

INDEPENDENT EXAMINATION OF THE GEDLING LOCAL PLANNING DOCUMENT (PART 2 LOCAL PLAN)

Representations on behalf of Ibstock Group Limited

Comment ID lpd_pub_b/269

Revised Housing Background Paper Addendum, March 2017, and Revised Policy LPD 63 (Housing Distribution)

Preamble

- 1. The Inspector has asked for consideration with regards a Revised Housing Background Paper and policy modification which includes updated information as to the 5 year housing supply trajectory.**
- 2. Ibstock have submitted a series of papers throughout the EIP and attended a number of relevant sessions in order to highlight concerns in relation to certain proposed housing sites in close proximity to the operational quarry and brick factory.**
- 3. It is clear that the proposed allocations on adjoining land have the potential to impact directly on activities at the Dorket Head brick factory and the associated quarry land. Gedling Borough Council modified the proposed plan to take account of the concerns as set out in our July 2016 representation and those reiterated by the County Planning Authority (as Mineral Planning Authority).**
- 4. Gedling Borough Council proposed modifications to the plan as set out in the Tracked Changes Version of the Local Planning Document Publication Draft (Part 2 Local Plan) Version 2, December 2016. These modifications and the proposed mitigation proposed through prior extraction and phasing of development were material in the discussions throughout the Examination.**
- 5. The Revised Housing Background Paper, March 2017 Addendum includes a housing trajectory, specifically that regarding allocation H8, that does NOT accord to the Track Changed Version of the Local Plan.**

General commentary

Ibstock Brick Limited (Ibstock) is the owner and operator of Dorket Head Brickworks and Quarry. The allocations as proposed adjoin and are in proximity to the brickworks and quarry site.

The Dorket Head factory produces high-quality facing bricks for use in the construction industry. The factory provides long term stable direct employment for over 75 people – making them one of the major employers in the area. Indirect employment extends to many multiples of this number, using a stock of local trades and materials throughout the supply chain.

The combined output capacity of the factory is over 96 million bricks per year making Dorket Head one of the most important single factory suppliers in the UK and only one of two in the County. Manufacturing has been ongoing at the Dorket Head site since 1895.



Above and Below; Overview of the Dorket Head Factory in the foreground with and the quarry lands delineated blue with the closest allocations H8 (pink) and H7 (red) delineated for identification purposes.



Comments on revised housing background paper

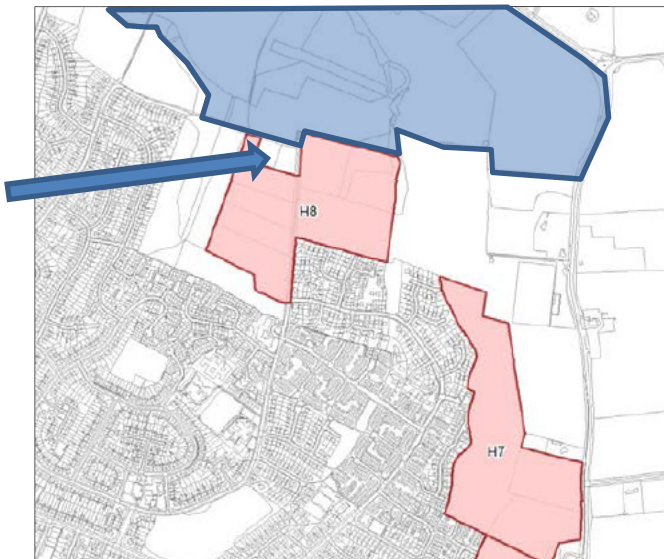
Our representations to date have highlighted the serious implications associated with the introduction of residential properties in close proximity to the quarry site. The approved quarry development took account of the presence of existing residential areas, notably Campbell Gardens and Strathmore Road, together with the development off Killisick.

The proposed modifications in the Track changed plan were proposed by Gedling Borough Council as a mechanism to mitigate concerns of both Ibstock and the County Council;

Referring to site H8;

*3.15 The site lies close to existing mineral and waste operations at Dorket Head. To protect both these operations and residential amenity **the phasing of the site should align with the expected extraction of minerals** and development should **maintain an appropriate standoff from active operations**. Other forms of mitigation, **such as bunds and screening**, may also be required. Prior extraction of brick clay from the site should be considered through the planning application. Consideration should be given to whether extraction is viable and feasible. Consultation with Nottinghamshire County Council as the Minerals and Waste Planning Authority will be required.*

(Tracked Changes Version of the Local Planning Document Publication Draft (Part 2 Local Plan)
Version 2, December 2016, Page 150)



Ibstock Brick have repeatedly refuted the compatibility of the proposed allocation H8 immediately adjacent to the southern boundary of the mineral 'Site'. The Mineral 'Site' as outlined indicatively in blue is recorded in the Minerals Local Plan as the preferred location for the supply of reserve to the Dorket Head Factory.

The modifications proposed in the tracked plan referred above go some way to mitigating the impact of housing development increasingly close to the permitted quarry site.

The sections of the text amplified in bold Red are important and were repeatedly referred to by Gedling in their responses to concerns raised by Ibstock throughout the EIP.

These sections are broken down further below;

1. **'the phasing of the site should align with the expected extraction of minerals'** -
The basis of this statement and discussions during the EIP indicated that the northern most extremity of the H8 plot would be phased to be completed towards the latter phases of working the existing planning permission in the Eastern Extension at or around 2026
2. **'maintain an appropriate standoff from active operations'** –
Indicating that some form of buffer would be retained alongside the northern most limit of H8 to buffer not ONLY from the existing consented areas but also from the 'Site' as defined in the Mineral Plan which immediately abuts the northern boundary of H8. The text continues by indicating that screening could include **'bunds'**

Based on the Revised Housing Background Paper (March 2017) the above statements and proposed amendments to the Tracked Changed Plan **cannot be achieved**.

Significant emphasis is placed in the Revised Background Paper regarding the contribution of the Urban Area in assisting the Borough in meeting the 5 year housing trajectory. Based on the revised figures presented in the plan, 5.13 years is reported as achieved. Housing site H8 features significantly in achieving this by;

- Increasing the total number of units on H8 from 215 to 230 units,
- Including in H8 additional land closest to the southern boundary of the Minerals Site as arrowed on the extract above,
- Commencing development of H8 in 2018/19
- Completing development of H8 by 2022/23

	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	TOTAL
H8 - Killisick Lane								20	60	60	60	30						230

(Extract from Appendix D of the Housing Trajectory March 2017 – Collapsed version ONLY showing H8)

The Eastern Extension area of the permitted quarry commenced in 2016 and is permitted to be worked for 20 years. The mineral life in the Eastern Extension is anticipated to last until 2026 based on current extraction rates. This is known by Gedling Borough Council as per the information from both Ibstock and the Mineral Planning Authority.

The proposed commencement of H8 in 2018 and full build out through to 2023 in no way meets the suggested phasing of development as per paragraph 3.15 above.

The inclusion of additional land on the southernmost boundary of the Mineral 'Site' as arrowed on the plan above has allowed an additional 15 units to be included in H8. This plot of land is clearly on the boundary of the two sites and thus does not accord to the 'maintenance of appropriate stand-off'.

Conclusions

Plot H8 is NOT Legally Compliant due to the sterilisation of minerals by proximal development on land immediately to the north of the plot. This area of mineral is the Gunthorpe Formation clay which has been commonplace at the Dorket Head factory since 1895 and represents some of the final reserves of Gunthorpe Clays remaining within the 'Site' as defined by the Mineral Planning Authority.

The Revised Housing Background Paper, March 2017 seeks to prove to the Inspector that a 5 year supply exists and indicates 5.13 years has been achieved. We would respectfully highlight that this has been achieved without regard to the proposed amendments offered by the District in the preparation of the plan as contained in the Track Changed version of the document which was core in the Examination process.

Ibstock maintain a position that IF plot H8 were delivered in the timescales as indicated, this will prejudice the existing permitted extraction at Dorket Head and will also sterilise the further reserves at the Site, which does not accord to National or County Planning Policy.


Simon C Ingram BSc (Hons) MRICS PIEMA
Ibstock Brick Limited, Planning and Estates Manager (UK South)

Ibstock Group Ltd. Simon Ingram, Dorket Head, Arnold, Nottingham, NG5 8PZ, United Kingdom
t: 01159 716805 m: 07831 524908 f: 01159 670121 e: s.ingram@ibstock.co.uk