

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

MATTER 10: EMPLOYMENT

Preamble

- 1. Ibstock Group Limited (Ibstock) is concerned that the draft Local Plan has not given due regard to the close proximity to its Dorket Head Brickworks of allocated sites together with the impact on an established employer associated with development in close proximity to the employment site and the quarry areas (quarry areas having already been covered under Matter 7 et al).**
- 2. The Inspector has asked a series of questions pertaining to employment provision in the Local Plan and the generality of this in relation to Dorket Head Brick factory has been submitted in our original proof of evidence dated July 2016. This paper will expand on the general content of that paper and address specifics in the questions including but not limited to;**

Q7. How much land will be lost from employment use as a result of allocations in the Plan? Is it anticipated that other employment land will be lost to other uses over the Plan period?

Q9. Does the protection of the existing employment areas accord with the strategy in the ACS?

Q12. Do Policies LPD 43 to LPD 47 make appropriate provisions for the retention, expansion and development of a range of different types of employment sites and uses within the Borough in accordance with national policy?

- 3. It is clear that the proposed allocations on adjoining land have the potential to impact directly on the employment at the Dorket Head brick factory. Site H5 and the inferred additional extension thereof in a northerly direction would brick housing in very close proximity to the operational brick factory. Indirectly to the Brick Factory allocation H8 the proximity of the allocation would affect land within the mineral site (the extent of which is defined on Inset Map 20 within the submission draft of the Nottinghamshire Minerals Local Plan, MLP); restricting permitted reserves and also possible future extensions (be they lateral or vertical).**
- 4. Representations were made by Ibstock on 4 July 2016 (Comment ID lpd_pub_b/269)¹. The document identifies the relationship between the Dorket Head Brick factory, quarry and the proposed allocation sites.**

¹ Representation in relation to the Gedling Borough Council Local Plan Allocations (Publications Draft, May 2016) Simon Ingram Planning & Estates Manager (South), Ibstock Brick, 4th July 2016

General commentary

5. 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.
6. 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.
7. 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. Continuous investment and development in the site since that time has seen the reconstruction and reconfiguration of the site principally in 1963 and then in 1995, both of which included complete rebuilding of new and improved manufacturing facilities. In 1963 factory output was around 250,000 bricks per week and this is now 1.9 million bricks per week.
8. The development of the brick production process through investment and development has allowed the use of deeper mineral strata in the adjoining quarries. The production process operates over 7 days per week, 12 hours per day, producing wire cut bricks, mainly for use in the mass housing or developer market.



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.



Below; Dorket Head factory viewed from the north looking to south with a partial view of existing residential with proposed site H5 to the right of the image



Response to Question 7

9. We do not consider that Gedling Borough Council have given adequate consideration to the potential impact on the established Dorket Head Factory in the proposed allocations. The ramifications on loss of employment land brought about either due to the indirect allocations close to the quarry (and the loss of employment land in the mineral reserve) or directly in proximity to the brick factory have been omitted in the plan making process.

10. The Gedling Borough Plan makes direct reference to specific employers in the plan area and by reference to location, identifies important employment locations. No specific reference is made to the presence of one of the UKs largest brick factories, or the importance of protecting the future prosperity of the site.
11. The Dorket Head Factory development is controlled as a District matter with all relevant development consents being granted by Gedling Borough Council. The Council also control the Environmental Permit for the factory which exerts operational control on all aspects of the process.

Response to Questions 9 and 12

12. LPD 43 is reported as having been prepared in consideration to the ACS Policy 4. LPD 43 makes general reference to the expansion or development of employment sites and this policy is welcomed in relation to the continued investment and development in the Dorket Head site by Ibstock. In subsections (A) and (B) of the policy at (iii) reference is made to the relationship between proposed expansion and conversion of employment sites and the '*amenity of nearby residents and occupiers*'.
13. In preparation of the plan the Council have not however given due consideration to the presence and location of the Dorket Head Factory and quarry lands, and the need to provide a suitable 'buffer zone' to protect the amenity of residential properties. This would seem juxtapose to the position in LPD 43.

Conclusions

14. Despite the Dorket Head factory being controlled by Gedling Borough Council in all respects of Development and Operational Control, the Local Plan has failed to have regard to the presence of the existing long term operational site either in the future development and investment of the brick factory or the relationship between proposed future development and the brick factory / quarry land.



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