



BROXTOWE LOCAL PLAN PART 2

PUBLIC EXAMINATION

**HEARING STATEMENT IN RESPONSE TO THE INSPECTOR'S
MATTERS AND QUESTIONS PAPER**

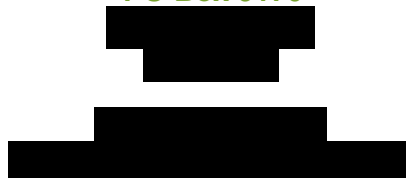
**RESPONDENT 178
CAUNTON ENGINEERING LTD
RESPONSE TO MATTER 2**

**WHETHER THE APPROACH TO EMPLOYMENT PROVISION IS
JUSTIFIED, EFFECTIVE AND CONSISTENT WITH THE NATIONAL
PLANNING POLICY FRAMEWORK (NPPF) AND THE ALIGNED
CORE STRATEGY (ACS)**

PREPARED BY

**Mark Flatman
Managing Director**

**iPlan Solutions Ltd
PO Box 9170**



These responses on behalf of Caunton Engineering Ltd (**Caunton**) made to the specific questions raised by the Examination Inspector should also be read in conjunction with the responses and associated appendices submitted by iPlan Solutions to the Publication Core Strategy dated 3 November 2017. To assist, this Letter is appended at **Appendix A**. It provides document reference numbering which has been used below where the relevant documents are discussed further within this Hearing Statement.

The appendices appended to this Hearing Statement are scheduled as follows;

Appendix A	Letter to Broxtowe BC, 3 November 2017
Appendix B	Extent of Caunton Occupation at Moorgreen Industrial Park
Appendix C	BBC SHLAA Employment Site Review 2016
Appendix D	Moorgreen Industrial Park Update Note, 2018

1) Is it sufficiently clear from the Plan how the ACS requirement of 34,000 m² of office and research floorspace and 15 ha of land for industrial and warehouse use is to be met? Which sites contribute to meeting this need?

1.1 The ACS facilitates the ability for the Pt2 LP to exceed Policy requirement 4b) of 34,000 m² of office and R&D floorspace and d) requirement of 15 ha of land for industry and warehousing as both criteria are prefaced by the word;

“minimum”

1.2 Policy 2 deals with site allocations in the Pt2 LP, however paragraph 2.1 highlights the focus and perspective of the Pt2 LP being only towards dwellings as it expressly states;

“Only sites that can accommodate 10 or more dwellings are included.”

- 1.3 Policy 3 -7 only specifies sites for residential allocations.
- 1.4 There are insufficient employment site allocations during the plan period, demonstrating that the plan has not been positively prepared and rendering it ineffective, inflexible and unsound.
- 1.5 Map 3 in the Pt2 LP identifies the existing Boots campus mixed use commitments within Broxtowe at Beeston but without any explanatory text to explain the context and delivery timescale.
- 1.6 Policy 3.1 includes provision of an unspecified level of subjectively **“small-scale employment development”** as the 11th bullet point of the key development requirements accompanying the 500 dwelling allocation at Chetwynd Barracks, but with no associated delivery timescale.
- 1.7 Policy 3.2 anticipates 18,000m² of employment space at Toton. As this is beyond the plan period it does not contribute towards the requirements of ACS Policy 2.
- 1.8 Beyond that identified above, iPlan Solutions has not been able to identify any specific meaningful employment land allocations or facilitating policies encouraging or allocating the provision of additional new employment development within the Pt 2 LP. Consequently it is unsound and starkly at odds with paragraph 3.4.1 of the ACS stating;

“New employment development is vital to the growth of the plan areas economy.”

2 Will the sites allocated adequately provide for the different types and size of employment premises needed to support both established and start-up businesses in the borough?

2.1 The ACS clearly envisages the constituent LPAs to provide a range of employment sites within their constituent Pt2 LPs, as indicated in paragraph 3.4.6 which states;

“To help promote and strengthen the role played by local economies serving communities around the conurbation, a range of suitable sites for new office-based development, and to a lesser extent industry and warehousing, will need to be a provided across the area..... It is likely that some existing businesses may need to relocate for reasons which include the long-term suitability of their premises, desire to expand or in order to diversify the nature of their operations, or to allow for regeneration and redevelopment. To meet these needs, new sites are required which can help meet regeneration needs...”

2.2 Consequently paragraph 3.4.6 of the ACS, whilst focusing upon the provision of new office-based development, also acknowledges that industry and warehousing provision will need to be provided across the area. Paragraph 3.2 of the Pt2 LP states BBC considers exceptional circumstances require GB boundary amendments to allow residential development. No consideration has been given in the plan preparation process however to comparable employment land requirements, despite this need being previously highlighted to BBC in **Docs 4, 5 and 8** and as discussed in the iPlan Solutions response to Matter 11 of this Examination.

2.3 In failing to provide certainty to Caunton through the release of the requested parcel of land from the GB to facilitate the growth of the business, **Doc 1 & Doc 3**, the plan is not positively prepared and ineffective thereby preventing it being consistent with national policy to facilitate the economic role of the planning system as required by paragraph 7 of the NPPF, and the first bullet point of

paragraph 21 to plan in a manner that supports the expansion of existing businesses such as Caunton.

3 ACS Policy 4c) refers to the promotion of further office development in Beeston. It is required to meet the employment floor space requirements and if so how is it to be achieved?

3.1 Caunton has no comment that it wishes to make in response to this question.

4 Does the plan make appropriate provision for the retention, expansion and development of a range of different types of employment site and uses in the borough in accordance with national policy?

4.1 Policy 4 of the ACS expects the economy of the LP area to be strengthened through the provision of floorspace **“across all employment sectors.”**

Criterion a) of Policy 4 requires LPA's to

“provide a range of suitable sites for new employment that are attracted to the market especially in terms of accessibility, environmental quality and size, particularly where it will assist regeneration.”

4.2 Policy 9 of the Pt2 LP proposes retention of good quality existing employment sites. Those specified at Policy 9 at paragraph 9.1 are not identified on the Proposals Map and so the plan is not effective and has not been sufficiently positively prepared to enable the reader to readily identify the location of these individual sites.

4.3 Moorgreen Industrial Park is referenced as one of the 33 identified the quality employment sites policy 9. Criterion 3 theoretically would facilitate the release of land from the Green Belt. However where a positive business case has been advanced for the release of land from the GB in order to facilitate the continued

prosperity of an existing well-established business this issue should be addressed within the Pt 2 LP.

- 4.4 Caunton are the major occupier at Moorgreen Industrial Park, **Appendix B**. Following a dialogue with the Lambs Close neighbour to the east, the area within the objection site originally proposed for trailer storage and trial frame fabrication as shown on the layout in **Doc 2** was refined and increased the landscape buffer to that property and is demonstrated in the Landscape Strategy drawing 014.1135.001D of November 2017, **Doc 3**.
- 4.5 Caunton have a reasonable expectation that having presented the case to successive LP and GB Review preparation stages conducted by BBC that such employment land provision will be made through the express removal of the requested land from the GB as a specific allocation in the Pt2 LP in order to facilitate the known accommodation requirements of the business. Consequently, the plan currently does not make appropriate provision for the expansion of the Caunton employment site, particularly in accordance with the first sentence of the third bullet point of paragraph 21 of the NPPF 2012.
- 4.6 The justification for Policy 9 is explained in paragraph 9.1 of the Pt2 LP. Here it is explained that the assessment of employment requirements was undertaken - and the findings set out - in the SHLAA 2015/2016. This is contained in appendix 1 of that document comprising of a schedule of sites in the matrix disaggregated to indicate whether the site was to be considered as part of the SHLAA exercise, **Appendix C**. It is clear the exercise was solely undertaken from the perspective of determining whether there was scope to release the employment site *for residential development*. There has been no true assessment of employment land requirements per se.
- 4.7 iPlan Solutions notes the Foreword of the Economic Regeneration Strategy 2015-2019, **EM/02**, stresses that;

“Economic Development is a key priority for Broxtowe Borough Council and we all recognise the benefits a strong local economy is to the vitality and well-being of the locality.”

- 4.8 Within the Vision under the sub-heading of ‘Jobs and Business Growth’, the Council state that it wishes to see more jobs, work experience and apprenticeships available for people in Broxtowe with growing businesses. In the last 4 years Caunton has increased the workforce from 200 to 250 employees. In addition it also employs 5 apprentices from the local community each year in order to reinforce and engender a local workforce.
- 4.9 iPlan Solutions considers it to be a significant shortcoming of the plan preparation process that the only putative substantive assessment in relation to employment land requirements needed by existing employers active within the local economy has been superficially derived from an assessment presented within a Strategic Housing Land Availability Assessment undertaken with the sole objective of establishing whether employment sites were suitable *for release for residential development*. This is reflective of the residential-centric focus of the plan preparation and GB review process, the shortcomings of which were previously flagged to BBC, **Docs 4, 5 & 8**. In this regard, as a consequence, the plan has not been positively prepared, is ineffective and unsound.
- 4.10 A strategic development plan is being pursued by Caunton at Moorgreen Industrial Park to improve the business workflow efficiency and capacity. This was presented to local Councillors and Officers of BBC in December 2015, **Doc 2**.
- 4.11 The release of the requested land from the GB for use for trailer storage forms part of this strategy, and will in turn enable 6500 m² of new employment floor space to be constructed at the Forest Park site within the Moorgreen Industrial

Park that has previously had planning permission for the erection of industrial units and further thereby increasing the supply of employment opportunities in this northern part of the Borough. **Appendix D** contains an updated position statement provided by Caunton.

- 4.12 In order to provide business certainty to Caunton, it is requested that the Plan Inspector recommends a modification to the Pt2 LP removing the land shown on **Doc 1** from the GB and its allocation for employment storage purposes specifically for trailer storage and trial construction of prefabricated steel in accordance with **Doc 3**.

FAO Steffan Saunders
Head of Neighbourhoods and Prosperity
Directorate of Legal and Planning Services
Broxtowe Borough Council
Council Offices, Foster Street
Beeston, Nottingham
NG9 1AB

03 November 2017

Our Ref 014/001/MJF
Your Ref

Dear Steffan

**Broxtowe BC Publication Part 2 Local Plan
Objections to Policies 2, 6 and 8
on Behalf of Cauntton Engineering Ltd
in respect of land North West of the Plane Building at Lamb Close Drive, Eastwood**

Further to the publication of the Part 2 Broxtowe Local Plan, I enclose objections on behalf of Cauntton Engineering Ltd in respect of the land owned by the company situated North West of the Plane Building at Lamb Close Drive, Eastwood.

The documentation that is submitted is as follows;

- Policy 2-Site Allocations Objection Form
 - Policy 6- Eastwood Site Allocations Objection Form
 - Policy 8- Development in the Green Belt Objection Form
1. Broxtowe BC Sept 2017 Publication Pt2 Local Plan Proposals Map Extract Showing Objection Site
 2. Moorgreen Eastwood Strategic Strategic Growth Masterplan Briefing Note, December 2015
 3. Cauntton Site Expansion Landscape Strategy 14-1135-001D
 4. Response Submitted to Broxtowe BC Site Allocations Issues & Options Consultation 10 January 2014
 5. Letter to S Saunders – Greenbelt Assessment Framework, 19 September 2014
 6. Flood Risk Scoping Study – Cauntton Expansion, Prepared by BWB Consulting, 12 Sept 2014
 7. Transport Statement, Prepared by BWB Consulting, 17 February 2015
 8. Letter to S Saunders – Greenbelt Boundary review Consultation, 23 March 2015
 9. AECOM LVIA 2017 Site LS38 W Engine Lane, Eastwood
 10. Cauntton Trailer Storage Expansion Landscape & Visual Assessment and Photographic Appendix A Figures and Photoplates Prepared By Ian Stemp Associates

Planning & Development Consultants

Planning Advice, Appraisals, Applications & Appeals | Planning Statements & Impact Assessments
Design & Access Statements | Strategic Site Promotion | Project Management | S.106 Agreements

I confirm that I wish to participate at public examination.

Please confirm receipt of the objections and advise of the progress of the local plan, including when the representations are to be considered by the Council Planning Committee and also the arrangements for the public examination.

Should you wish to discuss any aspect of these objections, please do not hesitate to contact me.

Yours sincerely

This letter is sent electronically and therefore unsigned.
If you would like a signed copy, please contact iPlan Solutions Ltd
and one will be forwarded to you.

Mark Flatman
Managing Director

Enc. Objection Documents as Specified within Letter on CD

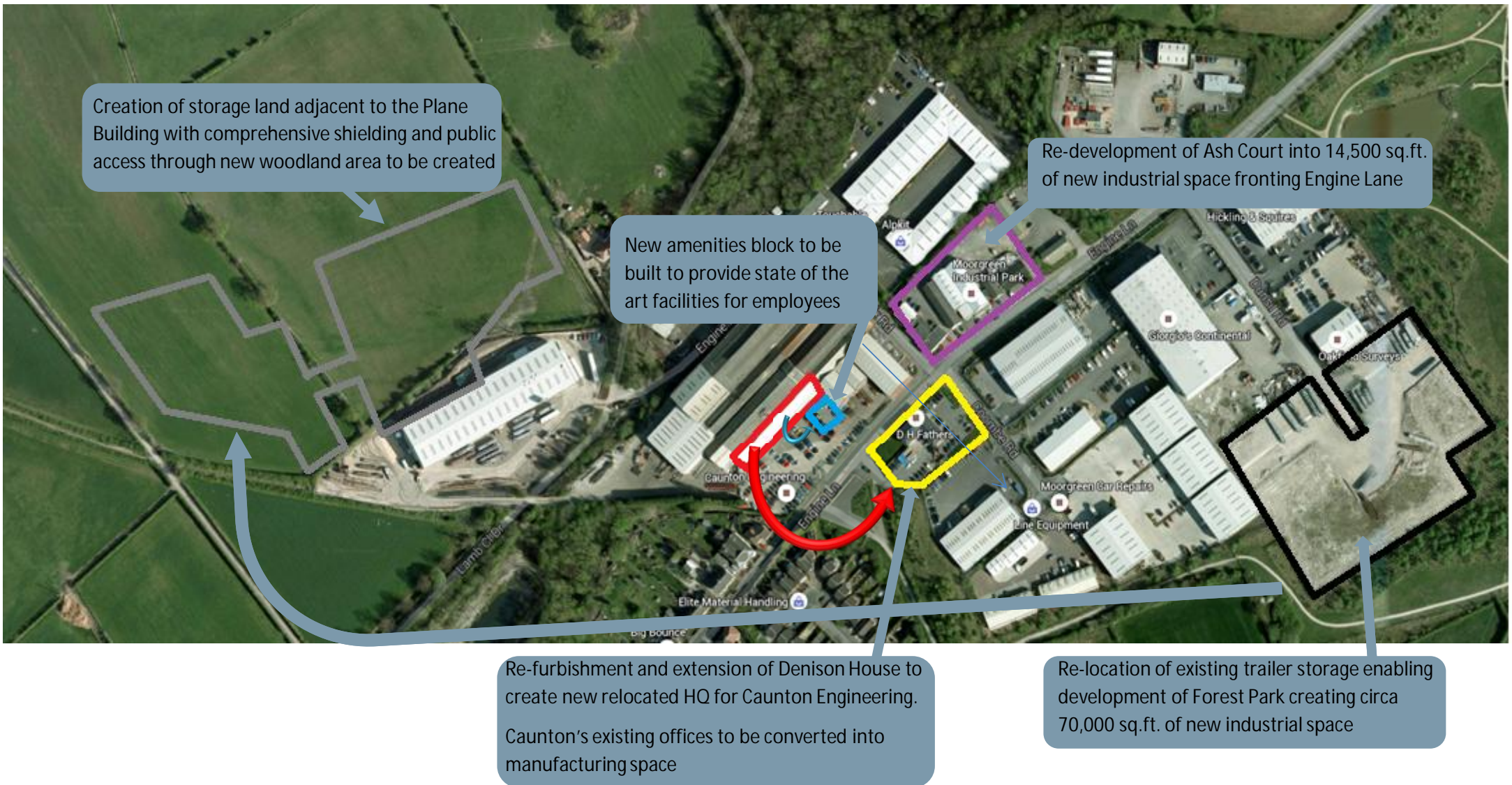
CC. Simon Bingham – Chairman, Caunton Engineering Ltd

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Google Maps Engine Ln



Imagery ©2018 Google, Map data ©2018 Google 50 m



Appendix 1:

Summary of the employment site review 2016

Site Name	Existing Employment Allocation	Retain	Release in part	Release in whole
Chilwell Meadows Business Park Brailsford Way Attenborough	✓	✓		
Eldon Road Business Park Attenborough	✓	✓		
Beeston Business Park Technology Drive Beeston	✓		✓	
Padge Road Boulevard Industrial Park Beeston	✓	✓		
Lilac Grove Beeston		✓		
Boots Campus Lilac Grove Beeston			✓	
Evelyn Street Beeston	✓		✓	
Regent House Lower Regent Street Beeston				✓
The Poplars Beeston	✓	✓		
Simplex Knitting Co 164 Bye Pass Road Chilwell	✓	✓		
Chetwynd Business Park Regan Way Chilwell	✓	✓		
Main Road (Including Fernwood Drive Common Road and British Bakeries Ltd) Watnall	✓	✓		
Barrydale Avenue Beeston	✓			✓
Palmer Drive (Includes Bessell Lane) Stapleford	✓	✓		
Former Dyeworks Site West End Street Stapleford	✓	✓		
Sandiacre Road/Wellington Street Stapleford				✓
Pasture Road (Including Silicone Altimex) Stapleford	✓	✓		
New Road Stapleford	✓	✓		
Hickings Lane Stapleford	✓	✓		
New Road Industrial Estate Stapleford Road Trowell		✓		
Strelley Hall Strelley		✓		
Custom Upholstery Sidings Lane Bramcote				✓
Balloon Wood Industrial Estate Coventry Lane Bramcote		✓		
Eagle Mill Ilkeston Road Trowell		✓		
Cossall Industrial Estate Soloman Road Cossall	✓	✓		
Robinettes Lane Cossall	✓	✓		
Gin Close Way Awsworth	✓	✓		
Home Farm Nottingham Road Nuthall				✓
Phoenix Park Nuthall	✓	✓		
Giltbrook Industrial Park Giltway Giltbrook	✓	✓		
Amber Trading Estate Giltbrook	✓	✓		
Essentra Giltbrook Industrial Park Giltway Giltbrook	✓	✓		
Birch Park Halls Lane Giltbrook	✓	✓		
Newmanleys Road Eastwood	✓			✓
Microlise Engineering Ltd Farrington Way Eastwood	✓	✓		
Meadowbank Court Meadowbank Way Eastwood	✓	✓		
Nottingham 26 Eastwood	✓	✓		
Moorgreen Colliery Site Engine Lane Moorgreen Industrial Park Newthorpe	✓	✓		
Great Northern Road Eastwood				✓
Factory Lane (Including Wilmot Lane & Holly Lane) Chilwell			✓	

CAUNTON ENGINEERING CURRENT DEVELOPMENTS AND RECENT COMPLETIONS

Ash Court Regeneration

The previous 1207^{m²} (13,000^{sqft}) of industrial space was of very poor quality. This has been replaced by 1347^{m²} (14,500^{sqft}) of new fit-for-purpose industrial space that fronts Engine Lane and provides accommodation for local businesses. These units have proved very successful and are now all fully occupied. New businesses have been brought onto the Industrial Park offering further employment opportunities for the local economy for the longer term.

Denison House

Caunton are currently on site converting and extending the property to create a state of the art new HQ building that can accommodate the successful growth of the business. The new facility will be more than double the square footage of the existing offices.

Main Production Building

The space currently occupied by the existing office accommodation will be absorbed back into the main manufacturing function of the business in order to increase Caunton's manufacturing capacity to help meet their customers' growing needs. The staff will move over into the new HQ building mid-2019.

Within the existing main production facility, an extensive refurbishment has taken place creating a new production management suite, and a suite of new welfare facilities.

Forest Park

Caunton currently use Forest park for trailer storage of finished product prior to it leaving for site as well as the occasional test build. The extent to which trailer storage is required fluctuates throughout the year due to a myriad of reasons from weather hampering deliveries to significant tonnages being required to be pre-fabricated ahead of commencement on site. The Government's Industrial Strategy points towards a greater use of off-site manufacture in the coming years and having the ability to make then store ahead of any on site start will prove to be a significant competitive advantage. Unless this storage is moved elsewhere the Forest Park industrial units will remain undeveloped.

The test build site on Forest Park has been extensively used over recent years as Caunton secured a £1.2m Research and Development project funded by Innovate UK. The project looked at developing a patented system of second generation Steel Concrete (SC) construction. The project proved a huge success drawing attention from interested parties around the world. It has now come to a close and the test build will be demounted in the near future. Suffice to say while that project was running Forest Park remained a key part of the Caunton jigsaw.

<https://youtu.be/MbbkE0Ex9i0>

Trailer Park

There have been a number of factors explaining why Caunton has not already submitted a planning application. At one level the Local Plan was awaited to see what, if any, considerations were given to economic development and the anticipation that the requested allocation of the site to remove uncertainty. Caunton has actively engaged with its nearest neighbour and the scheme has changed and evolved over the intervening period as a consequence. Additionally, the land in question is currently rented to a local farmer whose annual crops required harvesting prior to ground investigations and associated surveys being undertaken. This work is now underway. A traffic analysis was also undertaken.

The need to push forward with the trailer park was subject to the hiatus caused by the Innovate UK R&D project introducing an unusual short-term period when there was not the need to press ahead for further storage capacity to the extent expected going forward. Most importantly Caunton has been ensuring that the business continues to meet its customers' requirements. With close to or just over 250 direct employees and an annual intake of 5 local apprentices from the surrounding schools Caunton continues to strive forward despite the growing confusion of the political landscape and the largest single corporate failure in UK's history impacting upon the industry in which Caunton operates - namely Carillion. Although Caunton is not directly engaged with former Carillion projects, the ripple effect through the market of such a large construction player falling over became highly significant in dealing with other construction related business aspects such as bank facilities, bond facilities and insurances. All these things have taken up significantly more time than hitherto and the day to day imperative of running the business has meant the trailer park development proposals, whilst vitally important as part of the longer term business strategy, have had to take a temporary back seat as more immediate issues are dealt with.

Simon Bingham
Chairman

14 November 2018