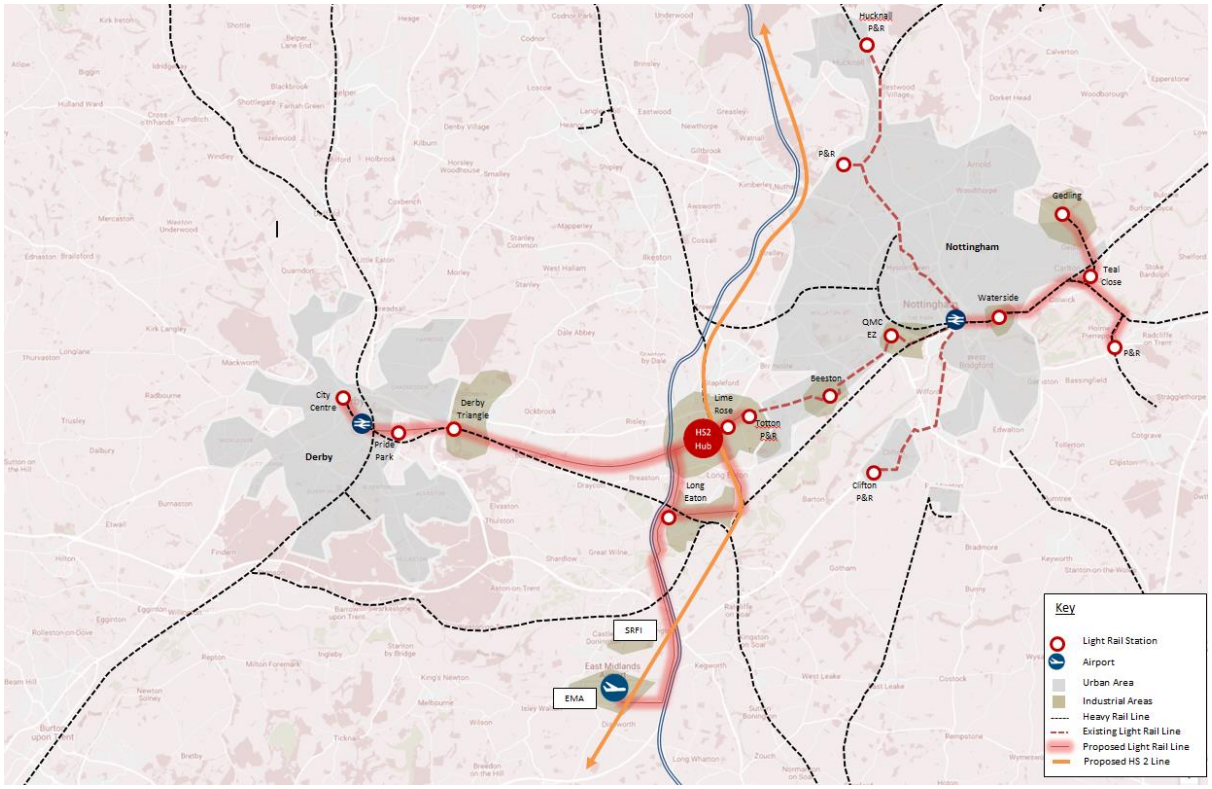


Figure 2.4: HS2 Route and NET Extension

2.4 Sustrans – Sustainable transport

Nottinghamshire's LTP cycle strategy 2016 has a target of growing the number of cycle trips from 3% to 10% of the total number of journeys by 2025. The council has aspirations for a cycle network that links people to jobs as well as the leisure market. Sustrans research shows that cycling schemes have an average BCR of 3:1 which is much better than most other road investment projects.

Sustrans vision is to develop the Bennerley Viaduct (**see Figure 2.5)** as a cycle path and footpath which will provide a direct route across the valley. The Bennerley Viaduct structure is currently owned by Sustrans who are formulating a bid for Heritage Lottery money to fund the works required to bring the viaduct into use.

Earlier this year Sustrans held consultation events in Ilkeston and Awsworth to publicise their plans to restore the historic Bennerley Viaduct and reuse it for a cycling and walking link between Nottinghamshire and Derbyshire. The 1,452 foot long bridge would be used as part of a through route between Nottingham and Derby, and with good connections to both sides of the Erewash valley, including the Erewash Valley Trail.

The viaduct is of national importance and provides vital links in the network of existing and proposed paths and cycle ways. Developing the viaduct will offer people in the region sustainable transport routes for commuting and leisure purposes. In addition a re-opened viaduct would enable easier connectivity from Ilkeston to Awsworth and other employment sites.

[1] Modern Railways – East Midlands Heart of the Rail Industry (April 2017) Pp14

Figure 2.5: Bennerley Viaduct: Harworth are providing land and material to create a new embankment which will re-connect pedestrian and cycle access over the viaduct with a new signal controlled junction on Shilo Way.

3. Rail Market Overview

3.1 Introduction

This chapter provides a strategic overview of the UK rail market describing the main market segments and provides a context for input to the proposed development options.

3.2 Rail Freight Overview

The rail freight sector delivers significant benefits to the UK economy and this has been quantified at £1.6bn per year in productivity gains, reduced congestion and environmental benefits. The five main Freight Operating Companies employ over 5,000 staff and have a combined turnover of around £850m[2]. The sector is going through a period of significant change as the decline of coal provides opportunities for other commodities to replace the coal movements. It is also essential that market demand is covered in the study to ensure that the facilities provided at the Bennerley site are compatible with the requirements of industry.

Figure 3.1 shows the movements of particular commodities by rail between 1998 and 2016 in terms of billion tonne kilometres. Over the period, coal, construction materials and domestic intermodal all increased whilst metals, oil & petroleum, international and other freight movements all decreased. However, overall, total billion tonne-kilometres increased by 22%. Construction materials grew by the greatest margin (96%) and international movements decreased by the greatest amount (40%).

It is worth noting that since the beginning of 2016, coal movements have decreased substantially, making the identification and growth of other sectors more important if the rail freight market is to avoid decline.

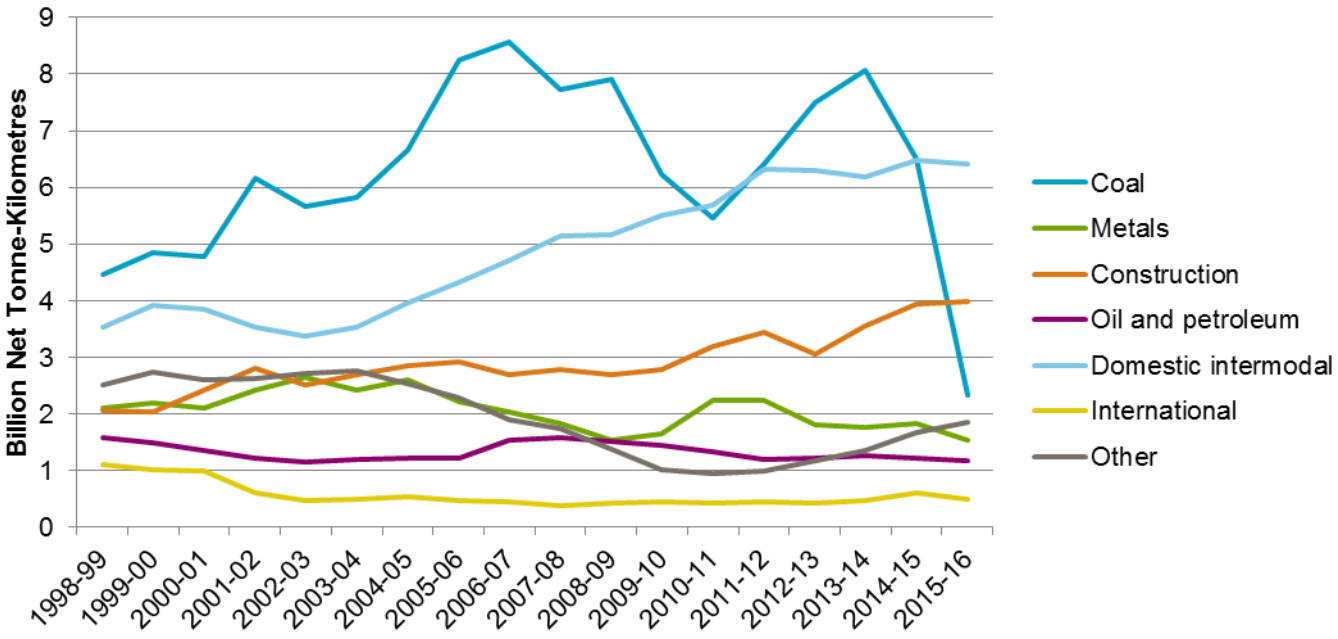


Figure 3.1: Rail Freight Tonnes Kilometres by Commodity (1998 – 2016)

Figure 3.2 shows the total tonnage lifted by rail freight between 1985 and 2016. Whilst fluctuating, tonnage has increased over the last 15 years to over 100 million tonnes.

[2] Rail Delivery Group, *Freight Britain*, (2015)

Fluctuations can be attributed in part to changing data collection methodologies. Freight lifted in 2016 is trending downwards due to aforementioned decline of the coal market.

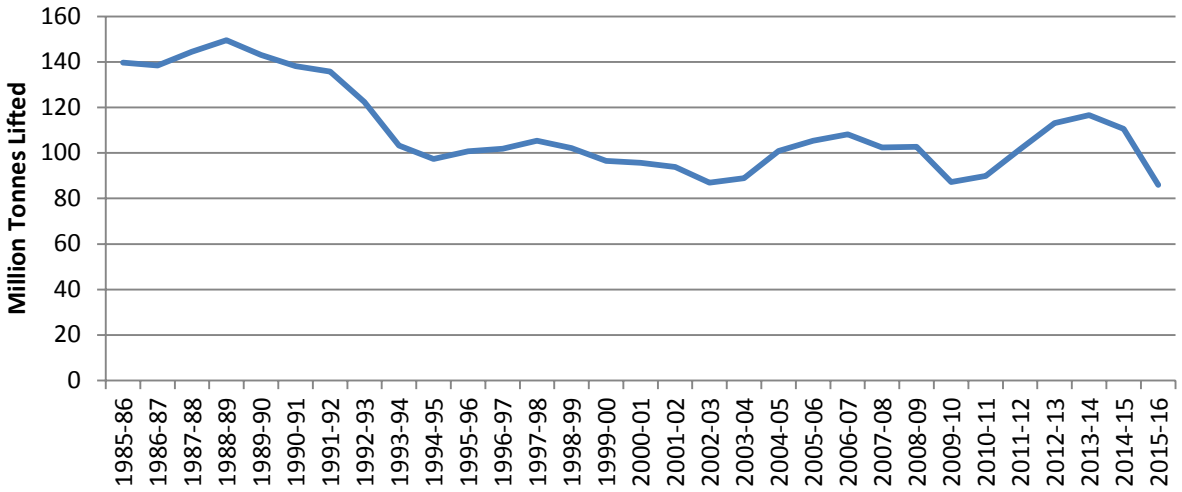


Figure 3.2: Rail Freight Tonnes Lifted (1985 – 2016)

3.3 Rail Freight Forecasts

Recognising that certain flows such as waste, petrochemicals, other minerals and engineering supplies for Network Rail are likely to remain relatively static, it is clear that there are other sectors with real potential for growth.

As shown in **Figure 3.3** biomass is forecast to replace some of these movements, increasing from 0.15 billion tonne/km in 2010 to 2.34 billion tonnes/km in 2043.

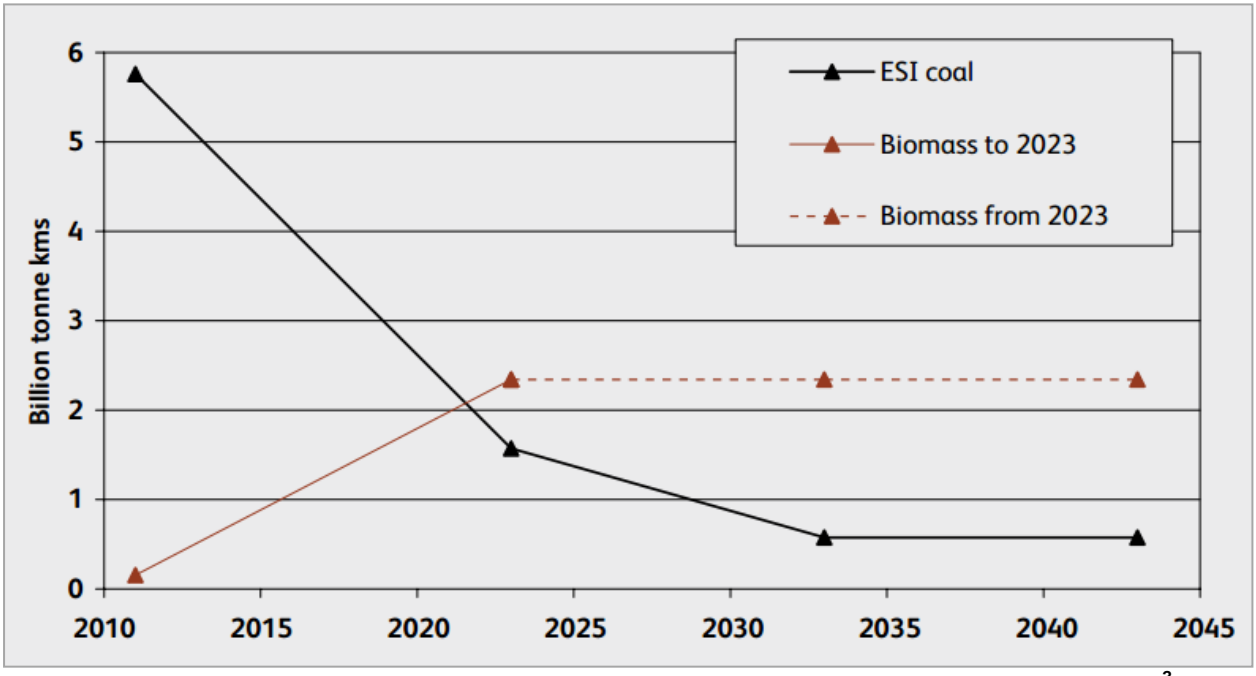


Figure 3.3: ESI Coal and biomass forecasts: tonne kilometres moved (with 2011 actual data)[3]

[3] Network Rail (2013), Long Term Planning Process: Freight Market Study

AECOM was commissioned by the UK Department for Transport (DfT) in 2016 to assess the potential for modal-shift and rail freight growth. **Table 3.1** shows the 14 different commodities/sectors considered as part of this project along with a summary forecast to 2030.

Table 3.1: Rail Freight Summary Forecasts (Source: DfT Rail Freight Strategy 2016)

Commodity/Sector	Summary Forecast
Energy:	
Electricity Supply Industry (ESI) Coal,	Long-term decline
Biomass	Static
Nuclear Energy	Long-term decline
Construction Materials	**Long-term growth**
Intermodal (Ports)	**Steady growth**
Intermodal (Domestic)	**Steady growth**
Channel Tunnel	**Limited growth**
Metals	Static
Petroleum/Oil	Static
Chemicals	Static
Automotive	**Slow growth**
Non-ESI Coal	Long-term decline
Industrial Minerals	Static
Domestic Waste	Static
Ore	Static
NR Engineering	Static

As shown in **Table 3.1,** there are a number of commodities/sectors, which are forecast to grow:

- Construction
- Intermodal (Ports)
- Intermodal (Domestic)
- Channel Tunnel
- Automotive

In addition to the commodities/sectors discussed above, there are a number of others that could prove to be an important part of any future rail freight mix. However, at present, the volumes concerned did not merit forecasting. In summary, these commodities/sectors are:

- Parcels
- Premium Rail Freight
- Urban Logistics
- International High-Speed Rail Freight

3.4 Passengers Rail Market Overview

The railway network is an important economic and social asset for the East Midlands; this is demonstrated by a 40 per cent increase in its use by passengers over the last ten years. Looking to the future, significant growth in passenger numbers is forecast to continue – up by 31 – 40 per cent by 2023, and between 53 – 114 per cent by 2043.[4]

Analysis in 2015 by the Rail Delivery Group, which represents train operators and Network Rail, and is based on data from the auditors KPMG found that people make an average of 24.7 train journeys a year, a 60% increase from 1998, when private operators took over running UK train services from British Rail. The growth in journeys is faster than in France at 25%, Germany at 23% and the Netherlands at 10% over the same period.

As Passenger numbers continue to grow strongly, an industry steering group comprising operators, financiers, Network Rail and industry associations such as the Rail Delivery Group estimated the UK heavy-rail industry (not including London Underground) will need to grow the total passenger train fleet by between 53% and 99% over the next 30 years.

This Long Term Passenger Rolling Stock Strategy published in February 2014 stated there will be a need for between 13,000 and 19,000 new electric vehicles on top of the existing national fleet of 12,647 vehicles. This presents challenges and opportunities surrounding financing rolling stock in the UK, and how the marketplace needs to keep up with demand.

The current rail investment period 2014-2020 is marking the most sustained period of train building for over 50 years. It is expected that 6,000 new railway carriages will come into service by 2020 according to the Rail Delivery Group.

In the last year 1,000 new vehicles have been ordered, half of which are for the new Northern and Trans Pennine Express (TPE) franchises and the remainder joining the network from the West of England to the Midlands and the North.

The implications of the resurgence in rail travel is that more trains need to be built and maintained and older trains need refurbishment which includes repainting, and fitting out with modern décor, seats and electronic systems. This ideally requires rail connected sites to be able to facilitate this process in a timely and economic way.

In order to provide further information around this opportunity, an analysis on the rolling stock and its replacement has been undertaken as follows:

3.5 Rolling stock

3.5.1 Rolling Stock Replacement Analysis

Using the Long Term Passenger Rolling Stock Strategy for the Rail Industry document (March 2016)[5] - that sets out current and future rolling stock requirements by broad typology for the network based on demand growth, current fleet profile, and committed infrastructure changes (Crossrail, electrification, etc.). At the same time, the DfT 2016 Rolling Stock Perspective[6] sets out the planned withdrawal dates for existing rolling stock by operator. Combining the two (and a few other sources) gives a reasonable estimate of the overall rolling stock replacement programme going forward.

The fleet is forecast to grow rapidly – 15% by 2019 and 50% by 2034. However, the actual replacement schedule is determined by rail franchisees and therefore large purchases are ultimately made at the time of refranchising.

Table 3.2 sets out the numbers of rolling stock belonging to franchisees running services due in the Nottingham area and due for replacement each year:

[4] file:///C:/Users/Masamvin/Downloads/east-midlands-route-study%20(3).pdf pp 3
[5] http://www.raildeliverygroup.com/files/Publications/2016-03_long_term_passenger_rolling_stock_strategy_4th_ed.pdf).
[6] (https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/524445/rolling-stock-perspective.pdf)

Table 3.2: Rolling Stock Replacement Schedule (AECOM estimate)

Year	East Midlands	Cross Country	London Midland	Total
By 2019	207	90	16	313
By 2024	282	96	52	430
By 2034	344	604	258	1206

There are 12 train manufacturers operating in a competitive world market:

Table 3.3: Train Manufacturers

Manufacturer (s)	Site (s) in UK	Site Location (s)
Alstom Transport	Yes	Widnes
Bombardier	Yes	Derby
CAF	Actively looking	-
CRRC Corporation	Actively looking	-
Hitachi Rail	Yes	Newton Aycliffe
Hyundai Rotem	No	-
Kawasaki Heavy Industries Rolling Stock Company	No	-
Siemens Mobility	Actively Looking	-
Škoda Transportation	No	-
Stadler	Yes	Liverpool
Talgo	No	-
Wabtec	Yes	Loughborough / Doncaster

The renaissance in the railway has prompted many of these train manufacturers to investigate the business case for building a plant in the UK. Hitachi opened an assembly plant last year, Stadler have chosen to locate a new facility in Liverpool, Alstom are opening a new site in Widnes and several others are looking for suitable sites. The East Midlands with its railway heritage could attract one of these manufacturers.

3.5.2 Rolling Stock Maintenance

As well as new trains, refurbishment of existing trains is required approximately every 10 years of service as well as regular maintenance at more frequent intervals. **Table 3.4** forecasts the numbers of rolling stock due for refurbishment over the next 18 years.

Table 3.4 Rolling Stock Refurbishment Schedule (* is an estimate)

Year	East Midlands	Cross Country	Northern	Total
During 2019	43	46	64*	153*
During 2024	46	50	68*	164*
During 2034	56	60	83*	199*

Increasingly trains are leased on a contract maintenance basis where the manufacturer sets up a 'servicing' depot in close proximity to the operator's franchised network. Suitable sites are always in demand near key operational nodes such as Nottingham.

3.6 Railway Infrastructure

With the growth in passengers the rail industry is investing in additional capacity, double tracking single lines, putting in rail flyovers and even new routes such as Crossrail, the East-West line from Oxford to Cambridge and much more. In addition HS2 has received Royal Assent, allowing it to be built. These schemes need new sites for railway construction purposes, ideally near the projected new routes. So HS2 will need new infrastructure depots in the years to come.

4. Bennerley's Suitability for Rail Connected Infrastructure

4.1 Introduction

In this section we consider whether Bennerley is able to provide an attractive, suitable site. To determine this we look at various attributes as follows

- Site Location (good geographic location in Central UK with southbound connection to the "Classic" rail network and HS2 at Toton)
- Rail network capacity (would there be train paths available to/from the site?)
- Site Size and Shape (is the site is suitable in terms of operational practicality?)
- Site Availability (is the site available; and status of track or otherwise)
- Reinstatement (is the site connected or not?)
- Proximity to required local labour pool (is there a skilled labour within a suitable access time?)
- Potential Demand (What needs can the site fulfil?)

4.2 Site Location

Bennerley is located in Nottinghamshire in the East Midlands, with the road entrance off the A610 dual-carriageway (near the Ikea roundabout). The site is central to the strategic highway network which includes linking to Junction 26 of M1 for connections to the south and north, near the A50 to the west and A610 to the east.

It is also strategically important for freight though Bennerley is not likely to be required for container handling as other SRFIs are planned for the East Midlands. The site is situated near a number of towns such as Eastwood, Heanor and Ilkeston. Nottingham is just nine miles away and Derby is 11 miles from the site, so offers a good geographical catchment area. The location is at the heart of the classic railway network, with good connection to the rail network in all four directions. It is situated on the Sheffield to Nottingham line, which is the main direct railway link between the East Midlands and the North of England.

The site is located between the recently completed Ilkeston station to the south and Langley Mill to the north. The alignment at this point consists of three (formerly four) lines comprising a set of main up/down lines, and a bidirectional line mostly utilised by freight services. Trains can operate from Toton or Nottingham (via Lenton Junction) in the south to and from Chesterfield (via Clay Cross) or Mansfield (via Pinxton) in the north. None of the lines are electrified.

The site is also located four miles from the proposed route for HS2, and in particular near the junction between Toton and the northern route to Sheffield. As such this demonstrates significant value as a potential support site for railway construction use, not only during the construction stage of Phase 2B and then the ongoing maintenance of the route**. Figure 4.1** shows the Midland Main Line route, and Bennerley is between Langley Mill and Nottingham.

Figure 4.1: Bennerley' s location on the Midland Main Line

4.3 Rail network capacity

Currently a number of passenger and freight services are scheduled to utilise the section of route adjacent to the colliery site. Regular passenger carrying services operate on two axes; from East Anglia/Norwich to the North West of England – Liverpool (East Midlands Trains), and from Nottingham to Leeds via Sheffield and Barnsley (Northern – Arriva Rail North).

Both these services operate generally hourly during the day, with some short workings and peak time additional services. Ilkeston station itself is served by the Northern service and selected Norwich-Liverpool East Midlands services. In addition to these regular services, there are a number of London St Pancras-Leeds (and vice versa) services that pass adjacent to the site non-stop during the AM peak and late evenings. A number of Empty Carriage Stock (ECS) workings also pass the site, operating to and from locations such as Liverpool, Worksop and Mansfield Woodhouse from Nottingham.

There are a significant number of freight services that are pathed to pass by the site. Many of these operate to/from or via Toton (often for crew or locomotive changes or layover). Commodities primarily transported include limestone and limestone products from the Peak District, although there are also flows of petrochemicals, steel, and departmental freight. Coal traffic, in former years represented a significant proportion of freight traffic in the area, has declined very significantly. Whilst these paths may be significant in number on certain days, the number of actual paths utilised can vary significantly.

Many rail lines in the East Midlands are operating at full capacity and this effectively prevents new services commencing on these routes. Importantly, the Bennerley site location is connected to one of the lines in the East Midlands, which has substantial spare capacity for additional rail movements on the Sheffield to Nottingham line as traffic accessing Bennerley from across the wider network will concentrate onto that line. Having a slow line allows faster passenger services to bypass freight trains.

Looking forward, there are no significant planned changes to the level of passenger services operating past the site. The Northern service will be diverted to operate via Moorthorpe rather than Barnsley which may result in alterations to timings (but not overall utilised capacity). HS2 Phase II as planned will lead to changes to the East Midlands Trains East Anglia to North West service (it being diverted via the new station at Toton). Again however, there is no expected changes to overall utilised capacity on the route. The construction of HS2 and the new Toton station will have a significantly greater impact on freight services in the area. There may be changes in routing away from the line past the site as a result of the change in importance of Toton as a hub for freight operations. Conversely however, the construction of HS2 may have notable impacts upon line capacity as a result of the amount of infrastructure trains required.

4.4 Site Size and Layout

The site is well-sized and would be suitable for the developments, as it does offer an attractive, rectangular shaped plot of vacant land, 44 acres in size. The rectangular shape is important in that it enables longer trains to be accommodated within the site without splitting. It is envisaged that the most likely track layout could be similar to that used in the past. The layout kept rail movements completely separate from road movements and as such this provides a safe operating environment.

The site comprises the former operational land in a former coal terminal land ownership. There is opportunity for some built space for B2 use. This could include manufacturing facilities, storage areas, service yards and ancillary offices.

The site is based on the level, with the potential rail siding(s) coming in from the Erewash River end of the site. It is likely that rail operations would be partially hidden from the view from nearby housing, reducing their impact on the surrounding countryside.

The likely arrangement would probably only permit access for trains to and from the south, as trains to and from the north would have to reverse into or reverse out of the site onto the main line, which would generally not be acceptable for a “new” connection to Network Rail. The existence of Toton Yard five miles away could allow a train from the north to run past the site to Toton, where the loco could then run round and haul the train back into site. This type of activity would need to be built into the wider Toton HS2 remodelling plans.

There would need to be sufficient siding space inside the site boundary to cater for any train and associated shunting. The area within the site provides around 500m of siding into which trains could be shunted to and from site without touching the main line itself. It may be that adjoining plots could offer sufficient length to stable a maximum length (750m plus loco) train. This is not essential and depends on likely future use.

4.5 Site Availability

Currently the only body able to approve new connections to the rail network is Network Rail, and the process for this can take a significant element of time. By the time that the process has been followed for developing a rail connection including planning, funding allocation, projects prioritised and capacity to implement the works identified, it can often be several years after the initial impetus, that the connection is finally made. Importantly as even a reinstated connection can take some time in the planning and build process, it is important to consider the potential and start discussions with Network Rail at an early opportunity.

Examples of timings are the developments of Parkside and East Midlands Rail Freight Interchanges. The former was first conceived in 2002 with detailed feasibility only undertaken within the last two years. It's estimated that the timeline for completion is at least another 5-10 years. The latter, East Midlands terminal similar to Radlett and Slough Strategic Rail Freight Interchanges (SRFIs) have a 10 year timeline to expected completion. Whilst this isn't solely down to the rail connection, this and other issues such as site clearance, also not required at Bennerley, contribute to the business case and delay vitally needed infrastructure.

As there have been doubts about Network Rail's ability to deliver the large number of projects it has scheduled for this investment period, Control Period 5 (2014 – 2019) there is increased uncertainty as to how long it would take for a new site to be connected to the network. However with engineering work connected to the development of HS2 likely in the next decade it is sensible to incorporate Bennerley into the bigger picture for the area.

4.6 Junction Reinstatement

The fact that the Bennerley connection and signalling to the national rail network was removed in 2008 means that an indicative cost of around £2-£3 million (subject to engagement with Network Rail) will be needed to reconnect to Network Rail's slow up and down line. However on the positive side the track bed and alignment for this connection are still available and would require little refettling to bring back into use. Also the fact that the slow line is a bi-directional track allowing two-way movements means operationally rail access is less complicated.

4.7 Rail Investment Projects

There are various stages of study required in the process called, Governance for Railway Investment Projects (GRIP) which describes how Network Rail manage and control projects that enhance or renew the national rail network. GRIP divides a project into eight distinct stages that cost money. Fees can vary depending on the circumstances found. It is a fact that internal works on a site are straightforward compared to live railway connection works.

4.8 Proximity to a trained and knowledgeable workforce

The East Midlands is the centre of rail manufacturing in the UK with the main Bombardier plant at Derby being the focus for train production. As such there are many skilled tradesmen in the area working not only in the main plant but in many support ancillary rail companies. 13% of all rail-related jobs in the UK are located in Derby, a city with a population of 250,000 which is just 11 miles from Bennerley. There has been good news for example new contracts for passenger carriages e.g. £1 billion Crossrail contract ensuring the main plant at Derby has a good backlog of work for the foreseeable future. There is also a brand new £12m test facility.

Similarly Toton yard has traditionally employed many railway staff mainly working in rail freight operations connected with the large marshalling yard which at its peak had over 40 sidings. Toton is home to one of the biggest diesel locomotive maintenance depots in the country, most recently serving DB Cargo. This facility carries out all levels of maintenance from regular safety inspections to major overhauls and requires a highly skilled workforce, trained in rail engineering, electronics, and much more.

With the HS2 plan to take over much of the Toton site for the new East Midlands hub station there is likely to be a need for one or two alternative sites to accommodate displaced railway activities. The advantage of using a site at Bennerley is that as it is only five miles from Toton it is within a reasonable commuting catchment area for existing staff. Therefore it is likely that Bennerley would be an attractive alternative employment site. Clearly the Local Economic Partnership (D2N2) would want to ensure no employment is lost to the area from

new developments, indeed it is looking to attract modern high value work to the vicinity. Increasingly new railway jobs are highly skilled, technology based and are just the type of future work required to support a growing community. Combining the best of traditional rail engineering skills with new opportunities could be facilitated at Bennerley. It is believed that most of the jobs created would be taken up by residents within a 30 minute drive of Bennerley and this includes central Nottingham and Derby.

4.9 Potential Demand

It is clear that there is a need for rail related sites to meet developments in the rail industry and this interest needs urgent deliverability given increasing demand. There is a significant need to develop sites that are suitable for the construction and/or maintenance of both rail infrastructure and rolling stock in order to meet planned targets and policy goals. In particular, there is a significant element of time pressure in developing a site so that it can meet the demands for near term projects such as HS2 or franchise rolling stock renewal programs. As such, suitable sites are required that allow for development immediately. Bennerley is a nearly ready to go site, needing to be reconnected to the national rail network but importantly located at the strategic heart of the existing and planned network.

There are a number of railway construction companies such as Carillion and VolkerRail who bid to Network Rail for contracts. This type of organisation needs operational depots in order to do their business. It is likely that successful contractors for the Midlands elements of HS2 railway construction will need facilities in the area and Bennerley is only four miles from the proposed route of HS2.

Building suppliers such as Tarmac and Cemex are known to be looking for sites in the Midlands. In addition the Government's electrification programme aiming to reduce the climate change impact of the rail way is likely to need sites for contractors. So it is probable that two or three railway construction sites will be needed in the Midlands over the next five years to meet the needs of the growing market.

In terms of a train maintenance facility capable of serving either the freight or passenger markets, this could be of interest to at least five passenger operators, five freight companies, several rolling stock leasing companies all with operations in the East Midlands and possibly several train manufacturers. It is often with the letting of new train franchises that Train Operating Companies seek to establish new depots and place orders for new trains. It is likely that around three sites will be required for train maintenance in the next few years to cater for the growth in numbers of rolling stock. As passenger numbers are set to grow by 50% then extra trains are required.

There are known to be some train manufacturers looking for sites to erect manufacturing facilities in the UK. Although some of these have now preferred site locations, Bennerley could enable these companies to build their trains locally, contributing around 2-3 trains of the 10-12 required per week. Clearly there could be a need for up to four new sites nationally to cater for the biggest demand for new trains in 50 years.

If the potential demand for all three types of rail activity above is accumulated there could be a need for up to 10 new sites nationally over the next 10 years (this is shown in **Table 4.2**). As the East Midlands is centrally located and known to be the "Home of Rail" the region should be well placed to capitalise on the economic benefits this railway renaissance brings. Bennerley can play a part in fulfilling this opportunity.

Table 4.2: Requirement for Suitable Sites

Potential Uses of the Site	Estimated Rail Market Need
Railway Infrastructure Construction	2 – 3 new sites
Train Maintenance and Refurbishment	3 new sites
Train Manufacture	4 new sites
Total Requirement for New Sites	**10 Sites**

4.10 Summary

In this section we have discussed the Bennerley site attributes and confirm that;

- The site is at a good geographic rail location in Central UK with southbound connection to the “Classic” rail network and HS2 at Toton
- There is good road access to the A610 / M1
- There would be train paths available to/from the site on the rail network
- The site and shape is suitable in terms of operational practicality
- The site is relatively available; and alignment for track relaying is suitable
- Reinstatement to the mainline would be required
- There is a very skilled labour pool nearby which is centred on the UK rail sector in Derby which is within suitable commuting time (less than 30 minutes)
- There is potential demand connected to the rail sector that this site can fulfil and there is urgent need for sites to be brought forward for this.

5. Policy Review

5.1 Introduction

The Section outlines the current policy framework regarding passenger and rail freight and demonstrates how these policy goals are already resulting in demand that is currently unmet. Consideration is given to policies surrounding passenger and freight rail movements.

The classic UK rail network is going through a period of renaissance apart from the well-publicised schemes such as Crossrail 1 & 2, the Northern Hub and HS2.

5.2 Passenger Market

Analysis in 2015 by the Rail Delivery Group (RDG), which represents train operators and Network Rail, and is based on data from the auditors KPMG found that people make an average of 24.7 train journeys a year, a 60% increase from 1998, when private operators took over running UK train services from British Rail. The growth in journeys is faster than in France at 25%, Germany at 23% and the Netherlands at 10% over the same period.

This growth in rail passengers is causing serious levels of overcrowding on certain routes. London commuter trains are often quoted as some of the most overcrowded but it is not just the capital.

To address this, Transport Focus, the rail sector's passenger watchdog called for more investment to increase space for passengers. David Sidebottom, Passenger Director at the independent watchdog, said in an article for the Guardian newspaper in 2015:[7]

"We know that only about half of commuters are satisfied with the amount of room they have to sit or stand on their journey. We have long called for the rail industry to deliver the much-needed increase in capacity. This will require continued investment in new and longer trains to meet existing demand, as well as ensuring that overcrowding doesn't get worse as passenger numbers increase."

Responding to the figures, the Department for Transport stated that it was renewing its commitment to provide more seats and services across the rail network.

"I know how frustrated customers are with overcrowding and I expect the rail industry, including operators, to continue to develop innovative proposals to meet the capacity challenge head on."

However, the industry has already done much to improve the situation, Edward Welsh, a spokesman for the Rail Delivery Group, said the rail network was better able to serve passengers and businesses because of its transformation over the past two decades into what he called a great British success story. He said:

"Crucial to this success has been the partnership between the private and public sectors, working together to deliver better value to passengers, freight customers and the nation. There is much more we need to do to improve services for our customers. Our greatest challenge is to plan and build for the ever growing demand for rail by increasing capacity cost effectively and generating revenue to support investment in more and better services."

[7] (Source: https://www.theguardian.com/uk-news/2015/sep/09/government-names-overcrowded-train-journeys-rmt)

Indeed, the government and private industry are investing in the railways to deliver a generational change, creating a network and services fit for the 21st Century using new technologies and innovative ideas. The future of the rail industry must be one in which it uses this era of opportunity to become ever more customer focussed. Passengers want reliable, frequent and fast services in comfortable trains with modern features. Everyone who works on the railway, from frontline customer facing staff to train drivers, signallers, telecoms experts and others need to be given the skills to make new rolling stock and signalling equipment work for passengers.

But government wants to see Train Operating Companies (TOCs), and Rolling Stock Companies (ROSCOs), manufacturers and suppliers doing much more in the years ahead, investing for themselves, taking their own risk-based decisions on procuring the train capacity needed now and in the future. The competition for new trains that HS2 Ltd has launched in 2017 provides a great opportunity for manufacturers and designers to show that they can realise the vision for a state-of-the-art, high-speed rail network of the future. For conventional services the message is to use space as efficiently as possible, to reduce crowding on intercity, regional and outer suburban journeys and, on shorter distance journeys allow passengers to travel in reasonable levels of comfort. The government is looking for innovation and creative thinking to address the challenges of capacity, including options such as double deck trains and seat layouts that can be quickly altered according to changes in demand.

5.2.1 Passenger Rail Policy Documents

The rail passenger business structure in the UK, typically consists of manufacturers, leasing companies (ROSCOs) and Train Operating Companies (TOCs, franchise operators) who are awarded contracts to deliver services on a set route for normally 7-10 years. This section discusses the rail passenger market and how the sector is rapidly expanding in response to record passenger numbers.

5.2.2 Passenger Rail Usage

The rail industry has been undergoing a transformation since privatisation in 1990s. The number of train journeys made each year has more than doubled since the late 1990s and according to ORR (Office of Rail and Road) Statistical Release in May 2016, passenger journeys in Great Britain reached 1.69 billion in 2015-16. This is the highest recorded figure since the series began and an increase of 129.8% from the 735.1 million recorded at privatisation in 1994-95. Franchised passenger journeys saw an increase of 2% on the 1.65 billion recorded in 2014-15 as can be seen in **Figure 5.1** below.

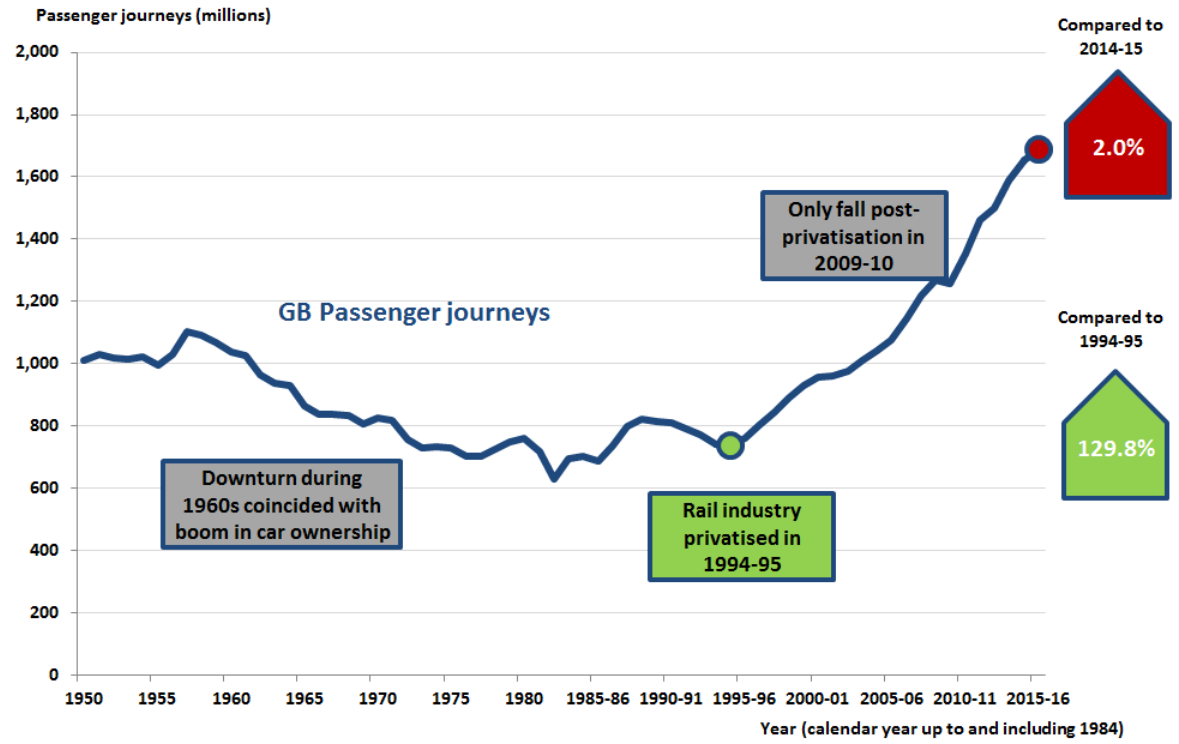


Figure 5.1 Rail Passenger Journeys (Source ORR)

There are several other key performance indicators in the rail passenger market and all of these are showing upward trends and all are the highest recorded figures since data was first collected in 1986-87.

- Passenger kilometres totalled 64.4 billion.
- Passenger revenue totalled £9.3 billion an increase of 4.7% compared to 2014-15.
- Passenger train kilometres for all operators have increased every year totalling 521.8 million in 2015-16.

Such growth as well as the environmental benefits of rail travel over road means that policy at all levels is focussed on enabling the growth to continue.

The following sections outline key policies from international, national, regional and local level as follows:

5.3 European Policy

The 2011 EU Transport White Paper provides a roadmap to reducing the continent's dependency on carbon based fuels and therefore consequential transport emissions by 60% by 2050. To achieve this, it recommends tripling the length of the existing high-speed rail network by 2030 so that, by 2050 the majority of medium-distance passenger transport should go by rail, high-speed rail should outpace the increase in aviation for journeys up to 1000 km. All airports should also be rail connected (preferably by high speed rail).

Such aspirations clearly indicate the need for a network of infrastructure to support the construction of rail throughout Europe. The growth in rail usage and networks also increases the need for new rolling stock and associated maintenance facilities. These will require strategically located, rail connected sites across the network.

5.4 National Policy

5.4.1 National Policy Statement for National Networks:

The NPS has recognised the growing market in passenger rail and the need of modal shift in the UK transportation system. A total of 60 billion kilometres and 1.6 billion journeys were undertaken by rail passengers on the network in 2013/14. Passenger demand is predicted to continue to grow significantly. A total demand growth of 50% by 2033 was estimated based on current GDP trend forecasts and fares policy. To address the growing demand of rail markets, policies are being implemented and considered across government.

Some of this growth can be accommodated by making more efficient use of the existing railway infrastructure and rolling stock, such as by running more or longer trains, or encouraging passengers to travel at less congested times of the day. Signalling and power supply improvements, and more modern electric rolling stock, as well as providing a more comfortable and reliable passenger experience are all thought to assist. There is a need to support measures that deliver step change improvements in capacity and connectivity between key centres, by speeding up journey times and encouraging further modal shift to rail.

Finally, to reduce rail's environmental impacts, the Government's strategy is to provide for increasing use of efficient and sustainable electric trains for both passenger and freight services. The environmental performance of the railway will be improved by continuing to roll out a programme of rail electrification. To reduce the risks of passenger and workforce accidents, the government will consider the introduction of new technologies and risk management techniques to improve safety performance in a more efficient and cost-effective way.

5.4.2 Department for Transport 2016 Passenger Rail Strategy:

The UK government sees rail as vital to the UK's economic prosperity. If rail services are inefficient and do not meet people's needs for routing or frequency, business and jobs suffer. Rail links with airports and ports are business opportunities for travel, tourism and the transportation of goods. They are also continuing to encourage people to use trains rather than cars, as well as reducing carbon emissions from trains and stations themselves, reducing carbon fuel usage and associated emissions, in line with European policy.

To facilitate this growth, the government has indicated investment across several aspects of the railway to extend and upgrade the UK rail network, the vast majority of which is shared by both freight and passenger services. This includes[8]:

- Electrify and upgrade so that nearly three quarters of passenger traffic is on electric trains
- £38 billion of upgrades of existing stations and track to increase capacity with an extra 140,000 commuting journeys each day into our key cities
- Complete Crossrail and Thameslink, with new trains and a strong network of new routes
- Introduce brand new intercity trains on the East Coast and Great Western routes
- Complete the Northern Hub – a large programme of electrification and capacity works right across the north

[8] https://www.gov.uk/government/publications/2010-to-2015-government-policy-rail-network/2010-to-2015-government-policy-rail-network

This is in addition to the HS2 programme to bring high speed rail connections to the Midlands and North of England. Such expansion again implies the need for a network of supporting infrastructure to enable the roll out of new rail connections and rolling stock such as rail track construction and maintenance depots, rolling stock manufacture and complimentary rolling stock maintenance sites.

In December 2016, the Department for Transport announced proposals to alter the way the network is run, with the private sector taking a greater role in the construction and maintenance of infrastructure as well as the operation of rail services. The implications of this will become clearer in the near future but could lead to greater demands for track maintenance infrastructure required by different private operators rather than a single operator in Network Rail, meaning additional sites may be required.

5.5 Summary of Passenger Rail Policy

Policy at all levels clearly indicates the need to address the rapid growth of rail passenger demand, as well as the need to promote modal shift from cars to more sustainable forms of transport, primarily rail, for medium and long distance journeys. High Speed rail also has a role to play in replacing aviation for short to medium haul flights. To realise this, significant infrastructure development as well as new rolling stock is required across the UK, The DfT is engaged in a significant investment programme for both its conventional and high speed infrastructure.

Additionally, the UK's rolling stock is aging rapidly and considerable investment in its renewal is underway. All of these aspects require support from the regions and the East Midlands; at the centre of the country has a long history of providing modern, well maintained rail assets. Such plans affect Nottinghamshire directly, especially given its proximity to the planned HS2 route.

5.6 Freight Policy Documents

In the UK, the current trend in terms of total rail freight tonnage lifted over the past twenty years has been negative (see **Figure 5.2).** This decline has been brought about mostly due to structural changes in the UK's heavy industrial sectors and recently the decline of coal as a result of changing power generation methods towards less polluting alternatives.

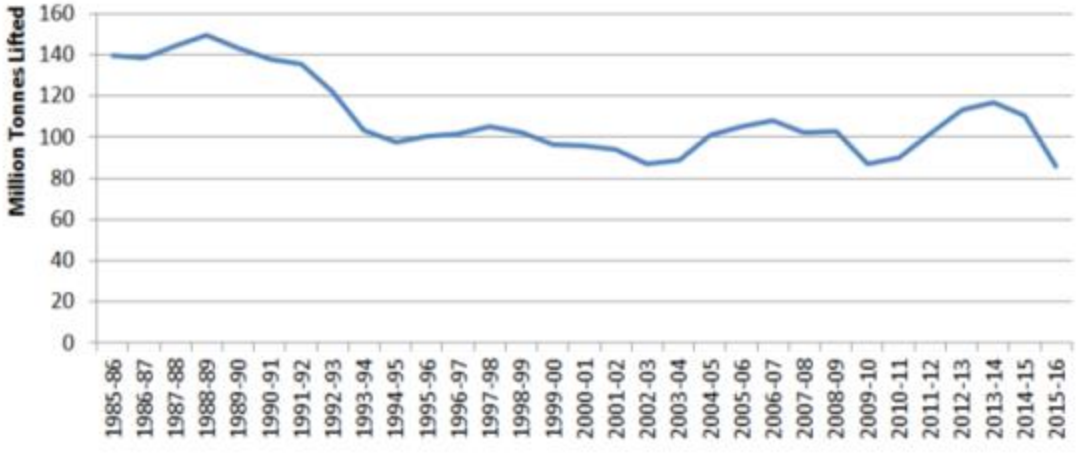


Figure 5.2: Freight Tonnes Lifted 1985 - 2016

As a result, there is an ambitious policy framework to try and increase rail freight by making good use of embedded resources, such as locomotives, wagons and existing terminals. This

section provides an overview of the existing policies in place from European level down to the local authority, as well as incorporating insights from recent academic papers on the subject.

5.6.1 European Commission

The European Commission has stated that by 2030, 30% of all road freight journeys over 300km should be switched to more sustainable modes, and that this should increase to over 50% by 2050 [9]. This ambition is framed in that as distance increases the advantages of rail freight increases commensurately; short "hops" are unlikely to ever shift mode due to the cost of transhipment operations if the final destination is not rail connected [10]. Another stated ambition of the EU roadmap document is to ensure that all core seaports are connected to rail freight to increase the modal share of movements by rail from ports to the goods' final destination. This will need an increase in the capacity of the railway industry for freight movement.

5.7 National

The UK Government also has stated clear, unambiguous goals to grow rail freight in absolute terms as well as to increase its modal share across a range of sectors. This has been codified in a number of recent documents as follows:

5.7.1 DfT Rail Freight Strategy[11]

The Rail Freight Strategy sought to reflect the Government's thinking upon the future of rail freight, incorporating the Freight Carbon Review and the Government's emission reduction plan. The former document seeks to reduce the contribution of road freight movements to emissions, including through increased use of rail freight terminals for a number of commodities, where capacity is required, particularly for the non-container sector. As such this will require significant refurbishment of existing rolling stock to enable this increase or to refurbish coal wagons to enable them to carry alternative commodities.

5.7.2 National Policy Statement for National Networks

This document sets out the Government's policies regarding significant rail infrastructure projects in England. The NPS recognises that railways are a vital part of the UK's transport infrastructure. Specific to freight and in the context of the Government's vision for the transport system as a driver of economic growth and social development in the UK, it states the railway network must:

> *"…provide for the transport of freight across the country and to and from ports, in order to help meet environmental goals and improve quality of life."*

Whilst the main focus of the policy is on the development of Strategic Rail Freight Interchanges (SRFIs) such as Four Ashes, Daventry International Rail Freight Terminal (DIRFT), and East Midlands Gateway which are suited to cater for containerised intermodal traffic, this also applies to other commodities not served by these rail interchanges such as bulk flows and rolling stock or infrastructure applications.

5.7.3 National Planning Policy Framework (NPPF)

The NPPF echoes the national documents which state the role that rail freight could play in the reduction of greenhouse gases:

[9] EC, *Roadmap to a Single Transport Area* (2011)
[10] Bottani & Rizzi (2007)
[11] DfT, *Rail Freight Strategy*, (2016)

> *"Local authorities should work with neighbouring authorities and transport providers to develop strategies for the provision of viable infrastructure necessary to support sustainable development, including large scale facilities such as rail freight interchanges"*

This presumption in favour of supporting the development of rail freight interchanges, whilst not directly applicable to Bennerley, is relevant as the lack of suitable terminals was identified by the DfT (see DfT Market Review and Modal Shift Assessment below) as one of the key barriers to the wider adoption and expansion of rail freight across a number of commodities. As this barrier is removed, there will be a resultant increase in demand across a range of commodities, all of which will utilise these new terminals (the track construction plant) and new or converted rolling stock.

5.7.4 Carbon Budgets

The Climate Change Act established a target for the UK to reduce its emissions by at least 80% from 1990 levels by 2050. This target represents an appropriate UK contribution to global emission reductions consistent with limiting global temperature rise to as little as possible above 2°C

To ensure that regular progress is made towards this long-term target, the Act also established a system of five-yearly carbon budgets, to serve as stepping stones on the way. Part of the national effort to reduce freight's contribution to carbon emissions is the move from road to rail, as supported by HMG's carbon budgets

5.7.5 Network Rail Freight Network Study (April 2017)

Network Rail Freight Network Study states that the most important aspect of freight planning on the railway in the East Midlands, moving forward, will be to continue gauge clearing the route so that commodities can develop and grow to replace the decline in coal traffic of recent years – as laid out in the DfT Freight Market and Modal Shift Review (2016).

5.7.6 DfT Market Review & Modal Shift Assessment

The Department for Transport (DfT) commissioned the report to understand the future growth potential in the UK rail freight market, in particular the scope for modal shift from road to rail. One of the key supporting documents for the Rail Freight Strategy which identified a lack of terminal capacity, in particular for growth commodities including domestic intermodal, construction material and other bulk traffic as a key constraint on rail freight growth.

5.7.7 HM Government (2017) Building our Industrial Strategy Green Paper

This Green paper has been written to set out the UK's new industrial strategy in the wake of the decision to leave the European Union. The strategy is designed to improve living standards and economic growth by increasing productivity and driving growth across the whole country. The strategy is divided into 10 pillars to drive growth across the whole country and infrastructure has been identified as one of the 10 core pillars. This will include digital, energy, water, flood defence and transport infrastructure. It identifies that the quality of UK infrastructure has been rated second lowest within the G7 and World Economic Forum surveys have identified that our overall infrastructure falls behind that of our competitors.

5.8 Local and Regional Level

5.8.1 Midlands Connect Freight Strategy

The Midlands Connect Freight Summary Overview document (2017) clearly lays out the region's ambitions to accommodate the growth of rail freight across the region:

"Our broad objective is to provide capacity to allow new rail freight to develop alongside the expected growth of passenger services."

This would support not only the maintenance and protection of existing freight paths in the timetable (where relevant) but also the support for new rail-linked terminals, as the absence of these terminals has already been identified at a national level as a major constraint on the growth and accessibility of rail freight (see DfT Freight Market and Modal Shift Study, 2016).

5.8.2 D2N2 LEP - Freight Action Plan (2015)

The Transport and Logistics Action Plan produced by the D2N2 Transport and Logistics Working Group was set out around the themes of the D2N2 Strategic Economic Plan of

- Business Support and Access to Finance
- Supporting the Transport & Logistics Industry
- Innovation, Knowledge Transfer
- Productivity and the Low Carbon Agenda

In particular under the Business Support theme, the changing nature of retailing patterns are altering the type and location of properties needed by the sector. This is of direct relevance to this site in particular with the local planning authority (Broxtowe Borough Council) as and when a planning application comes forward.

5.8.3 Network Rail East Midland Route Study (2016)

Network Rail's East Midlands Route Study notes the importance of accommodating forecast and expected growth on rail freight across the region, both in terms of freight starting and ending its journey in the East Midlands, but also in terms of its strategic importance as a corridor for a significant part of the UK's rail freight, with almost 10% of national freight traffic passing through (forecast to rise to 13% by 2043).

5.8.4 Nottinghamshire Local Transport Plan (2011- 2026)

Nottingham County Council is supportive of shifting freight from road to rail and barge "wherever possible", including through supporting the provision of rail connections to factories, quarries, etc. where they can be "practicably served" in order to reduce the number of HGVs on the county's road network. This provision is supported in the implementation plan, both through the development of a Freight Strategy for the county and also through close-working with freight operators to encourage modal shift where suitable. Bennerley provides a "ready-made" site, in the sense that a connection to the rail network has been demonstrated to be eminently practicable in this location, with minimal requirements for earthworks and can use the existing alignment.

5.8.5 Broxtowe Core Strategy (Part 1) and Local Plan (Part 2)

The Broxtowe Local Plan (Core Strategy) is particularly supportive for rail in terms of development, as it has a vision for the region stating that it will "[provide}…a range of suitable sites for new employment that are attractive to the market especially in terms of accessibility, environmental quality and size, particularly where it will assist regeneration. Wherever feasible, rail accessibility for storage and distribution uses should be utilised." Bennerley as a location is well-suited to providing such a facility in terms of its historic rail connection and its location between Derby and Nottingham for distribution purposes.

5.8.6 East Midlands HS2 Growth Strategy (2016): Emerging Strategy: Fast Track to Growth

This document prepared by the East Midlands Economic Strategy Area of D2N2 LEP, Leicester and Leicestershire LEPs identified as one of the emerging priorities was the re-modelling of Trent Junction to meet the long term passenger and freight requirements of both HS2 and Midlands Connect.

5.9 Summary

This overview of the European, national, regional and local policy framework demonstrates a clear need to develop sites such a number for rail uses in order to meet the regional, national and international ambitions regarding increasing rail, reducing road traffic as a result, encouraging development and ensuring that rail continues to offer a good service across a range of industrial sectors for a variety of users. In particular sites which can support Network Rail's need to renew and refurbish the infrastructure or the need of train manufacturers, operators and ROSCOs for manufacturing and maintenance facilities. HS2 contractors are actively looking for sites in the vicinity.

Given this desire, the relative merits of an opportunity to develop a site with existing rail connections and road connections should be explored, especially as its development will support the development of the East Midlands Rail Cluster.

6. Proposed Development Options

6.1 Introduction

In light of the factors discussed earlier, there is huge demand for rail connected sites in order to facilitate the growing demand for rail both passenger and rail freight. This chapter assesses whether the site is suitable for three principal rail uses. These are:

1) Rail Manufacturing and Construction Site
2) Train Maintenance Facility
3) Rail Connected Warehousing

These uses are closely related and similar in nature and are all growth areas serving the rail industry expansion. As such there are some common themes that run through each of their operational and layout requirements. These are demonstrated before going on to assess the uses separately, where any important differences from these initial outlines are discussed. Details regarding an indicative layout of the site for the various uses are identified.

6.1.1 Commonalities

The following section outlines features that apply equally to each of the potential uses of the site.

The site covers approximately 44 acres in size, and is a rectangular shaped plot of vacant land with existing track beds and alignments but no active railway connection. The topography of the location is level but with sufficient space to allow for clear separation between road and rail movements. A road offering direct connection to the A610 is in situ, enabling good access to the strategic road network as well as cycling and pedestrian access to Shilo way.

A single siding application means that the rail manufacturing applications (1 & 2) will be of common layout including a single indoor manufacturing/maintenance facility as well as some provision for outdoor storage.

Developing the site in this way with room for expansion will enable current and future demand to be met on the existing footprint, without future requirements for significant earthworks or other intrusive development.

The site would operate on a 24/7 basis and hence would have a proportion of staff working on shifts as this is the most economical way to run operations of the nature. For example, the Hitachi train manufacturing site in Newton Aycliffe, County Durham will work in three shifts as production accelerates. This spreads journeys to work throughout the day rather than having peaks at traditional rush hour periods (say 8am and 5pm). The site would have appropriately sized employee parking areas depending upon the number of employees. There would be a security fence and gatehouse to monitor and control vehicle movements.

It is anticipated that any manufacturing B2 or B8 type building would be built to modern standards. There could be some support buildings and a vehicle handling area. Establishing a rail sector based industrial activity means that a significant proportion of inputs can be brought to and from the site by rail. The third potential use will be different, requiring both road and rail solutions.

The environmental credentials of promoting rail over road journeys are well documented. Although it is recognised that with any development there may be sensitivities relating to the site and concerns of local residents around traffic, noise and visual impacts on the surrounding communities, the proposed uses outlined will look to minimise all of these, by providing options that maximise the use of rail for freight as well as cycle routes for

commuting therefore limiting the need for road access. Buildings will also be designed to reduce visual intrusion were practicable. The majority of this work will take place at the Western area of the site, away from the most noise sensitive areas around the residential development and the new Awsworth housing promotion.

The majority of noise generation will take place indoors. The hard standing will also allow wheeled, rather than tracked vehicles to be used mitigating noise further. The site will also have strict operational policies and training for all staff working at night in minimising the creation of noise as part of a noise management plan. Additionally, railway maintenance largely takes place overnight. As such, given the use of the site, the majority of loading and unloading will take place during the day, for example allowing engineering trains to be at their destination in time for railway maintenance possession to start.

6.2 Railway Manufacturing and Construction Site

Depending on the needs of Network Rail or a railway maintenance company such as Carillion, the site could concentrate on the assembly of prefabricated track panels or production and assembly of sleepers and rail fasteners as per the modern way of track installation in which sleepers, track and fasteners are installed by a single machine, greatly speeding up the time taken to construct and replace rail networks.

Photograph 6.1: Track Laying

The exact layout of the site will vary depending on the nature of manufacture and the developer's individual requirements; however, it is possible to demonstrate indicatively the likely nature of such a site and how it is achievable within the boundary of the site

The site is likely to have built floor space within the B2 Class. This would be made up of the sleeper/track manufacturing plant and ancillary office space. The design of the building will be developed in a way that minimises visual intrusion. **Photograph 6.2 and 6.3** shows examples of what could be achieved depending on requirements and budget.

Photograph 6.2: Visual Impact Reduction

Photograph 6.3: Visual Impact Reduction

The manufacturing as well as office space will be positioned at the western end of the site, furthest away from residential areas and adjacent to both the road access and rail sidings.

Extending along the northern boundary of the site, between the rail siding and road, some hard standing as well as open storage will be created for the ancillary storage of supply materials and finished goods to and from the factory as well as raw materials and prefabricated

equipment directly for use of the rail such as aggregate respectively and allowing easy handling to and from the train. Hard standing will also surround the facility, providing stable ground to enable the use of loading and unloading equipment. Such equipment may include the use of excavators as well as cranes. Flatbed vehicles and tippers may also be needed to move product around the site though these will not leave the premises onto public roads.

Figure 6.1 shows a possible layout for the site. This is indicative as to the size and location of buildings.

Symbol	Name	Description
	**Hardstanding**	Developed along the length of the sidings and surrounding the manufacturing plant to allow for train loading and unloading of commodities.
	**Storage Areas**	Used for the storage of commodities – may need to be covered/secure dependent on use. Sites can also be combined for a larger tenant
	**Offices/Ancillary Buildings:**	Main offices for management and administration of site operations. Could also include a visitor's centre/classroom functionality if required.
	**Manufacturing Site**	Area used for the manufacture of commodities, dependent on site usage, may or may not be directly rail linked.

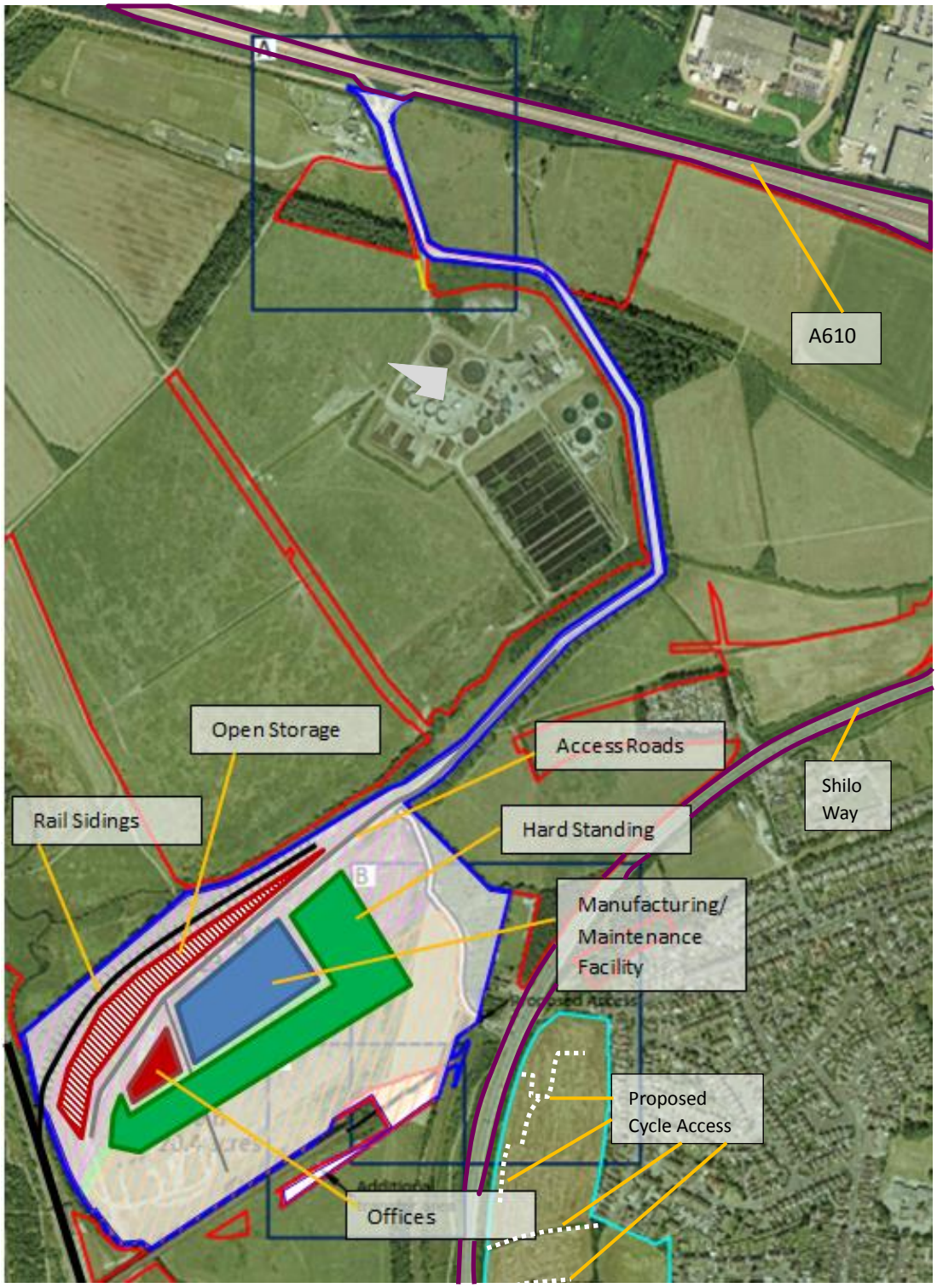


Figure 6.1: Railway Manufacturing Facility

6.2.1 Employment

The site should create around 50 jobs and could be one of several sites that are required across the UK for both rail maintenance/manufacture or electrification of rail lines. Such facilities are regionally based due to the slow speed of rail construction trains. Such a layout is provided in **Figure 6.1**, it should be noted that this is not definitive in terms of size and location and indicates an interpretation of the extent of possible options; not all of the layout may need to be built.

6.2.2 Operating Hours

Whilst the factory would operate on a 24 hour basis, the loading of train wagons would likely occur between 07:00 and 18:00 on weekdays as periods of railway maintenance are most often overnight or at weekends. The shunting and arriving/departing of trains will be 24 hours a day, seven days a week

6.2.3 Traffic Generation

The site would likely generate 25-30 trains per week, moving mostly in the early afternoon to travel to the construction site in time for occupation.

In terms of HGV traffic, around 5 vehicles per day are expected and around 50 cars allowing for permanent employees and visitors.

6.3 Train Maintenance Facility

A diesel train maintenance facility (the line is currently not electrified) could include a range of activities from train washing, upgrade and refurbishment of interiors to rail engineering with the servicing and repair of train components and create 100 jobs and be able to maintain 3-6 trains per night or more if just providing light servicing facilities. A mobile crane/reachstacker (photograph 3.3) may be required in order to move rolling stock on and off the track or this could be done via or gantry crane a bar crane (a type of crane fixed to the roof of a building as opposed to having its own supports) extending outside the building. The hard standing will also provide stable ground to enable the use of loading and unloading equipment. Such equipment may include the use of flatbed vehicles and cranes to move product around the site though these will not leave the premises onto public roads. **Figure 6.2** shows a possible layout. This is indicative as to the size and location of buildings. The level of vacant land can also offer possibilities for expansion.

Photograph 6.3: Example of a reach stacker

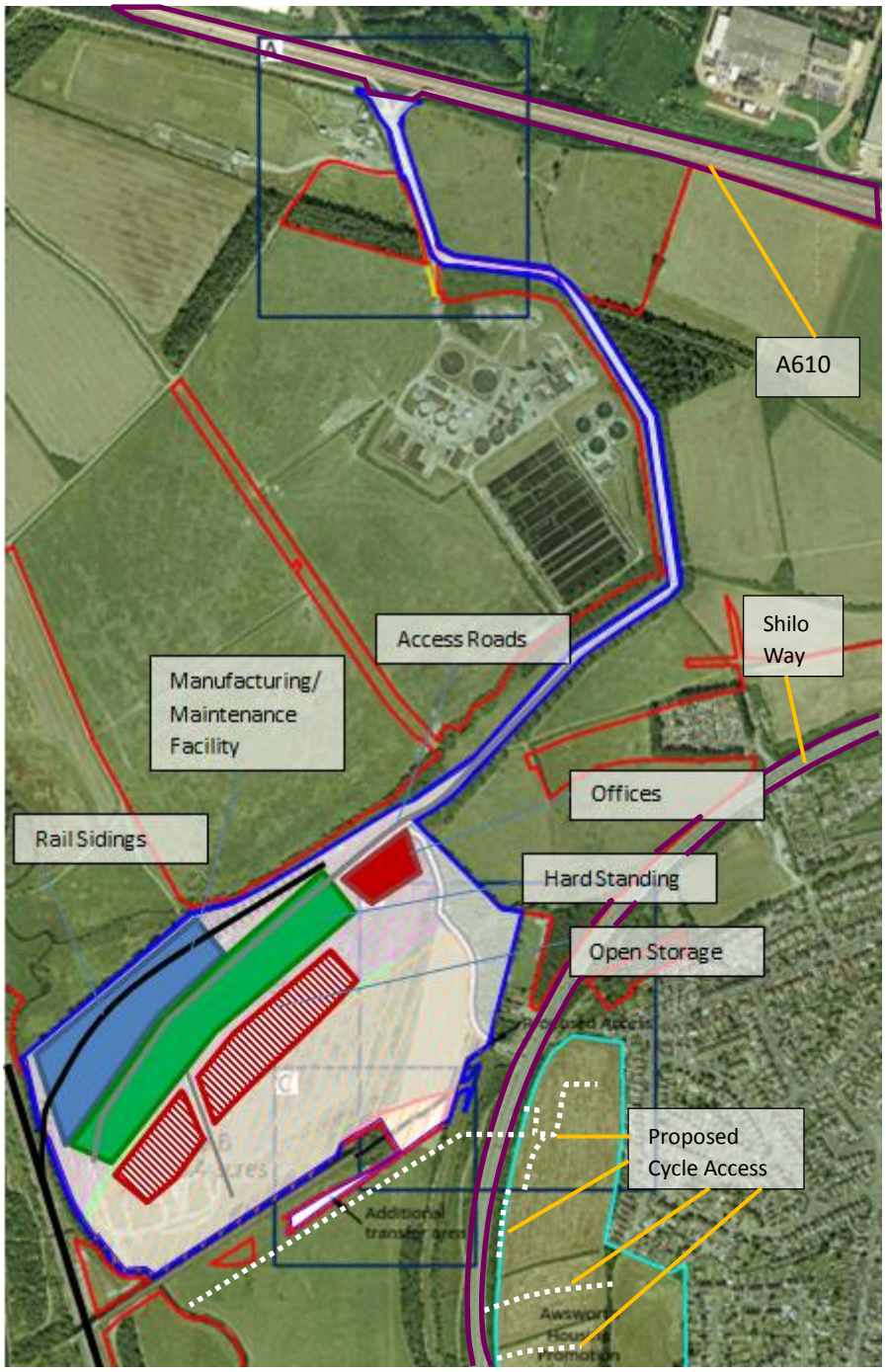


Figure 6.2: Rail Maintenance Facility

Symbol	Name	Description
	**Hardstanding**	Developed along the maintenance facility to allow for train loading and unloading.
	**Storage Areas**	Used for the storage of commodities – may need to be covered/secure dependent on use. Sites can also be combined for a larger tenant
	**Offices/Ancillary Buildings:**	Main offices for management and administration of site operations. Could also include a visitor's centre/classroom functionality if required.
	**Manufacturing Site**	Area used for the assembly of components, dependent on site usage, may or may not be directly rail linked. Could also be combined with maintenance zone.

Existing infrastructure including the existing site vehicular access, alignment of the rail head and sidings, would be renovated and made operational to serve B2 employment uses. Existing surface water drainage infrastructure, including the culverts, settlings lagoons and attenuation ponds need to be retained and reconfigured.

Trains would access the site through the disconnected connection to the mainline. The area previously used for sidings could be used to provide stabling facilities. The potential sidings would be long enough for several multiple units to be stabled simultaneously; therefore rakes from passenger service would not need to be split for maintenance. The majority of any noise generating work would take place indoors to mitigate noise disturbances.

The majority of this work will take place at the western area of the site, away from the most noise sensitive areas around the current residential areas and the Awsworth Housing Promotion. The majority of noise generation will take place indoors. The site will also have strict operational policies and training for all staff working at night in minimising the creation of noise as part of a noise management plan. Additionally, train maintenance largely takes place overnight, as such, given the use of the site, the majority of loading and unloading of parts will take place during the day.

It should be possible to site the noisiest aspects of the maintenance work (depending on the level of maintenance undertaken) on the site in such a way as to minimise their impact. Furthermore, operational parameters can be set to reduce train noise from horns and air conditioning units, whilst enclosures around train washing and wheel lathe facilities will minimise noise.

Lighting will similarly be designed, although Network Rail guidance will result in some mast lighting where technical and safety reasons demand, such as areas with conflicting pedestrian/road and rail movements. It should be noted that the site layout will be designed to minimise conflicting movements. Lighting could however be directed where needed to reduce light spill and potentially be switched off when not required.

6.3.1 Employment

The site is expected to generate around 100 jobs across the site in three shifts, though it's likely that night shifts will be much greater in size

6.3.2 Operating Hours

The site would run 24 hours, the majority of work taking place overnight therefore maximising train availability during operating hours.

6.3.3 Traffic Generation

The vast majority of goods into and out of the site would be via rail and therefore the amount of vehicular traffic would be kept to a minimum number of HGV movements ranging between 5 and 10 per day. Cars will largely be for the transport of employees as public transport is currently unavailable for the site, and generate around 100 vehicles though this could be mitigated through the use of a works bus. The shift nature of the work will also negate the typical AM/PM commuter peaks seen with many other commercial developments.

Rail traffic is likely to be in the region of 5-6 per night given the number of sidings, though this may increase if it's used for train washing, fuelling or light servicing.

6.4 Rail Connected Warehousing

The costs of warehousing (rent and land values) in Derby and Nottingham are lower than in the nearby 'Golden Triangle of Logistics' which approximately is the area between Birmingham East, Northampton and Leicester, including Coventry.

Nottingham and Derby offer competitive rates compared to other locations in the Midlands however, they are not the cheapest. The lowest rents and land values in the Midlands are found in Stoke-on-Trent.

The following tables show the rental costs of warehousing space and land values for a number of locations in the Midlands. The costs are estimates based on the achievable open market rents in terms of gross internal area (GIA), measured in £ per square feet.

Table 6.1 Large Units (over 100,000 sq ft)[12]

Location	New Accommodation (£/sq ft)	Early 90's Accommodation (£/sq ft)	Land Value per Acre
Derby	£5.75	£3.50	£300,000
Nottingham	£5.75	£4.25	£350,000
Birmingham East	£6.50	£4.50	£600,000
Leicester	£6.25	£4.25	£500,000
Northampton	£6.25	£4.50	£500,000
Coventry	£6.50	£4.50	£550,000
Stoke-on-Trent	£5.00	£3.25	£200,000

The values are provided by Colliers and are for guidance only. A number of factors will influence these including access, type of land available and labour availability. According to CoStar they are also elo Uk average which costs around £6.31 per sq ft, rising by 3.3% on 2016[13]

[12] http://www.colliers.com/en-gb/uk/insights/industrial-rents-map
[13] http://www.costar.co.uk/en/assets/news/2017/January/UK-industrial-rents-soar/

Table 6.2: Small Units (10,000 - 30,000 sq ft)

Location	New Accommodation (£/sq ft)	Early 90's Accommodation (£/sq ft)	Land Value per Acre
Derby	£5.75	£3.50	£300,000
Nottingham	£5.95	£4.25	£350,000
Birmingham East	£6.50	£4.75	£500,000
Leicester	£6.25	£4.25	£475,000
Northampton	£6.25	£4.50	£425,000
Coventry	£6.25	£4.75	£475,000
Stoke-on-Trent	£5.00	£3.00	£175,000

With good rail and road connections, the Bennerley site would be suitable for some rail connected warehousing possibly for one or two users. This should NOT be considered as a Strategic Rail Freight Interchange (SRFI) as the relative size of the site as well as a number of SRFI developments within the vicinity mean it is unlikely to be feasible as such.

However, with a number of large retail developments in the vicinity, such as IKEA as well as urban centres of Derby, Nottingham, Heanor and Ilkeston it may be suitable for one or two rail connected warehouses.

Additionally the sites location 20 miles north of East Midlands Airport, may be of interest to logistics companies looking for a lower cost location, where the potential for late customer cut off ordering times may be attractive.

Potential plans for a secondary siding would further enable the viability of the site allowing two warehouses with dedicated connections. Warehouses could potentially be built on the south side of each rail siding with hard standing to enable vehicle manoeuvring on the western and northern side of the site. The main access road would run around the front of both.

Ancillary offices would be contained within the warehousing complexes rather than separate buildings in order to maximise gross floor area potential. **Figure 6.2** shows an indicative layout for the site.

Symbol	Name	Description
	**Hardstanding**	Developed around the warehousing facility to allow for train loading and unloading.
	**Warehousing Site**	Area used for the storage of goods. It may or may not be directly rail linked depending on final design

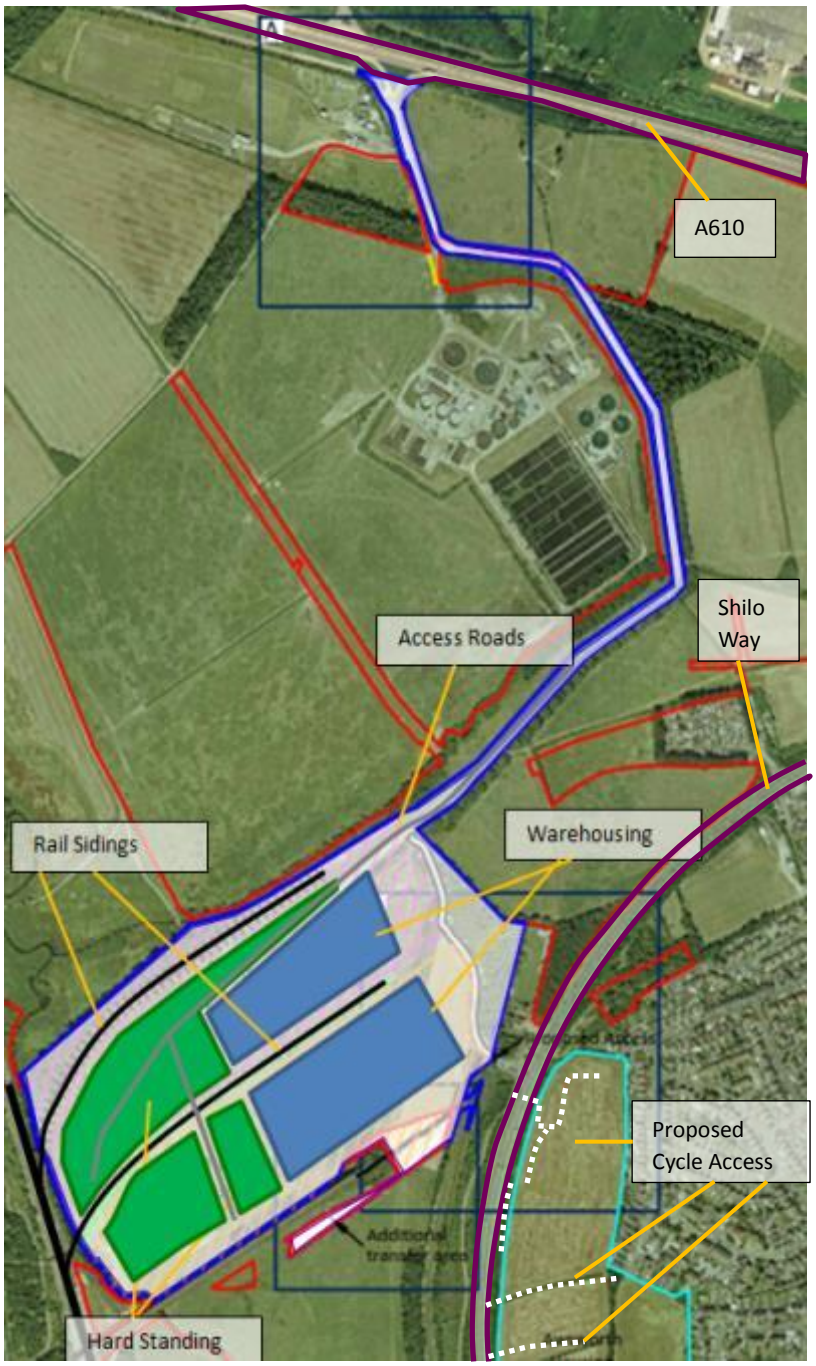


Figure 6.2: Rail Maintenance Facility

Existing infrastructure including the existing site vehicular access, alignments to the rail head and would be renovated and made operational to serve B2/B8 employment uses.

Train access would be would be along the existing alignment with the addition of a new siding providing a second access route. HGV access would be using the existing roadway from the A610 though this may require resurfacing but importantly the junction is still in place. Trains would pull alongside the warehouses and be processed via reach stacker or mobile gantry crane depending on volumes. Some container storage may also be required.

6.4.1 Employment

Depending on the occupier, the site is expected to generate around 100-300 jobs across the site in three shifts.

6.4.2 Operating Hours

The site is likely to be operating 24 hours per day. Depending on the occupier, the night shift may be more intense if it's a retail function in order to replenish stores for next day.

6.4.3 Traffic Generation

A significant proportion of goods into and out of the site would be via rail and therefore the amount of vehicular traffic would be reduced movements would range between 100 and 300 per day. Cars will largely be for the transport of employees as public transport is currently less convenient for the site. However, the site can make good use of the national cycle route that crosses the site in order to encourage cycling to work though this could be mitigated through the use of a works bus. The shift nature of the work will also negate the typical AM/PM commuter peaks seen with many other commercial developments.

Rail traffic is likely to be in the region of 2-4 per day given the number of sidings, though this may increase depending on the type of goods stored on site and warehouse throughput.

7. Alternative Sites

7.1 Introduction

It is important to assess whether other sites across the region and railway network offer better options than Bennerley for the three outlined developments. Therefore a comparison of other potential and/or available sites has been generated, and compared to Bennerley in terms of its rail connection, availability, location and several other factors.

7.2 Site Assessment

In order to review and assess the range of alternative sites for a rail based manufacturing site in the East Midlands it is useful to adopt a set of relevant criteria to aid the analysis.

The provenance of the methodology is a system developed by AECOM, based on elements of the DfT's Transport Analysis Guidance (TAG). The method uses a three phase sifting process to eliminate the unsuitable sites:

- Identify Options
- Initial Sift to identify any immediate show stoppers and unavailable sites
- Development and Scoring Assessment of Potential Options – further detailed analysis used to score alternative sites across a range of criteria

The technique has been used on four previous occasions to help with site assessments;

- Tursdale Freight Terminal for Durham County Council – reviewed 24 sites
- Rail Freight Feasibility Study for South Derbyshire Council – reviewed 8 sites
- Daw Mill Colliery Site, Warwickshire – reviewed 28 sites
- Strategic Distribution Site Assessment Study for the Three Cities Sub-area of the East Midlands for the former East Midlands Development Agency (EMDA) to identify preferred locations for large scale strategic distribution. AECOM undertook a study of 31 different sites and went through a sifting process and recommended a short list of three potential sites as Strategic Rail Freight Interchanges and included an assessment of the site at Bennerley. In this case, the site was excluded due to a lack of land availability to accommodate a SRFI. The methodology to rank the sites was demonstrated and previously approved by the EMDA at a workshop to developers, local authority offices and other stakeholders.

This assessment methodology will now be applied to sites within the vicinity of Bennerley.

7.3 Identify Options

A long list of possible alternatives has been drawn up based on sites within the vicinity of Bennerley with a rail connection according to the EMDA study as well as pages 41 and 42 of the Rail Atlas of Great Britain and Ireland, 14th edition by SK Baker that sets out the railway network within the West Midlands. (**Figure 7.1**). The Baker Atlas is recognised as the leading rail mapping reference publication by industry professionals. The atlas identifies rail freight or rail engineering/maintenance locations within the area.

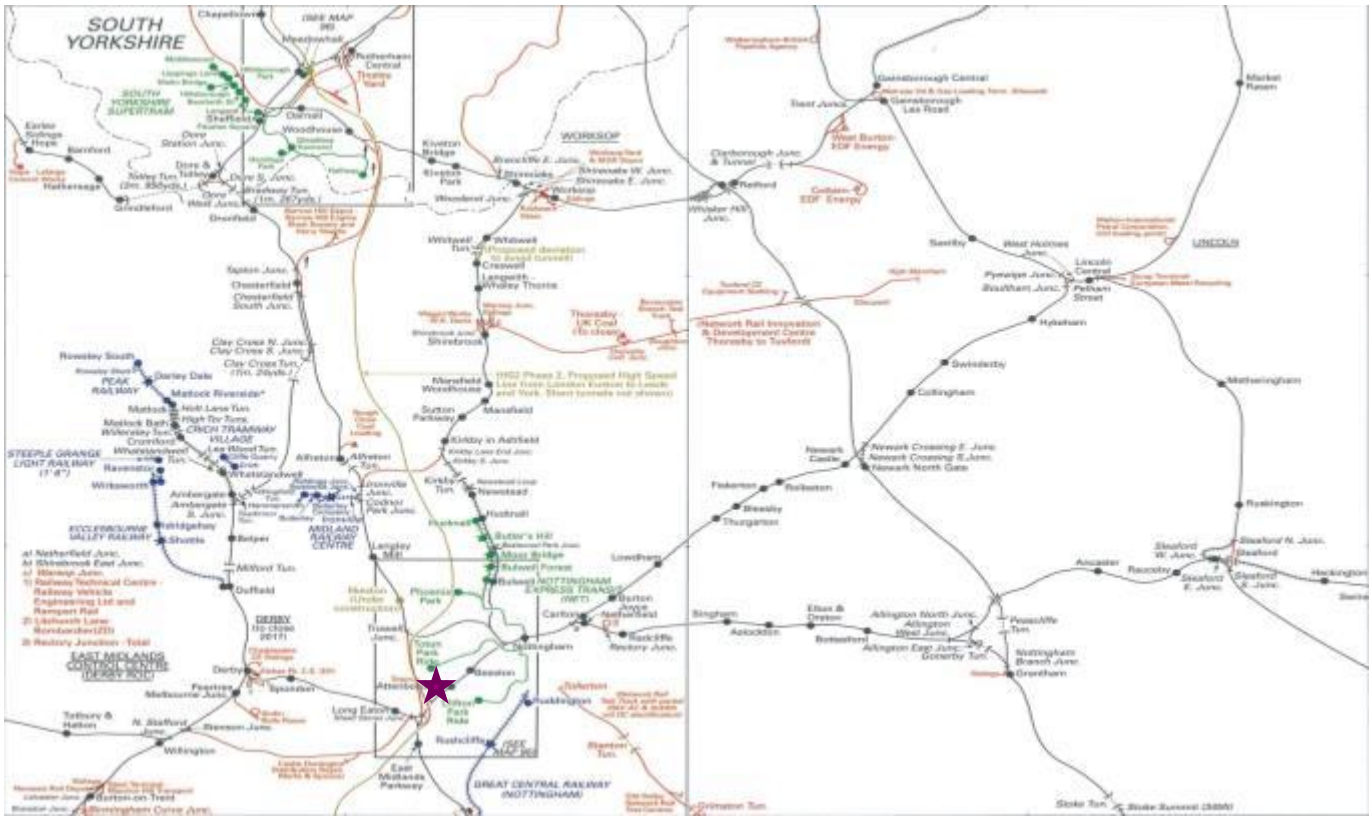


Figure 7.1 – Rail sites in the vicinity of Bennerley (Baker Atlas)

The EMDA Study also identifies a further 20 sites within the study area that may be suitable alternatives, i.e. have adequate road and rail access.

A number of the 38 sites are privately owned and are mainly used by one company for a single commodity such as an oil terminal and hence are unlikely to be available for one of the three uses outlined in **Chapter 6** or designated as having nature reserves and therefore very difficult to develop. Some of the sites are multi-user with potentially some spare capacity but if they serve intermodal or construction based rail services they have been eliminated from the sifting process at this stage for the reasons mentioned below including the fact that market economics will dictate that vacant land on those sites will be needed for their expansion. Finally, any sites less than 40 acres have also been eliminated as they will not be large enough to provide an equivalent facility. Table 7.1 shows the full list of sites.

Name	Sector	Owner/Operator
Bennerley	Energy	Harworth Estates
Worksop Yard	Various	Ind. Estate
Toton	Rail	DB Schenker
Boots site, Nottingham	Retail	Boots/Local Authority
Old Textile Works, Spondon, Derby	Vacant	Celanese Acetate
Melrose Oil and Gas Terminal	Energy	Disused
Grantham Sidings	None	Disused
Rough Close	Energy	Vacant
Old Dalby	Rail	NR
Colwick, Nottingham	Vacant	Local Authority?
Gedling Colliery, Nottingham	Reserved	Harworth Estates
Egginton Common, Derbyshire	Container	Goodman UK Logistics
Markham, near Chesterfield	Energy	Alkane Energy
Cottam	Energy	EDF
West Burton	Energy	EDF
Sinfin	Automotive	Rolls Royce
Nemesis Rail Depot	Rail	Nemesis Rail
Hope Cement Works	Construction	Tarmac
Barrow Hill Depot	Rail	Museum
Wagon Works	Rail	WH Davis
Rockware Glass	Construction	Ardagh Glass
Bevercotes Branch	Rail	Network Rail
Tuxford	Rail	Network Rail
High Marnham	Rail	Network Rail

Name	Sector	Owner/Operator
Walkeringham	Energy	BPA
Welton	Energy	IGAS Energy
Scrap Terminal	Waste	EMR
Chaddeston Sidings	Rail	NR
Etches Park	Rail	EM Trains
Castle Donington	Retail	Clowes Developments
Burton Rail Terminal	Intermodal	Maurice Hill Intl
Beeston Sidings, Nottingham	Reserve	Natural England/County Council
Cotgrave, near Nottingham	Reserve	Local Authority?
Ruddington, Nottinghamshire, Great Central Terminus	Reserve	Local Authority?
Willington power station	Energy	Calon Energy
Drakelow power station	Energy	E.ON
Tetron Point industrial estate (Nadins), Swadlincote	Ind Estate	Knight Frank
Central Rivers	Rail	Virgin

Those sites that are discounted at this first stage are marked in red. Those eliminated include private sidings and those in intermodal or construction sectors. This leaves five sites, primarily comprised of disused power stations, coal mining infrastructure, rail engineering facilities or vacant land.

7.4 Development and Assessment of Potential Options

There are a number of sites that may offer possible excess land or track capacity for operations similar to those proposed at Bennerley. Each site is discussed in terms of size, access and location. The site is indicated in red, rail access in black and road access in blue.

7.5 Worksop

The Worksop site is / immediately to the west of the passenger station on vacant land adjacent to the mainline. The key issue is that the sidings adjacent are on the other side of the mainline, therefore likely to require a new connection or elaborate management to move goods across the mainline from the sidings. It is large enough for the site requirements; however difficulties in crossing the mainline mean that it is unlikely to be viable.

7.6 Toton

The Toton facility and train maintenance depot is a large facility situated on the Nottingham-Sheffield line and is currently operated by DB Cargo. It is therefore unlikely that there is sufficient capacity to share these facilities. Additionally, the site has been selected by HS2 in order to become the new station hub for East Midlands. It is likely therefore that long term opportunities are limited. In addition, when HS2 begins operation, existing services at Toton will have to be moved elsewhere, presenting a need for additional sites in the area. So this site is not an option.

7.7 Boots Site

One hundred hectare site located in south west Nottingham, opposite Beeston Sidings. It is currently an industrial estate. Nottingham City Council and Broxtowe Borough Council have both proposed using this site for housing and employment, and neither supports the development of a rail freight interchange.

The Boots site is larger and has a more convenient shape than Beeston Sidings, making it preferable. Rail frontage length is good and there would be capability to accommodate 775m trains. Rail access to all routes through Nottingham and various cross country routes is possible. It should be noted that Network Rail do have some concerns regarding capacity issues between Trent Junction and Lenton Junction, the route upon which this site is located.

Access to the M1 would take approximately 15 minutes via congested urban A roads. There are significant capacity issues present at junctions on these routes, which are expected to worsen in future. Highways England has raised concerns regarding how vehicles would access the site from the Strategic Road Network; their current A52 Corridor Study may shed light on this issue.

Whilst the Boots site is nearer to the centre of the Nottingham conurbation than any other site and hence possesses a great potential to serve that city, this means that any road connectivity will be through the A52 which is currently at full capacity. The downside of the sites location is that it is significantly less attractive to serve the rest of the study area. The site is close to Beeston and Nottingham City station and there are regarded to be capacity problems in this area.

7.8 Spondon

This is a 45 hectare site in East Derby, on the W7-gauge rail route between Loughborough and Derby.

The nearest Strategic Freight Network point of contact is Trent Junction, approximately 7 miles distant. For northbound routes, trains would travel from Trent Junction via the Erewash Valley line. Access to the W8-gauge Castle Donington Branch and beyond would require reversal at Toton. The site has a west-facing connection. There is insufficient internal length to accommodate 775m trains without them being split in two; access to the M1 can be achieved in around 10 minutes via the A52.

7.9 Conclusion

Having examined all 38 possible sites, only Bennerley and four possible alternatives are able to provide the mix of road and rail access / capacity as well as suitable size that is required for the site proposed, with Spondon providing good rail access and enough area, but having poor road access. A number of these would require significant remedial work to the extent that a business case for a site as described in **Chapter 6** will be heavily compromised. Additionally, several sites have been identified for larger, mixed use projects or industrial/commercial developments.

Bennerley offers convenient links to the A610 and the A6096 as well as potential mainline rail connections to destinations across the East Midlands and wider UK, all with ample capacity for the expected traffic generation. Its proximity to urban areas, offers an opportunity for local labour availability and integrated transport with cycle ways and pedestrian access to neighbouring conurbations.

8. Conclusions

The location which was a legacy coal loading site means the alignment of the former track layout was found to be level and suitable for modern railway freight operations without further grading works, which is particularly important for the feasibility of Bennerley.

Chapter 3 illustrated the strong growth in rail passenger numbers, and highlighted a number of market segments as growth sectors, these include the: construction, intermodal (Ports), intermodal (Domestic), Channel Tunnel and automotive sectors. Additionally, there is potential for growth at a smaller scale in industries such as: parcels, premium rail freight, urban logistics, and international high-speed rail freight. In order to meet this growth in rail demand over the next decade, there is an immediate need for new rolling stock, new attendant maintenance facilities and a replacement of the increasingly aging fleet.

Analysis of site attributes confirmed that;

- The site is at a good geographic rail location in Central UK with southbound connection to the “Classic” rail network and HS2 at Toton
- There is good road access to the A610 / M1
- There would be train paths available to/from the site on the rail network
- The site and shape is suitable in terms of operational practicality
- The site is relatively available; and alignment for track relaying is suitable
- Reinstatement to the mainline would be required
- There is a very skilled labour pool nearby which is centred on the UK rail sector in Derby which is within suitable commuting time (less than 30 minutes)

There is potential demand connected to the rail sector that this site can fulfil and there is urgent need for sites to be brought forward for this. There is a sufficient steady state capacity to accommodate additional rail freight services to / from the proposed site; however, during the HS2 construction there is a potential for temporary capacity issues. As indicated in Chapter 6, railway construction uses, train manufacturing, maintenance and rail connected warehousing are potential end uses that could be taken forward. The construction sector, rolling stock maintenance and replacement as well as HS2 were cited as principal market demand drivers.

Current policy at a National / Regional and Local level supports the utilisation of the Bennerley site for the purposes identified – demonstrated in Chapter 5. Furthermore, there is a clear and immediate demand to develop Britain’s rail infrastructure and rolling stock. European and UK National policy identifies the importance of rail in order to meet the country’s carbon targets. Hence, the government is engaged in a period of heavy investment, the largest in 50 years, to improve the existing network as well as create new infrastructure and invest in rolling stock. To realise these investments, supporting infrastructure is needed in the immediate term. A key priority of the East Midlands HS2 Growth Strategy (Sep 2016) indicated that re-modelling Trent Junction is required to meet the long term passenger and freight requirements. This is particularly important given that Bennerley has a south facing connection.

The three uses considered in Chapter 6 for Bennerley are railway manufacturing and construction site, train maintenance facility and rail connected warehousing’.

The **railway manufacturing and construction** site would take advantage of Bennerley’s strategic location and would enable the manufacture and distribution of rail components for both the classic network and HS2 developments. This would benefit building material suppliers and major railway project contractors, as well as Network Rail. The bulk of

material and finished products would enter and egress by rail allowing the site to run for 24 hours a day but with few train movements overnight

A **train maintenance or assembly facility** capable of serving either the freight or passenger markets could be of interest to at least five passenger operators, five freight companies, several rolling stock leasing companies and four train manufacturers; all of which have operations in the East Midlands. The facility could enable the repair, refurbishment and testing of trains, and provides a suitable use should road traffic impacts need to be minimised. The majority of work would take place overnight enabling trains to be operational during the daytime.

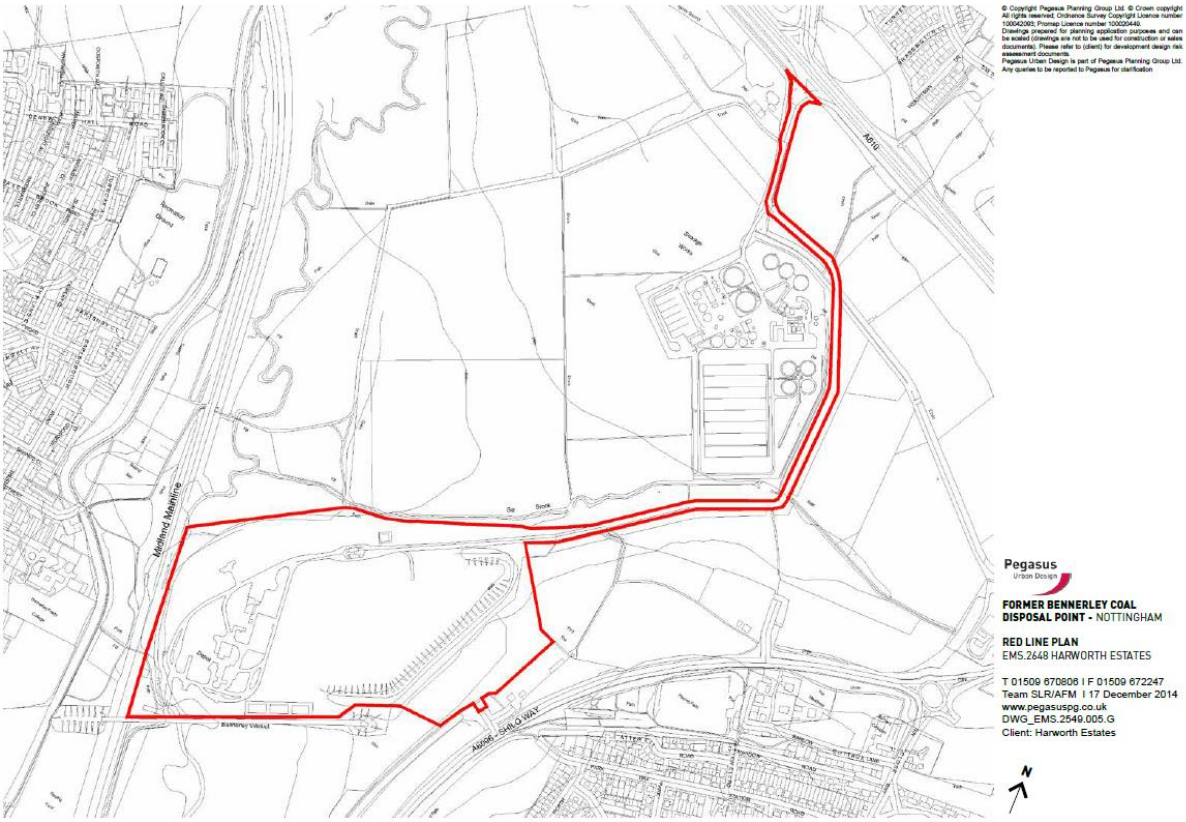
The third potential area that was identified is **rail connected warehousing**. The site's potential south facing rail connection on to the MML, existing road access to the A610, and spatial location for workers lends itself well to rail connected warehousing. This could service local sub regional industrial demand centres such as Derby, Nottingham and IKEA in nearby Giltbrook.

Chapter 7 identifies five sites suitable out of a possible 38 alternatives examined. The assessment indicated that Bennerley is a suitable size and provides the optimum combination of road and rail access. Many of the sites examined are former collieries in Harworth's own estate but would require significant remedial work which could compromise a business case for the; additionally a number of these have been identified for larger, mixed use projects or developments.

Therefore, Bennerley has the greatest potential to provide a strategic opportunity for a developer seeking an available rail connected site for a wide range of rail industry uses. We recommend early engagement with Network Rail to establish if the recent or proposed network enhancements in the area, especially in the field of signalling, are likely to have any adverse effect on increasing the cost of re-establishing a connection to / from the site.

In summary, the Bennerley site is a suitable rail freight terminal location, appropriate for one of the three potential uses identified in Chapter 6. Significant strengths include the site's: road access to the A610 / M1 and proximity to the Midland Main Line, Toton and HS2 Routing. The site is within a 30 minute drive to a significant skilled labour and customer pool yet does not neighbour any residential areas.

Appendix 3: Area Proposed for Allocation



POLICY 9
67-69

Broxtowe Part 2 Local Plan

Broxtowe Borough COUNCIL

Agent

Please provide your client's name	

Your Details

Title	Mr ~~Mrs~~ ~~Miss~~ ~~Ms~~ ~~Other:~~
Name	DAVID PEARSON.
Organisation (If responding on behalf of the organisation)	
Address	[redacted]
Postcode	[redacted]
Tel. Number	[redacted]
E-mail address	[redacted]

Broxtowe Borough Council
Planning & Community Development
- 3 NOV 2017

Comments should be received by 5.00pm on Friday 3rd November 2017

If you wish to comment on several policies, paragraphs, or sites, please use a separate form for each representation.

If you would like to be contacted by the Planning Policy Team regarding future consultations.

Please tick here ☑

Please help us save money and the environment by providing an e-mail address that correspondence can be sent to [redacted]

For more information including an **online response** form please visit:

www.broxtowe.gov.uk/part2localplan

Data Protection - The comment(s) you submit on the Local Development Framework (LDF) will be used in the plan process and may be in use for the lifetime of the LDF in accordance with the Data Protection Act 1998. The information will be analysed and the Council will consider issues raised. Please note that comments cannot be treated as confidential and will be made available for public inspection. All representations can be viewed at the Council Offices.

Please return completed forms to:

Planning Policy, Legal and Planning Services, Foster Avenue, Beeston, Nottingham NG9 1AB
For more information: Tel: 0115 917 3452, 3448, 3468 or 3015 E-mail: policy@broxtowe.gov.uk

Question 1: What does your comment relate to? Please specify exactly

Document	Policy number	Page number	Policy text/ Paragraph number
Part 2 Local Plan	**Policy 1:** Flood Risk		
	Policy 2: Site Allocations		
	Policy 3: Main Built up Area Site Allocations		
	Policy 4: Awsworth Site Allocation		
	Policy 5: Brinsley Site Allocation		
	Policy 6: Eastwood Site Allocation		
	Policy 7: Kimberley Site Allocations		
	Policy 8: Development in the Green Belt		
	Policy 9: Retention of good quality existing employment sites	77	
	Policy 10: Town Centre and District Centre Uses		
	Policy 11: The Square, Beeston		
	Policy 12: Edge-of-Centre A1 Retail in Eastwood		
	Policy 13: Proposals for main town centre uses in edge-of-centre and out-of-centre locations		
	Policy 14: Centre of Neighbourhood Importance (Chilwell Road / High Road)		
	Policy 15: Housing size, mix and choice		
	Policy 16: Gypsies and Travellers		
	Policy 17: Place-making, design and amenity		
	Policy 18: Shopfronts, signage and security measures		
	Policy 19: Pollution, Hazardous Substances and Ground Conditions		
	Policy 20: Air Quality		
	Policy 21: Unstable land		
	Policy 22: Minerals		
	Policy 23: Proposals affecting designated and non-designated heritage assets		
	Policy 24: The health impacts of development		
	Policy 25: Culture, Tourism and Sport		
	Policy 26: Travel Plans		
	Policy 27: Local Green Space		
	Policy 28: Green Infrastructure Assets		
	Policy 29: Cemetery Extensions		
	Policy 30: Landscape		
	Policy 31: Biodiversity Assets		
	Policy 32: Developer Contributions		
Policies Map			
Sustainability Appraisal			
Other (e.g. omission, evidence document etc.)			

Please use a separate sheet of paper if required. Please use one form per representation.

Question 2: What is the issue with the Local Plan?

Do you consider this paragraph or policy of the Local Plan to be: *(please refer to the guidance note at for an explanation of these terms)*		Yes	No
2.1	Legally compliant		
2.2	Compliant with the duty to co-operate		✓
2.3	Sound		✓

Question 3: Why is the Local Plan unsound? Please only answer this question if you answered 'No' to 2.3 above

If you think this paragraph or policy of the Plan is not sound, is this because:	
It is not justified	
It is not effective	✓
It is not positively prepared	✓
It is not consistent with national policy	

Your comments

Please give details of why you consider this part of the Local Plan is not legally compliant, is unsound or does not comply with the duty to co-operate. Alternatively, if you wish to support any of these aspects please provide details. Please be as precise as possible. Continue on an extra sheet if necessary.

Policy 9 : Page 62-9:
Retention of good quality existing employment sites.
This policy is not sound or effective as it does not clearly set down what its definition is of a "good quality existing employment site" without a clear idea of what this means, then any judgement is subjective and a matter of opinion to whoever makes the decision. This whole policy needs to be set out more clear.

Question 4: Modifications sought

Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. Continue on an extra sheet if necessary.

Without any "clear" definitions of the term good quality it is impossible to set clear modifications.
Aligned Core Strategy Policy 4 needs to be reviewed and much clearer definitions laid down as to its meaning.
Once this has been done, then it may be possible to suggest clear modifications
No evidence of improvement until Core Strategy was put into force.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. **After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

Question 5: Public Examination Attendance

If your representation is seeking a modification, do you consider it necessary to participate at the public examination?	
Yes, I wish to participate at the public examination	✓
No, I do not wish to participate at the public examination	

If you wish to participate at the public examination, please outline why you consider this to be necessary

In order that residents and the inspector have a clear idea of what this policy / actually means, I would like to be at the public examination in order to try to ensure that the public have a clear idea of what it means.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the public examination.