

FAO Tom Genway  
Planning Policy Officer  
Broxtowe Borough Council  
Council Offices, Foster Street  
Beeston, Nottingham  
NG9 1AB

29 January 2019

Our Ref 018/026/MJF  
Your Ref

Dear Tom

**Broxtowe BC Part 2 Local Plan Examination  
Post Examination Actions M2A1, M2A2, M2A3, and M2A6  
on Behalf of Caunton Engineering Ltd – Objector Ref 178 and  
Foulds Investments and Whitehead Concrete Ltd – Objector Ref 1201**

Further to your email of 24 January, thank you for the opportunity to consider the above Further Action Documents that were attached to the email. I comment below as follows on behalf of Caunton Engineering Ltd, Objector 178 and Foulds Investments and Whitehead Concrete Ltd, Objector Ref 1201

**Action M2A2: Matter 2- Employment**

1. Caunton Engineering and Foulds Investments have no comment to make on this Action.

**Action M2A3: Matter 2- Employment**

2. Simply because an issue was not discussed at the Examination in respect of either the Gedling or Nottingham City LP Examination does not of itself absolve the legitimacy of the matter from being discussed at another local planning authority LP Examination.
3. There is no argument with the LPA insofar that a site that is developed during the plan period, in this instance 2011-2028, will count towards the Core Strategy requirements.

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4. The substantive issue is whether a site that was allocated in a previous LP, but is proposed to be rolled forward into the new LP, because it remains undeveloped, has a realistic prospect of being brought forward within the new plan period, or whether it is more appropriate for it to be dealt with as a potential “windfall” housing or employment site as the case may be. Where sites that have previously demonstrated historical delivery uncertainty but continue to be allocated in a subsequent LP, there is a high likelihood that such a continued allocation could be to the detriment of delivering the plan strategy insofar that insufficient land is then brought forward and developed during the plan period.
5. The validity of the approach on a site-specific basis was discussed at the Examination in respect of both housing and employment sites, and the Inspector will no doubt draw her own conclusions within the Examination Report.

#### **Action M2A6: Matter 2- Employment**

6. Examination Library document, BBC/08, published as late as November 2018 by BBC clearly denotes Modification MM3 striking through of the text in the first bullet point making provision for a minimum of 18,000 m<sup>2</sup> of B class employment space at Toton. This is on the basis that the development is anticipated to occur post 2028 beyond the LP plan period. Indeed, such propensity to back load such delivery is indicated by BBC within the first paragraph of the M2A6 considering the Master plan Approach and which reconfirms the quantum of employment land for both Chetwynd Barracks and Toton Strategic Growth Location will be determined as part of the masterplan and ACS Review processes. The statutory requirement is to ensure provision of delivery of the existing ACS requirement within the Pt2 LP period and not leave it to be addressed within a successor plan.
7. There is no certainty relating to the employment land provision required from the current ACS delivery of 18,000 m<sup>2</sup> at Toton and forming part of the overall ACS Policy 4 b) requirement for the provision of 34,000 m<sup>2</sup> of office development within Broxtowe during

the Pt2 LP period of 2011-2028. As a consequence, alternative employment provision is required in order to provide certainty and to enable the plan to be Sound.

8. This aspect was discussed in detail at the Examination and the Inspector will no doubt draw her own conclusions within the Examination Report.

Should you wish to discuss any aspect of these responses, 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**



CC. Simon Bingham – Chairman, Caunton Engineering Ltd  
Chris Foulds – Foulds Investments Ltd, Whithead Concrete Ltd