

Action M2A1: Matter 2 – Employment

- **Clarify that, once constructed, the committed employment land sites will be protected by Policy 9 and list within the supporting text.**

Add text to paragraph 9.1:

Once completed, all committed employment sites will be protected by Policy 9.

Committed sites which have not yet been completed, such as Nottingham 26 (Mushroom Farm), are already included within the list on the following page (page 83 of the Part 2 Local Plan).

Action M2A2: Matter 2 – Employment

- **Confirm the total amount of space (17ha or 23ha) in relation to Mushroom Farm outline planning permission.**

The site area of the outline planning permission has been checked and the Council can confirm that the area is 23.4 ha (as mentioned at paragraph 1.6 of the Council's 'Response to Matter 2: Employment', MA02/BBC). This is consistent with the area shown on the Policies Map.

Action M2A3: Matter 2 – Employment

- **Provide a note confirming the approach to the employment land requirement in the Aligned Core Strategy.**

Joint statement of Broxtowe and Gedling Borough Councils and Nottingham City Council

The approach taken is that the provision to meet Core Strategy requirements should include all development from the start of the plan period (2011). Therefore, all employment development that is delivered between 2011 and 2028 counts towards the Core Strategy requirements. This is the case regardless of whether or not the site concerned had planning permission at 2011 and regardless of whether or not it was allocated in a previous Plan.

This approach has been applied consistently by the Greater Nottingham Councils and by their specialist consultants through joint working and commissioning of the evidence base.

This approach is illustrated by Gedling's adopted [Local Planning Document \(LPD\)](#). During Gedling's examination hearings, there was no discussion about the approach to the employment land requirements, as it was treated as a given that the approach described above was correct. This is reflected in paragraphs 220-223 of the [Inspector's Report \(RD/09\)](#), which deal with 'Employment Provision and Distribution' and which make no reference to the issue. Paragraph 12.1.2 of Part A of the LPD (page 121) makes clear that, together with the strategic allocations in the Core

Strategy, the allocations in Policy LPD 71 meet the Core Strategy requirements. Policy LPD 71 (page 186) specifically includes one site (at Hillcrest Park) which (as explained at paragraph 10.6 of Part B, page 187) was allocated in a previous Plan and another site (at Teal Close) which (as explained at paragraph 10.9 of Part B, page 187) already had planning permission. This was considered entirely appropriate by the inspector.

Similarly, there was no discussion about the approach during Nottingham City's examination hearings, again because it was treated as a given that the approach described above was correct. Appendix 4 (pages 314-319) of the City Council's [Local Plan Part 2 \(Submission Version 2018\)](#) sets out the approach to employment land, and clearly shows that development completed since 2011 is included as part of the supply.

This approach is consistent with the approach to housing development in Broxtowe's Part 2 Local Plan, in which all housing development that is delivered between 2011 and 2028 counts towards the Core Strategy requirements.

This approach is also consistent with the national Planning Practice Guidance (PPG) on 'Housing and economic land availability assessment', which treats the two types of development in the same way. At paragraph 012 (ID: 3-012-20140306), the [PPG](#) includes a table (showing types of sites and sources of data for assessment), which takes the same approach to allocations for both "housing and economic development" (without distinguishing whether or not they have been previously allocated) and to permissions for both "housing and economic development" (without distinguishing whether or not development has started).

Confirmation from the Planning Policy and Research Manager at Nottingham City Council and the Principal Planning Officer at Gedling Borough Council, of endorsement of this statement, is provided in Appendix A below.

APPENDIX A

From: Matt Gregory
Sent: 15 January 2019 09:10
To: Lawson, Dave; Graeme Foster
Subject: RE: Approach to the employment land requirement in the Aligned Core Strategy

Dear Mr Lawson

I confirm that the statement below sets out the agreed position with regard to employment land supply across Greater Nottingham.

Regards.

Matt

Matt Gregory
Planning Policy and Research Manager
Planning Services
Nottingham City Council
Loxley House
Station Street
Nottingham
NG2 3GN

From: Graeme Foster
Sent: 15 January 2019 09:15
To: Lawson, Dave; Matt Gregory
Cc: Alison Gibson; Joanna Gray
Subject: RE: Approach to the employment land requirement in the Aligned Core Strategy

Dear Mr Lawson

I confirm that the statement below sets out the agreed position with regard to employment land supply across Greater Nottingham.

Yours sincerely,

Graeme Foster
Principal Planning officer
Planning Policy
Gedling Borough Council
Civic Centre, Arnot Hill Park
Arnold, Nottingham NG5 6LU

From: Lawson, Dave
Sent: 15 January 2019 09:05
To: Matt Gregory

Graeme Foster

Subject: Approach to the employment land requirement in the Aligned Core Strategy

Dear Mr Gregory and Mr Foster,

I would be grateful if you could confirm your endorsement of the joint statement below, which is in response to the request of the Inspector of the Broxtowe Part 2 Local Plan for a note confirming the approach to the employment land requirement in the Aligned Core Strategy.

Joint statement of Broxtowe, Gedling and Nottingham City Councils

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The approach taken is that the provision to meet Core Strategy requirements should include all development from the start of the plan period (2011). Therefore, all employment development that is delivered between 2011 and 2028 counts towards the Core Strategy requirements. This is the case regardless of whether or not the site concerned had planning permission at 2011 and regardless of whether or not it was allocated in a previous Plan.

This approach has been applied consistently by the Greater Nottingham Councils and their specialist consultants through joint working and commissioning of the evidence base.

This approach is illustrated by Gedling's adopted [Local Planning Document \(LPD\)](#). During Gedling's examination hearings there was no discussion about the approach to the employment land requirements, as it was treated as a given that the approach described above was correct. This is reflected in paragraphs 220-223 of the [Inspector's Report \(RD/09\)](#), which deal with 'Employment Provision and Distribution' and which make no reference to the issue. Paragraph 12.1.2 of Part A of the LPD (page 121) makes clear that, together with the strategic allocations in the Core Strategy, the allocations in Policy LPD 71 meet the Core Strategy requirements. Policy LPD 71 (page 186) specifically includes one site (at Hillcrest Park) which (as explained at paragraph 10.6 of Part B, page 187) was allocated in a previous Plan and another site (at Teal Close) which (as explained at paragraph 10.9 of Part B, page 187) already had planning permission. This was considered entirely appropriate by the inspector.

Similarly, there was no discussion about the approach during Nottingham City's examination hearings, again because it was treated as a given that the approach described above was correct. Appendix 4 (pages 314-319) of the City Council's [Part 2 Local Plan \(Submission Version 2018\)](#) sets out the approach to employment land, and clearly shows that development completed since 2011 is included as part of the supply.

This approach is consistent with the approach to housing development in Broxtowe's Part 2 Local Plan, in which all housing development that is delivered between 2011 and 2028 counts towards the Core Strategy requirements.

This approach is also consistent with the national Planning Practice Guidance (PPG) on 'Housing and economic land availability assessment', which treats the two types of development in the same way. At paragraph 012 (ID: 3-012-20140306), the [PPG](#) includes a table (showing types of sites and sources of data for assessment) which takes the same approach to allocations for both "housing and economic development" (without distinguishing whether or not they have been previously allocated) and to permissions for both "housing and economic development" (without distinguishing whether or not development has started).

Regards,

David Lawson
Team Leader (Planning Policy) x3452

MATTER 2 – EMPLOYMENT

Action M2A4:

Provide historic evidence in relation to the amount of the reuse of land within town centres for office purposes within the last 5 to 10 years.

Council's Response:

The format and content of the Council's Annual/Authority Monitoring Reports have varied over the past ten years, so information is not available in identical form for every year. However all the relevant and available information is included in the table below.

Year	Completed office floorspace within town centres
2017-18	B1 offices: None A2 offices: None Mixed B1/A2 offices: 45 sq m
2016-17	B1 offices: 137 sq m A2 offices: 549 sq m
2015-16	B1 offices: None A2 offices: 102 sq m
2014-15	B1 offices: None A2 offices: 98 sq m
2013-14	B1 offices: None A2: 106 sq m
2012-13	Offices (B1 & A2): 265 sq m
2011-12	B1 offices: None A2 offices: Not known
2010-11	Offices (B1 & A2): 2110 sq m
2009-10	B1 offices: None A2 offices: 89 sq m
2008-09	B1 offices: None A2 offices: None

Action M2A5: Provide a background note containing sustainability appraisal position and background information available for the following sites: Former Bennerley Coal Disposal Point, Caunton Engineering and Whitehead Concrete Ltd

Background to the ACS

1. The [Greater Nottingham Sustainable Locations for Growth Study \(GB/02\)](#) considered all potential directions for growth around settlements, including Awsworth and Eastwood. This study, along with others, was undertaken in anticipation of releasing land from the Green Belt for housing growth. However, the findings of this work remain highly relevant for consideration of Green Belt boundary changes for other development types, including employment.
2. At page 55 of the Study, directions for growth in Eastwood are considered. This includes recommendations to consider land to the north and north east of the town.
3. At page 57, directions for growth at Awsworth are considered, including recommendations to include land to the west, but with a clear recommendation that this should be restricted to land inside the bypass. It was recommended to avoid all areas to the north.

Background to the Part 2 Local Plan

4. The Greater Nottingham Sustainable Locations for Growth Study was included as evidence to the Issues and Options Consultation in November 2013.
5. Please also see page 72 of the main report of the [Sustainability Appraisal \(CD/12\)](#), for a plan (Map 2), which shows the '*sites which have not been assessed in detail through the Sustainability Appraisal as they are not considered to be 'reasonable alternatives''*.
6. Sites included on this plan include the land at Bennerley (Former Coal Disposal Point) and surrounding land including the Gin Close Way Site. It also includes land adjacent to the Caunton Engineering site.

7. Please also see paragraph 8.20 on page 74 for further details. This paragraph also refers to a plan on page '82'; this should read page '72' and will be corrected.
8. The [Green Belt Review \(GB/03\)](#) to inform the Part 2 Local Plan was again undertaken in anticipation of needing to release land for housing, but the findings remain relevant to any Green Belt boundary changes for any type of use. The landscape character appraisal work ([LA/01](#) and [LA/02](#)) again considered all potential areas for growth, irrespective of the reasons for it.
9. The Council maintains the position that there is more than sufficient land within the urban area to meet the employment needs of the Borough, as set out in Policy 4 of the [ACS \(PD/01\)](#). Given that there are sufficient sites to meet this need in the urban area, it is not considered to be a 'reasonable alternative' to release further land from the Green Belt, as this would be unnecessary. However, for completeness, the Council has undertaken site-specific Sustainability Appraisals for employment development at the three sites; the details of these assessments are shown below.

Additional text in response to comments by iPlan Solutions (29 January 2019):

Business Expansion within the Green Belt

10. Senior Officers and Councillors have previously met representatives of Caunton Engineering Ltd and suggested that the business needs of Caunton (for more space) appeared to amount to a case towards meeting the 'very special circumstances' to support an extension in the Green Belt, and this should be tested in a planning application. These discussions took place during 2014 and 2015 and some 4 years later, no such application has been received by the Borough Council.
11. However, during this same period, the Council has (recently) granted planning permission for an extension to the premises of Aero Fabrications Ltd ([reference 18/00176/FUL](#), decision date: 24 July 2018), which is also situated within the Green Belt. The Council recognises the importance of allowing such high-tech and high-knowledge businesses (such as Aero Fabrications Ltd and Caunton Engineering Ltd) to be able to expand their operations, even when the land to accommodate this expansion is located within the Green Belt. This can amount to the 'very special circumstances' needed in order to allow inappropriate development in the Green Belt, as was the case with the planning decision at Aero Fabrications.
12. As previously stated, the Council does not consider it to be necessary or appropriate to remove further land from the Green Belt for employment purposes, especially as the Aligned Core Strategy requirement for the period up until 2028 can already be

accommodated through urban sites and a strategic masterplan approach at Toton and Chetwynd Barracks within the Plan during this period.

13. The Council is also concerned that, were land adjacent to existing employment-related premises within the Green Belt to be removed from the Green Belt based on the needs of the business in question, rather than on the purposes of including land in the Green Belt in line with the agreed methodology within the Greater Nottingham and Ashfield Green Belt Assessment Framework, there is a substantial risk that a business might choose to dispose of both its existing premises and any additional land, which in such a case would no longer be protected by the Green Belt designation, for residential or indeed other uses.
14. The approach of the Council is therefore for such sites to be retained within the Green Belt, whilst accepting that businesses within the high-tech and high-knowledge sectors may need to expand, and accordingly treating such proposals sympathetically, as part of the Development Management process. The planning permission for the development at Aero Fabrications Ltd demonstrates the Council's commitment to ensuring that the Borough's businesses do have the opportunity to expand, and Policies 8 and 9 of this Part 2 Local Plan allow for these appropriate decisions to be taken.

Sustainability Appraisal

15. The Council notes that the Sustainability Appraisal (SA) is a tool for comparing the sustainability of sites to ensure that development (both for housing and other types of uses, including employment) occurs in the most sustainable locations within the Borough. The most sustainable locations for housing and employment are within existing urban areas. It is the Council's case that Green Belt changes are needed to meet housing need, but are not needed for employment, other than at Toton (SA for Toton, PD/16), as considered through the Aligned Core Strategy (PD/01). Therefore, whilst the 'exceptional circumstances' to justify Green Belt boundary changes for housing need are met, they are not met for employment need. It is necessary to compare all SA sites using the same criteria in order to make fair, balanced and consistent assessments. This approach has been undertaken by the Council.

Sustainability Appraisals

Sites:

- **Former Bennerley Coal Disposal Point, Awsworth (Rail-Related Employment Use)**
- **Land to the West of Gin Close Way, Awsworth, including land occupied by R Whitehead Concrete Ltd (currently in Employment Use)**
- **Land to the North West and West of Lamb Close Drive, immediately North West of Caunton Engineering (Expansion Land)**

Broxtowe Borough Council


Updated 31 January 2019

SA Objectives	Comments	Ideas for mitigation
1. Housing	The development of the site would be for employment purposes only. As there is currently no residential development on the site, this objective is ranked as neutral.	Not applicable.
2. Health	An area of unofficial open space well-used by walkers / dog walkers would be lost; this would potentially have a negative impact upon the health of the local community.	Retain footpaths around and adjacent to the site.
3. Heritage	<p>The site is adjacent (within 50m) to the Grade II* Listed Bennerley Viaduct. Any development would impact upon the view of the viaduct, especially from the northeast.</p> <p>It should be noted that the Grade II* Listed Bennerley Viaduct is one of only two surviving wrought iron viaducts in the UK.</p> <p>The historical setting of the viaduct was previously 'industrial', with railway sidings. Were the proposed development to consist solely of railway sidings, it could be argued that the impact upon the heritage objective would be more limited; after all, this would replicate the historic setting of the viaduct.</p> <p>However, it is considered that the construction of large-scale modern commercial buildings would negatively impact upon both the structure and its setting, including potentially completely removing views of the structure from some directions.</p>	<p>Avoid development in close proximity to the viaduct.</p> <p>Development of footpath links from the viaduct to surrounding areas.</p>
4. Crime	There is currently evidence of anti-social behaviour on the site, including the use of off-road motorbikes and powered go-karts. There is also evidence of fly-tipping and litter at the site. Developing the site could resolve these issues as well as providing the funding to remediate the site and surrounding area.	
5. Social	There is evidence of unofficial, informal use of the site for social uses, including the walking of dogs. Whilst this use may not be directly authorised by the site owner, it is considered that the loss of the site would result in a social loss to the local community.	Retention of footpath and cycleway links in and around the site, including linking the Bennerley Viaduct.

SA Objectives	Comments	Ideas for mitigation
6. Biodiversity & Green Infrastructure	<p>78.15% (17.33ha) of the site is within the Bennerley Coal Processing Plant and Grassland Local Wildlife Site (reference 5/2141). This is 'a former mine site supporting a wide range of habitats of botanical and zoological importance'. (Part of the access road to the site is outside of this designation). This designation covers the site as well as land to the north east and land to the south of the Bennerley Viaduct, and so the development of the site would cause significant harm to this Local Wildlife Site.</p> <p>7.47% (1.66ha) of the site is located within the Bennerley Wet Grassland Local Wildlife Site (reference 5/3344: A wet grassland pasture of note by the River Erewash)</p> <p>Based upon the current site boundary, some 0.07% (0.02ha) of the site is within the Nottingham Canal Local Nature Reserve (Confirmed 1993); this Local Nature Reserve is also located adjacent to parts of the site. The Smithurst Meadows Local Nature Reserve (Confirmed 2010) is located within 100m of the site. The Nottingham Canal (Awsorth and Cossall) Local Wildlife Site (a 'Species-rich disused canal of botanical and zoological importance') is located within 50m of the site</p> <p>Five Green Infrastructure Corridors cross the site:</p> <ul style="list-style-type: none"> • 13.44m of 2.20 Smithurst Road and Daisy Farm Brook Giltbrook crosses the site • 19.12m of 2.13 Langley Mill to Kimberley crosses the site • 89.84m of 2.7 Nuthall Cutting and Kimberley Railway crosses the site • 96.85m of 1.2 Erewash Valley crosses the site • 846.76m of 2.8 Kimberley Cutting crosses the site <p>Green Infrastructure Corridor 2.9 Nottingham Canal is located within 100m of the site. Public rights of way both run adjacent to, and also across, the site.</p>	<p>Locate built development away from the Nottingham Canal Local Nature Reserve and enhance the boundary treatments to protect the Green Infrastructure Corridors.</p> <p>Avoid the most valuable parts of the Local Wildlife sites.</p> <p>Retention, where possible, or diversion of public rights of way.</p>

SA Objectives	Comments	Ideas for mitigation
	<p>6 public rights of way cross the site:</p> <ul style="list-style-type: none"> • 9.27m of GreasleyBW50 (BW) crosses the site • 10.66m of GreasleyFP53 (FP) crosses the site • 16.4m of AwsworthFP12 (FP) crosses the site • 118.76m of GreasleyFP65 (FP) crosses the site • 186.19m of AwsworthFP10 (FP) crosses the site • 573.55m of AwsworthBW17 (BW) crosses the site <p>A further 12 public rights of way pass within 250m of the site. Some 7 of these pass within 50m of the site.</p> <p>Given the level of biodiversity and green infrastructure provision on and immediately adjacent to the site, it is considered that there would be substantial potential for loss or damage. Therefore, the effect on this objective has been scored as 'moderate to major' negative.</p>	
7. Environment Landscape	<p>The site is located within wider Site LS22, as assessed within the 'Landscape and Visual Analysis of Potential Development Sites', which was produced by AECOM on behalf of Broxtowe Borough Council in January 2017.</p> <p>This Assessment concludes that this wider site area has a medium landscape value, visual value, visual susceptibility, landscape sensitivity, and visual sensitivity, but a high landscape susceptibility.</p> <p>Accordingly, the effect on this objective has been scored as 'moderate negative', consistent with the SA appraisals for other sites.</p>	<p>Locate development away from the viaduct to minimise harm to the viaduct and its setting.</p>

SA Objectives	Comments	Ideas for mitigation
8. Natural Resources & Flooding	<p>The site is a brownfield site by virtue of its previous industrial and historic rail-related uses. There is evidence of infrastructure (including a two lane concrete highway linking the site with the A610 and a number of concrete 'roads' within the site). There is also evidence of open storage on small parts of the site (including the storage of concrete railway sleepers). The remains of some brick and concrete structures can also be seen within certain, small parts of the site. It could be argued that the development of this site would prevent the need to develop greenfield sites elsewhere.</p> <p>Parts of the site within areas of flooding:</p> <ul style="list-style-type: none"> • 5.27% (1.17ha) of site is in Flood Zone 3 • 31.02% (6.88ha) of site is in Flood Zone 2 <p>Coal Referral Area:</p> <p>98.85% (21.91ha) of the site is in a Coal Referral Area (high risk)</p> <p>Concrete covers large parts of the site, as can be seen from the aerial plan on the following page.</p>	

SA Objectives	Comments	Ideas for mitigation
	 <p data-bbox="465 1169 1948 1203">Above: Aerial photograph of the southern part of the site, showing the extent the concrete 'hard-standing'</p>	
9. Waste	There may be contamination at the site due to its previous history. There is also evidence of fly-tipping on the site. The development of the site would enable the remediation of the site.	
10. Energy & Climate Change	It could be argued that the development of rail-related infrastructure will further reduce the need for road-based travel and carriage of freight by road.	


SA Objectives	Comments	Ideas for mitigation
11. Transport	<p>The development of the site for rail-related development could enhance the rail-related infrastructure provision within the Borough and region, provided that it is technically-feasible to provide such infrastructure at this site.</p> <p>The site is well connected by public footpaths and already has reasonably good access to the strategic highway network via an existing two lane concrete highway connecting to the westbound carriageway of the A610 dual carriageway. There are bus stops within 250m of the site.</p> <p>Ilkeston Railway Station is located less than 2km from the site by foot (using existing footpaths).</p>	
12. Employment	The development of the site would create employment opportunities for the Borough and surrounding areas.	
13. Innovation	The development of the site has the potential to create jobs within high-knowledge sectors and to encourage graduates to live and work within the Borough.	
14. Economic Structure	The site is located in close proximity to the A610. The development of the site would provide infrastructure for rail-related businesses.	

SUSTAINABILITY APPRAISAL – Allocation of Land West of Gin Close Way (A6096), including land occupied by R Whitehead Concrete Ltd, Awsorth – For Employment Use

														Very major/important positive
														Major positive
														Moderate to major positive
														Moderate positive
														Minor positive
1. Housing	2. Health	3. Heritage	4. Crime	5. Social	6. Biodiversity & Green Infrastructure	7. Environment and Landscape	8. Natural Resources & flooding	9. Waste	10. Energy	11. Transport	12. Employment	13. Innovation	14. Economic Structure	? = unknown impact No fill = negligible impact or not relevant
														Minor negative
														Moderate negative
														Moderate to major negative
														Major negative
														Very major/important negative

SA Objectives	Comments	Ideas for mitigation
1. Housing	The site is currently in employment use only. However, by formally allocating the site for employment use, this would restrict the use of the site to employment uses. Most of the site is, however, located within Flood Zone 3.	
2. Health	It is considered that the allocation of the site would not result in any impact upon the health objective.	
3. Heritage	It is considered that the allocation of the site would not impact upon any designated or non-designated heritage assets.	
4. Crime	It is considered that the allocation of the site would not impact upon the crime objective.	
5. Social	The site is located within reasonably close proximity to the village of Awsworth.	
6. Biodiversity & Green Infrastructure	<p>Two Green Infrastructure Corridors cross the site from east to west (one to the north and one to the south of the site). These are:</p> <ul style="list-style-type: none"> • 49.49m of 2.13 Langley Mill to Kimberley crosses the site • 88.91m of 2.8 Kimberley Cutting crosses the site <p>The Gilt Brook runs adjacent to part of the site.</p> <p>A public right of way runs adjacent to the northern and north western boundary to the site. A total of 4 public rights of way pass within 250m of the site:</p> <ul style="list-style-type: none"> • GreasleyFP58 (FP) within 50m of the site • AwsworthFP14 (FP) within 250m of the site • KimberleyFP58 (FP) within 250m of the site • GreasleyFP59 (FP) within 250m of the site <p>The site does not include, and would not impact upon, any Local Wildlife Sites, Local Nature Reserves or Tree Preservation Orders. Therefore, the effect upon this objective has been scored as 'neutral'.</p> <p>The nearest Local Wildlife Site to the site is Glasshouse Yard Grassland,</p>	Enhancement of boundary treatment to enhance the GI Corridors and public rights of way.

SA Objectives	Comments	Ideas for mitigation
	<p>Awsworth (2/256 'A notable herb-rich community'), which is located within 250m of site.</p>	
<p>7. Environment Landscape</p>	<p>The site itself is currently in employment use and includes a significant amount of open storage including the storage of motorhomes.</p> <p>The site is located within the wider Site LS22, as assessed within the 'Landscape and Visual Analysis of Potential Development Sites', which was produced by AECOM on behalf of Broxtowe Borough Council in January 2017. This Assessment concludes that this wider site area has a medium landscape value, visual value, visual susceptibility, landscape sensitivity, and visual sensitivity, but a high landscape susceptibility.</p> <p>Accordingly, and despite the previously-developed state of the site, the effect on this objective has been scored as 'moderate negative', to ensure consistency with the SA appraisals for all other sites.</p>	
<p>8. Natural Resources & Flooding</p>	<p>This brownfield site appears to be fully occupied with commercial uses including open storage of vehicles. It is therefore not considered that its allocation would reduce the need for the development of other sites within greenfield or less sustainable locations.</p> <p>Coal Referral Areas:</p> <p>99.47% (1.96ha) of the site is located within a Coal Referral Area (high risk).</p> <p>Areas of flooding:</p> <ul style="list-style-type: none"> • 75.87% (1.49ha) of the site is in Flood Zone 3 • 78.68% (1.55ha) of the site is in Flood Zone 2 	
	<p>An aerial plan of the site is shown below.</p>	

SA Objectives	Comments	Ideas for mitigation
	 <p data-bbox="488 1098 2078 1117">© Crown Copyright and database right 2019. Ordnance Survey 100019453. You are not permitted to copy, sub-license, distribute or sell any of this data to third parties in any form. FOR BROXTOWE BOROUGH COUNCIL BUSINESS USE ONLY 1:800</p> <p data-bbox="488 1149 1653 1189">This illustrates the amount of the site which currently consists of 'open storage'.</p>	
9. Waste	<p data-bbox="488 1217 1653 1396">The allocation of the site might lead to the comprehensive redevelopment of the site, which could result in additional waste. However, as it is considered likely that the existing buildings / businesses would remain on site, at least in the short-term, any allocation would not result in any significant impacts in terms of 'waste'. Were the entire site to be redeveloped, then this would result in the generation of</p>	


SA Objectives	Comments	Ideas for mitigation
	<p>additional waste, but would also involve any necessary remediation of the land.</p> <p>There are approximately 10 buildings of various sizes currently located on the site.</p>	
10. Energy & Climate Change	It is not considered that there would be any significant impact (either positive or negative) in relation to the 'energy & climate change' objective.	
11. Transport	The site is located on Gin Close Way, which is served by public transport. Public rights of way also run adjacent to the site. The nearest bus stop is located just 7m from the site.	
12. Employment	<p>As the site is already in employment use, it already provides jobs to the local community. The allocation of the site for employment use may lead to an intensification of employment-related uses on site and so therefore additional employment opportunities may be generated. However, due to the size of the site and the fact that it is already in use for employment purposes, it is not considered that a substantial number of new jobs would be generated, unless the site is comprehensively redeveloped.</p> <p>There currently appear to be three different businesses located on this site, including R Whitehead Concrete Ltd and Oaktree Motorhomes.</p>	
13. Innovation	There would be the potential for high-knowledge employment opportunities to be generated at the site, were the site to be comprehensively redeveloped.	
14. Economic Structure	An allocation would provide certainty to local businesses based on the site, specifically enabling them to prepare expansion plans. It should be noted that Permitted Development Rights have been withdrawn in relation to at least one property on the site. An allocation of employment use could benefit potential future occupiers of the site.	

SUSTAINABILITY APPRAISAL – Allocation of Land to the North West and West of Lamb Close Drive, immediately North West of Caunton Engineering – For Employment Use

														Very major/important positive
														Major positive
														Moderate to major positive
														Moderate positive
														Minor positive
1. Housing	2. Health	3. Heritage	4. Crime	5. Social	6. Biodiversity & Green Infrastructure	7. Environment and Landscape	8. Natural Resources & flooding	9. Waste	10. Energy	11. Transport	12. Employment	13. Innovation	14. Economic Structure	? = unknown impact No fill = negligible impact or not relevant
														Minor negative
														Moderate negative
														Moderate to major negative
														Major negative
														Very major/important negative

SA Objectives	Comments	Ideas for mitigation
1. Housing	The development of the site would be for employment use only. As there is currently no residential development on the site, this objective has been scored as 'neutral'.	
2. Health	It is considered that the development of the site would not result in any significant health impacts.	
3. Heritage	It is considered that the development of the site would not impact upon any designated or non-designated heritage assets.	
4. Crime	It is considered that the development of the site would not significantly impact upon the crime objective.	
5. Social	It is considered that the development of the site would not significantly impact upon the social objective.	
6. Biodiversity & Green Infrastructure	<p>100% (7.17ha) of the site is comprised of Grade 4 Agricultural Land.</p> <p>The site is located completely outside of the boundaries of Local Nature Reserves and Local Wildlife Sites, although the Colliers Wood Local Nature Reserve (Confirmed 2012) is located within 250m of site, and the Dumbles Local Wildlife Site (2/278 'A notable wildlife area incorporating pools, swamp and woodland') is located within 100m of site. Two further Local Wildlife Sites (Beauvale Brook Marsh, Eastwood and Nether Green Brook) are located within 250m of the site.</p> <p>Public rights of way run along the south western boundary (outside the site) and north eastern boundary (inside the site boundary): 262.03m of GreasleyFP90 (FP) crosses the site. A total of 10 public rights of way pass within 250m of the site.</p> <p>The site does not include any Local Wildlife Sites, Local Nature Reserves or Tree Preservation Orders. Therefore, this objective has been scored as 'neutral'.</p>	<p>Enhancement of boundary treatment to enhance the GI Corridors and public rights of way.</p> <p>Retention of existing public rights of way.</p>

SA Objectives	Comments	Ideas for mitigation
7. Environment Landscape	<p>The site is located within the wider Site LS38, as assessed within the 'Landscape and Visual Analysis of Potential Development Sites', which was produced by AECOM on behalf of Broxtowe Borough Council in January 2017.</p> <p>This Assessment concludes that this wider site area has a medium landscape value, landscape susceptibility, visual susceptibility, and landscape sensitivity, and a low visual value and visual sensitivity.</p> <p>Accordingly, the effect on this objective has been scored as 'moderate negative', consistent with the SA appraisals for other sites.</p>	
8. Natural Resources & Flooding	<p>Areas of flood risk:</p> <p>A very small amount of the site (to the south east) is located within Flood Zone 2. 0.01% of the site is in Flood Zone 2.</p> <p>Coal Referral Area:</p> <p>99.87% (7.17ha) of the site is located within a Coal Referral Area (high risk).</p>	
9. Waste	<p>The site comprises greenfield land and so therefore there would not be any impact in relation to the waste objective, unless the demolition of the Cauntton Engineering's existing building, which is situated immediately to the south east were to be required in order to facilitate access to this site.</p> <p>Below is an aerial photograph of the site and surrounding areas.</p>	

SA Objectives	Comments	Ideas for mitigation
	 <p data-bbox="544 1155 1406 1171">© Crown copyright and database right 2019. Ordnance Survey 100019453. You are not permitted to copy, sub-license, distribute or sell any of this data to third parties in any form.</p> <p data-bbox="544 1171 1406 1203">Aerial photograph of the site and surrounding areas.</p>	
10. Energy & Climate Change	<p>It is considered that the development of the site would not significantly impact upon the energy & climate change objective.</p>	

SA Objectives	Comments	Ideas for mitigation
11. Transport	<p>There are public rights of way within close proximity to the site. It appears that currently the only access to the site is an agricultural access. The site is not located adjacent to any adopted highways.</p> <p>It has been assumed that the access to the site would be via the existing Caunton Engineering works, via highways in 'private' control (i.e. not adopted).</p> <p>There are no nearby rail services, although there are bus services within 500m of the site. The nearest bus stop is located 315m from the site.</p>	
12. Employment	<p>The allocation of the site would allow Caunton Engineering to expand its own operations, but due to the location of the land in relation to the existing premises, and the distance from the nearest adopted highways, it is not considered that it would be viable for the site to be developed for the use of any other separate businesses. Any employment generation would therefore be entirely reliant upon Caunton Engineering expanding.</p>	
13. Innovation	<p>The allocation of the site would enable Caunton Engineering (a high-knowledge business) to expand its operations.</p>	
14. Economic Structure	<p>It is assumed that the development site would only be available to Caunton Engineering, rather than to any other businesses.</p> <p>The site is located almost 3km from the A610.</p>	

Broxtowe Borough Council

Updated: January 2019

M2A6 Provide a note confirming the approach to employment land contingencies required for businesses needing to relocate as a result of HS2.

Introduction

In the Council's response to question 1 of Matter 2 (Employment), details of the supply of employment land were provided which demonstrate a buffer for the supply of employment land. Paragraph 1.11 of the Council's hearing statement provides the details: <https://www.broxtowe.gov.uk/media/5696/ma02-bbc-matter-2-employment-a.pdf>.

HS2 Ltd Working Draft Environmental Statement (WDES)

HS2 Ltd has recently consulted upon its WDES, which identifies the likely significant environmental effects to be caused by the construction and operation of the HS2 railway, and proposes mitigation to reduce or minimise the effects.

The WDES is a 'snap-shot in time' and presents a 'worst case scenario' position. HS2 Ltd acknowledges that further environmental assessments and design work will be undertaken in advance of the formal Environmental Statement which is needed to accompany the deposit of the hybrid Bill. The WDES shows an access to the proposed station from the A52 which would have an impact on existing employment units.

Broxtowe Borough Council, and partner authorities through 'East Midlands Councils', raised concern regarding the current approach set out in the WDES to land take and highways design, as this approach is unlikely to address the scale of development associated with the growth strategy and the likely background growth on the A52 and M1 J25 over the next 25 years. The final access arrangements to the station have not been confirmed at this stage. Both 'Transport for the East Midlands' and 'Midlands Connect' have recommended that Government make available development funding in RIS2 (2020-25) to enable Highways England and HS2 Ltd to work together on an integrated scheme for the A52 / M1 that will meet long term growth pressure in the context of the multi-modal strategy developed through the East Midlands Gateways Connectivity Study.

In addition, the Housing Infrastructure Fund Bid being progressed by Nottinghamshire County Council, seeks to deliver the aspirations of the Growth Strategy in relation to infrastructure, including an alternative access to the station via land allocated in the Part 2 Local Plan, within the Strategic Location for Growth, which would mean that the loss of employment land as currently suggested by the WDES could be minimised.

Masterplan approach

The approach agreed through Actions M6A2 and M7A2, requiring a Masterplanned approach to development for both Chetwynd Barracks and the Strategic Location for Growth at Toton, means that development will be undertaken in a cohesive and coordinated way. This will mean that once Masterplan(s) are agreed, significant quantities of new employment land will be available for development and will be able to be delivered at pace. Although the final quantum of employment land will be determined as part of the masterplan and ACS review processes, this provision will

significantly exceed the minimum 18,000 square metres of employment land specified in the ACS for Toton.

WDES details

Even if development were to proceed as per the WDES, the amount of B Class employment land to be lost, (from 2025 onwards), would be as follows:

Name/Address of Business	Use Class	Area (ha)
UPS Stapleford	B8	0.8
MF Knitting co Ltd	B1	0.08
Autoreel	B2	0.19
Eagle Scientific 14 Bessell Lane	B2	0.09
G D Precision Engineering 4 Bessell Lane	B2	0.02
Chambers Pencils J Looker & Sons	B2	0.38
Kennelpak Ltd	B2	1.9
Key Security Bessell Lane	B1	0.09
Champion Hire	B1	0.25
Anglia Roofing 12A Bessell Lane	B8	0.09
8 Bessell Lane – GDR Door services – installation repair of industrial doors	B1	0.06
Maple Leaf Works Bessell Lane	B2	0.12
Railway Maintenance Depot (north of the A52)	B8	0.89
Total		4.96

The Council has reviewed the AECOM report as submitted by Spawforths, and as stated in the hearings, the majority of the businesses that have been identified by AECOM as being displaced, are not located within Broxtowe Borough, with most being within Erewash Borough. Many of the businesses are not in B Class employment use and only one (which is included in the table above for 0.8ha, Balfour Beatty Railway Maintenance Depot) has a rail link.

Whilst the relocation of the DB Cargo land is an aspiration of the East Midlands Growth Strategy, this is not a requirement either for HS2 construction or operation, (as outlined in a statement released by DB Cargo: https://uk.dbcargo.com/rail-uk-en/News_Media/news/Planning-together-for-the-future-of-Toton-2101548). This is a regional ambition which is not required in the short term, within this plan period; indeed, if the business does relocate, there is no operational reason to require this to be within Broxtowe.

Conclusion

The businesses that are potentially displaced as a result of HS2 are mainly in manufacturing use. There is an overprovision of land in manufacturing and warehousing use in Broxtowe for the period up until 2028. This will remain the case, even if all of the businesses referred to above are displaced. If this displacement does occur, the masterplan approach and the review of the Core Strategy are the appropriate ways of ensuring replacement provision is provided.