

Gedling Borough Council

Response to Matter 10

Employment

Issue 10a: Employment Provision and Distribution

Q1. Is the overall level of employment provision and its distribution in the Plan consistent with the ACS? [Policies LPD 64 and LPD 66]

- 10.1 ACS Policy 4 makes provision for:
- 4b)...a minimum requirement of 310,000 sq. m of new office with 23,000 sq. m. of this to be located in Gedling Borough;
 - 4d) ...joint working between the Councils to ensure that a sufficient supply of land for new and relocating industrial and warehouse uses is maintained in part 2 Local Plans to provide a range and choice of sites up to 2028.....As a minimum 37 ha will be identified with Gedling Borough's share of the distribution being 10 hectares.
 - 4e) promoting significant new economic development as part of sustainable urban extensions including Top Wighay Farm, Teal Close and Gedling Colliery/Chase Farm.
- 10.2 The employment land provisions in the ACS are based on employment forecasts that converts jobs to land and floorspace requirements. The ACS at paragraph 3.4.1 explains that over the ACS plan period to 2028, an increase of approximately 37,000 jobs is anticipated across Greater Nottingham based on the forecasts set out in the Nottingham City Region Employment Land Study 2007 (NCRELS) (LPD/EMP/05).
- 10.3 Around half of the forecast jobs growth (18,000) would be in the office sector and it is from this job forecast that the office floorspace figures were derived by using a job to floorspace multiplier to calculate floorspace requirements of 310,000 sq. m. for the three Councils.
- 10.4 For industrial and warehousing land, NCRELS forecasts a further decline in demand but recommends some land would need replacing and also that a margin or buffer of land should be added to ensure the market would function smoothly. The ACS provides for a minimum of 37 ha across the plan area with Gedling Borough's share being a minimum of 10 ha.
- 10.5 Since the adoption of the ACS, Nathaniel Lichfield and Partners (NLP) were commissioned to provide an updated employment land forecast

(**LPD/EMP/05**) which for Gedling Borough Council forecasts less office growth and forecasts a slower decline in manufacturing/warehousing jobs.

- 10.6 The NLP study led to a reassessment of the quantum of employment land and office floorspace and its distribution by the Greater Nottingham authorities, which is set out in **LPD/BACK/03** (Strategic Distribution of Employment Land Requirements Background Paper).
- 10.7 The targets set out in parts (b) and (d) of Policy 4 of the ACS (albeit subsequently revised) are not additional to the strategic allocations set out in part (e) of Policy 4 (see response to question 4 below). Due to the NLP work updating the employment forecasts, the amount of employment land and floorspace being planned for in the ACS Part 1 and the LPD Part 2 Local Planning Document is different to the provisions in the ACS (see response to question 2 for an explanation of the revised targets). The revised targets are:
- Broxtowe Borough - 15 ha of industrial/warehousing and 34,000 sq. m of office¹
 - Gedling Borough - 19 ha of industrial/warehousing and 10,000 sq. m of office²
 - Nottingham City - 25 ha of industrial/warehousing and 253,000 sq. m of office.³

Q2. What are the key employment land targets for the Borough?

- 10.8 The floorspace/land requirements were based on job forecasts set out in NCRELS. This work was produced in 2007 and is considered to be increasingly out of date. The Inspector's Report on the ACS (**LPD/BACK/03**) refers to providing a minimum of 309,800 sq. m of office floorspace and 37 ha of employment land across the three Council areas based on the NCRELS evidence. The Inspector also referred to weaknesses in the NCRELS job forecasts as they predated the economic downturn in 2008 although the Inspector commented that economic projections are notoriously difficult and at that time there was no credible alternative to the NCRELS figures. Although there remain economic uncertainties nationally, the economy has generally recovered and the Nottingham Core and Outer Housing Market Councils considered it was sensible to commission new job forecasts.
- 10.9 As stated in the response to question 1 above, new forecasts were commissioned as part of the Employment Land Forecasting Study undertaken by Nathaniel Lichfield and Partners (NLP) specifically to inform Local Plans in both the Nottingham Core and Nottingham Outer HMAs. This study provides a comprehensive review across several local authority areas using a consistent

¹ The Broxtowe Borough Council requirement is identical to the ACS.

² Gedling Borough Council has a reduction of 13,000 sq. m of office floorspace and an additional 9 ha of industrial and warehousing land.

³ Nottingham City Council office requirement is identical to the ACS but and an additional 13 ha of industrial and warehousing land.

methodology. The conclusions of the NLP work led the Greater Nottingham Councils to review the amount and distribution of employment land and the findings are set out in the Strategic Distribution of Employment Requirements Background Paper (**LPD/BACK/03**). The NLP work based on achieving the D2N2 LEP growth aspirations indicated that the overall level of office floorspace required across Greater Nottingham was similar to the ACS requirement. For industrial/warehousing land a modest increase was needed. There was also a need for a degree of redistribution of land and office floorspace requirements across individual councils

10.10 The targets are established in the ACS but the Councils have agreed to work towards the revised targets set out in **LPD/BACK/03** based on the NLP work which is considered more up to date and robust. The revised targets are consistent with delivering the economic objectives in the Aligned Core Strategies by providing for the knowledge based economy and office based jobs. For industrial and warehousing land a modest increase is planned bearing in mind the ACS requirements were based on minimum provision. Both office floorspace requirements and need for industrial/warehouse land reflect the aspirations in the D2N2 LEP Strategic Economic Plan. For Gedling Borough, the revised targets require 9 more hectares of industrial and warehousing land (19 ha) and a lower level of office provision (minus 13,500 sq. m) as the target is revised down to 10,000 sq. m

Q3. Are there sufficient employment sites available of the appropriate nature and in the right place to meet anticipated needs?

10.11 As explained above, the Council is working to the revised distribution of employment land requirements agreed between the Greater Nottingham Authorities in **LPD/BACK/03**.

10.12 The following table sets out the employment land provisions in the adopted ACS Part 1 Local Plan and also those allocations proposed in the Local Planning Document Part 2 Local Plan. It is therefore demonstrated that the revised requirement for Gedling Borough of 19 ha industrial and warehousing land and 10,000 sq. m of office floorspace is met

ACS/LPD Policy	Location	Ha	Comments
ACS 2.4 c)	Top Wighay Farm	8.5	Strategic allocation. The County Council's letter dated 6 th February 2017 (EX/50) indicates up to 10,000 sq. m of B1 and 24,000 sq. of B8. Note 10,000 sq. m of office is assumed to require 2.5 ha land @40% plot ratio.
ACS 2.4 d)	Teal Close	7	Strategic allocation. The site has planning permission for about 18,000 sq. m of B1, 2 and 8 uses (up to 4,500 sq. m of which may be B1a).

ACS 2.4 e)	Gedling Colliery/Chase Farm strategic location (see below)	see below	Strategic location. ACS Policy 4 e)
Sub total (ACS)		15.5	
LPD 64	Gedling Colliery proposed allocation	5	Employment allocation at Gedling Colliery/Chase Farm strategic location
LPD 66	Hillcrest Park proposed allocation	1	Employment allocation
Sub total (LPD)		6	
Local Plan Total		21.5	

10.13 The Employment Background and Site Selection Paper (**LPD/BACK/02**) sets out how existing and realistic alternative sites have been assessed as part of the site allocations process. The quality of sites has been considered taking into account the site assessment in NCRELS (**LPD/EMP/05**), the Gedling Growth Strategy (**LPD/EMP/02**) and local planning officer knowledge

10.14 Sufficient land is identified in the ACS and the LPD to meet the revised need of 19 hectares of industrial land. No specific allocations are proposed for office based employment as it is assumed that office space will be provided on the strategic sites at Top Wighay Farm and Teal Close. Assuming office occupies 40% plot ratio and is single storey, then 10,000 sq. m would require 2.5 ha of land. There is sufficient employment land to meet the revised requirements.

10.15 Employment land is allocated in the right places in line with the ACS named locations and settlement hierarchy, as follows:

- The Teal Close sustainable urban extension adjoins the Nottingham conurbation close to the existing industrial concentration of firms in Colwick;
 - The Top Wighay Farm sustainable urban extension is located adjacent to the sub regional centre of Hucknall;
 - The strategic location of Gedling Colliery/Chase Farm adjoins the Nottingham urban area;
 - The employment allocation in the key settlement of Calverton is located close to a large industrial estate;
- No employment allocations are proposed for the other key settlements of Bestwood and Ravenshead due to:
- Lack of suitable sites;
 - The lack of a significant local employment base; or
 - Lack of developer/market interest.

10.16 NLP identify some vacancies in a number of the industrial estates meaning 'second hand' space is also available. NLP note that the above average levels of vacant floorspace stock are probably due to large units coming to the market as opposed to a general letting problem. Vacancies exist at the large

existing estates at Colwick Industrial Estate and Victoria Park. Both the Council and Rose Regeneration (**LPD/EMP/02**) found some vacancies in the smaller industrial estates although, as a rule, occupancy levels have held up quite well in recent years, see the Employment Background Paper (**LPD/BACK/02**). Land is also available at Colwick Industrial Estate which has planning permission for B2 and B8, although technically this is not new employment land as it falls within the protected employment area.

Q4. Should the Plan allocate land for the provision of 23,000sqm of new office and research and development floorspace and a minimum of 10ha for new and relocating industrial and warehouse uses, in addition to the strategic employment allocations at Top Wighay Farm (8.5ha) and Teal Close (7ha) and the strategic location of Gedling Colliery/Chase Farm (at least 2ha)?

- 10.17 No, as set out in the Council's response to the Inspector's initial questions (**EX/08**), the employment land and office requirements in ACS Policy 4 b) and 4 d) are not additional to the employment land allocated on the strategic site sites at Top Wighay Farm, at Teal Close and the strategic location at Gedling Colliery/Chase Farm.
- 10.18 As stated above, ACS Policy 4 employment floorspace and land calculations are based on the job forecasts. In relation to the office floorspace target, paragraph 3.4.12 of the ACS 4 supporting text explains that many office jobs will be accommodated within existing buildings and current supply, including sites identified in ACS Policy 4 (our underlining). The sites listed in ACS Policy 4 within Gedling Borough include Top Wighay Farm, Teal Close and Gedling Colliery.
- 10.19 The Greater Nottingham Employment Background Paper (**LPD/BACK/04**) explains that the office floorspace for Gedling Borough was set at its estimated capacity (23,000 sq. m) taking into account 10,000 sq. m at Top Wighay Farm (see table E2 on page 24 and table E3 on page 25 of **LPD/BACK/04**).
- 10.20 Paragraph 3.4.15 of the ACS, refers to the NCRELS study (**LPD/EMP/05**) forecasting a decline in industrial and warehousing jobs and also highlights that there is an oversupply of sites for these traditional employment sectors. ACS paragraph 3.4.18 acknowledges that supply exceeds need but ACS Policy 4 seeks to maintain a reasonable supply and encourages allocating new land where this would be attractive to the market. Paragraph 3.4.19 of the ACS notes that NCRELS recommends that some employment sites should be considered for release and policy guidance on this issue is set out in ACS 4 h). Due to such a large potential oversupply of industrial land, ACS Policy d) seeks to ensure that a sufficient supply is maintained through the plan review process. Paragraph 121 of the Greater Nottingham Employment Background Paper (**LPD/EMP/04**) clarifies that ACS Policy 4 provides overall minimum targets for the Plan Area:

“In the context of an existing oversupply of industrial and warehousing land,

Policy 4 of the Core Strategies has been redrafted to include broad quantitative guidance on the minimum level of provision each council should retail [sic] when undertaking reviews, in order to make up for anticipated losses with the frictional margin (80.6 hectares), and ensure a ready supply of land.”

- 10.21 The supply is identified in Table B1 in **LPD/EMP/04** being 214.7 ha across the Plan Area and the figure for Gedling Borough is 27.1 ha. Table C in **LPD/EMP/04** provides a breakdown of this 27.1 ha and identifies land at the SUEs as counting towards this supply figure.
- 10.22 ACS Policy 2 sets out the locational growth strategy and needs to be read in conjunction with ACS Policy 4. ACS Policy 2 identifies the locations for SUEs which include new employment development. Appendix A sets out the amount of land for the various employment uses including 8.5 ha at Top Wighay Farm and 7 ha at Teal Close and at least 2 ha at Gedling Colliery Chase Farm⁴. Policy 4 e) also refers to these same SUEs in terms of providing for significant new economic development. It is worth emphasising that economic development is defined to encompass a wider range of employment uses than those falling within the B1, 2, and 8 of the Use Classes Order. The monitoring arrangements in the ACS include monitoring the development of 310,000 sq. m of office space.
- 10.23 As explained in question 2 and 3, the Councils have agreed to work to revised targets as set out in **LPD/BACK/03**. The Plan does not therefore assume that the 23,000 sq. m and 10 ha of employment land is additional to provision on the SUEs.

Q5. Does the Plan allocate sufficient land for the provision of 23,000sqm of new office and research and development floorspace? If not, why not?

- 10.24 No, the explanation is given in the response to question 2. The provision of 23,000 sq. m of office floorspace would be excessive in relation to the likely jobs demand set out in the NLP work, which indicates a minimum figure of 10,000 sq. m as being more realistic. Gedling Borough is not considered a prime office location but more of a secondary location for office jobs and tends to meet demand for cheaper industrial and commercial space. Top Wighay Farm is considered to be accessible to junction 26 of the M1 for office and distribution but for an appropriate level of floorspace and should not compete with the Rolls Royce Strategic Site adjoining Ashfield. The County Council has confirmed by letter (EX/50) that it is proposed to develop 10,000 sq. m of office space at Top Wighay Farm. The planning permission at Teal Close permits up to 4,500 sq. m of B1 (a) office.

Q6. Does the Plan allocate sufficient land for the provision of a minimum of 10ha for new and relocating industrial and warehouse uses be made? If not, why not?

⁴ Note Table C in LPD/BACK/03 estimates the employment land available at Top Wighay Farm as 9 ha. This has since been revised to 8.5 ha taking into account land required for access to the site.

10.25 Yes, around 21.5 hectares of employment land is available. Once an allowance is made for office floorspace to be accommodated on these sites there would be around 19 hectares available for industrial/warehousing uses, which is above the minimum target of 10 ha in the ACS and sufficient to meet the revised needs for industrial/warehousing land of 19 ha set out in **LPD/BACK/03**.

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?

10.26 The Rolleston Drive housing allocation (H1) would result in the loss of approximately 5 hectares of employment use, although this formerly comprised a County Council owned depot and its loss would not result in the loss of any existing employment. NCRELS (**LPD/EMP/05**) recommended that a wider site should be considered for release. The Council reassessed the site and came to the view that the Rolleston Drive part of the site could be released for other uses but the Brookfield Road portion, which accommodates the Arnold Business Centre, should be retained (see Employment Background Paper **LPD/EMP/02**).

10.27 The NLP jobs forecasts which form the basis of the revised floorspace needs are net, that is they take account of predicted job gains and losses. NLP have also taken into account likely future losses of employment land including Rolleston Drive and factored in the need to replace some of these losses with new employment floorspace (see **LPD/EMP/03**).

Q8. How much of the land allocated for employment uses has already been built out? What are the implications of this going forward?

10.28 Hillcrest Park was allocated for mixed use in the adopted Replacement Local Plan and 1.9 ha has been completed for light industrial units with one hectare remaining (this site is carried forward into the Local Planning Document). At Gedling Colliery 1 ha of the site has been taken up by Alkane Energy (methane gas recovery). Available land on the strategic and non strategic allocations are as follows:

- Top Wighay farm is covered by the Supplementary Planning Document adopted in February 2017 (8.5 ha);
- Teal Close has planning permission for around 18,000 sq. m of B1, 2 and 8 employment uses;
- Around 5 hectares of land at Gedling Colliery remain available. The site will benefit from improved accessibility via the new GAR; and
- 1 ha at Hillcrest Park.

10.29 Sufficient land is available in good business locations to meet the 19 hectares of industrial/warehousing land and 10,000 sq. m of office as set out in **LPD/BACK/03**. Non B Class uses may also be accommodated on these sites, subject to them being compatible with the main employment use.

Issue 10b: Protected Employment Areas

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

- 10.30 Yes, the bulk of the protected sites relate to major existing employment sites within the main built up area of Nottingham in accordance with ACS Policy 4 h (i) and h (ii). The Colwick Industrial Estate is one of the largest employment sites in Greater Nottingham and is well located to provide business premises to support firms in Nottingham City as well as Gedling Borough. This site, Victoria Park and Teal Close are located close to dense urban populations including some in need of regeneration.
- 10.31 Other smaller sites within the urban area namely: Brookfields Road, Catton Road, Portland Street, Salop Street, Sherbrook Road and Station Road are also protected providing important local employment opportunities close to the main residential areas. The Employment Background Paper (**LPD/BACK/02**) notes that vacancy levels on these smaller sites are generally low. The Rose Regeneration report (**LPD/EMP/01**) is very positive about the provision of private sector small workshop space provided on some of the sites in the Arnold Area (Brookfields and Sherbrook Road). Other protected sites are located in the Key Settlement of Calverton and at the village of Newstead both of which are well established industrial estates.
- 10.32 The protected sites relate to the more significant employment areas but other individual and small estates also exist.

Q10. How much employment land is protected in the Plan? Is this appropriate?

- 10.33 Approximately 149 hectares of employment land is protected in the Plan, of which about 115 ha is considered average quality and 33 hectares above average (see Employment Background Paper **LPD/BACK/02**). This quantum of protected employment land is concentrated in the two existing sites at Victoria Park and Colwick Industrial Estate which are of strategic significance. Colwick Industrial Estate is well managed and caters for a wide variety of uses and well placed for relocating firms from Nottingham City. Victoria Park is of a high quality. This is not the totality of employment sites and premises in the Borough as numerous small individual sites and premises exist but are too small to be identified. However, Policy LPD 43 does not provide for the blanket protection of employment sites but includes criteria which, if satisfied, allows for their potential release for other uses.
- 10.34 No objections were received to the safeguarding of employment sites and none are being actively promoted for housing.

Q11. Are there any protected employment areas in the Borough that have not yet been developed?

10.35 The adopted Replacement Local Plan 2005 allocated land for a mixed use development at Hillcrest Park including 3 hectares for employment uses. About two hectares of this allocation has been developed and the remaining 1 hectare is allocated in the Local Planning Document.

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?

10.36 Yes, Policy LPD 43 (Retention of Employment and Employment Uses) is particularly important as it recognises the need for flexibility in accommodating other types of employment other than B1 to B8 jobs on traditional employment sites. Paragraph 12.2.2 of the supporting text gives a list of uses that are likely to be acceptable, although it is not exhaustive.

10.37 Policy LPD 43 does not provide for blanket protection but allows for the consideration of the change of use or redevelopment of existing employment sites subject to certain criteria being met.

10.38 Policy LPD 44 (Employment Development on Unallocated Sites) is intended to provide for unforeseen demand for employment uses that can be accommodated in an area, so long as they are compatible with surrounding land uses. Many modern businesses in use class B1 (a) can be located within residential areas.

10.39 Policy LPD 45 (Expansion of Existing Employment Uses Not in the Green Belt) allows for the expansion of existing employment uses where land is available.

10.40 Policy LPD 46 (Agricultural and Rural Diversification) deals with rural diversification. The GBC rural area is predominantly Green Belt and so is subject to Green Belt policy.

10.41 Policy LPD 47 (Local labour Agreements) commits the Council to work with developers in securing Local Labour Agreements. In practice the Council has also granted planning permission subject to a condition requiring a local labour arrangement. A minor change is proposed to paragraph 12.6.2 to recognise this practice.

Conclusion

10.42 The ACS targets in ACS 4 b) and d) have been revised jointly by the Greater Nottingham councils. However, they are not significantly different as the office floorspace requirement across Greater Nottingham is broadly the same as required by the ACS but requires an adjustment to the distribution between Councils. A modest uplift in industrial /warehousing land is required above the minimum levels set out in the ACS. The revised provisions are

considered consistent with achieving the economic objectives set by the ACS and also the economic aspirations of the D2N2 LEP.

10.43 The ACS and LPD make sufficient employment land and floorspace provision to meet the revised targets. The strategic allocations are not in addition to the ACS Policy 4 b) and d) targets for the following reasons:

- The job forecasts have been used to derive the overall land and floorspace quantities set out in ACS Policy 4 b) and d);
- The distribution of office floorspace as set out in ACS 4 b) took into account the capacity of Gedling Borough to accommodate office floorspace (set at 23,500 sq. m.) with the assumption that 10,000 sq. m of this capacity would be accommodated at Top Wighay Farm.;
- The ACS explains that the supply of industrial and warehousing land exceeds the minimum requirement in ACS Policy d);
- The ACS allocates strategic sites some of which are to include significant amounts of economic development Appendix A identifies the quantum of employment land for the two allocated SUEs amounts to 17.5 ha; and
- These strategic sites form part of the identified employment land supply in the Greater Nottingham Employment Land Background Paper (**LPD/EMP/04**);

10.44 The overall targets for both land and floorspace are net as they have taken into account likely losses of employment land whilst allowing for some new replacement floorspace. Important existing employment areas are protected but there is not a blanket restriction as sites can be released for other uses if policy based criteria are satisfied.

10.45 Policies are in place that allow non B class uses on employment sites subject to them being suitable and other policies allow for business on unallocated sites within settlements and are also generally permissive towards the expansion of the business in situ.

Further Proposed Changes

10.46 It is proposed to change paragraph 12.1.2 to make it clear in the introduction that:

- the LPD is working to revised employment land and floorspace targets set out in the Strategic Distribution of Employment Land Requirements (**LPD/BACK/03**);
- that the SUEs are not additional to the overriding provisions in ACS 4 b) and d);

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- the allocations in both the ACS including Top Wighay Farm (8.5 ha) and Teal Close (7 ha) together with the allocations in the LPD meet the revised targets; and
- no specific allocations are made for office development as these are assumed to be accommodated on the SUEs and in Arnold Town Centre.