

Report of the Chief Executive

APPLICATION NUMBER:	24/00687/REG3
LOCATION:	Land Off Shilo Way, Awsworth, Nottinghamshire
PROPOSAL:	Construct 2 buildings (5 units) Use Class E(g)(iii) employment starter units

This application has been brought before Committee because the Council is the applicant. The proposal is also a departure from the Broxtowe Part 2 Local Plan 2019.

1. Purpose of the Report

1.1 The application seeks full planning permission to construct two light industrial buildings comprising of five employment starter units with associated infrastructure.

2. Recommendation

The Committee is asked to RESOLVE that planning permission be granted subject to conditions outlined in the appendix.

3. Detail

3.1 The application seeks full planning permission for the development as outlined in paragraph 1 above.

3.2 Broxtowe Borough Council applied for and was successful in being awarded £16.5 million in January 2023 for government funding for a project called “Kimberley Means Business.” Part of the bid is based on the need to deliver new business premises to increase opportunities in response to local levels of socio-economic deprivation. As it is understood that the Levelling Up Funding (LUF) must be contractually committed before 31 March 2025 and substantially developed by 31 March 2026, there is a significant risk that it will be lost.

3.3 The application site is situated on land between the site of the former Bennerley Ironworks / Colliery and Shilo Way / A6096. The site is located within the Nottingham-Derby Green Belt. To the south-west of the site is grade II* Listed Building Bennerley Viaduct. Planning permission and Listed Building Consent were recently granted for a visitor centre, ramp and parking. To the east, at a higher land level, is Naptha Boarding Kennels. Surrounding land in this location predominantly consists of open grasslands and woodland.

3.4 The main issues relate to whether the principle of the development in the Green Belt is acceptable; the impact on the openness of the Green Belt; the impact on the character of the site and the wider landscape; the impact on heritage assets; the impact on the living conditions of neighbouring properties; the impact on highway safety; the impact on ecology and Biodiversity Net Gain (BNG); the impact on land stability and contamination and the impact on drainage.

- 3.5 What is proposed is considered to be inappropriate development in the Green Belt. The main issue to assess is whether any of the matters within the report contained within the **Appendix**, taken individually or collectively, amount to the Very Special Circumstances (VSC) necessary to outweigh the harm to the Green Belt through inappropriateness. What constitutes VSC will depend on the weight of each of the factors put forward and the degree of weight to be accorded to each is a matter for the decision taker. Firstly, it is to determine whether any individual factor taken by itself outweighs the harm. Secondly, to consider whether a number of factors combine to create VSC.
- 3.6 Substantial weight is afforded to the time limited opportunity of the proposal to ensure the LUF is contractually committed by 31 March 2025 and that national government funding (£4m - £5.5m) is not lost in the interests of generating employment. Weight is afforded to the opportunity for the proposal to meet an identified local employment need and to the construction and operational economic benefits associated with the proposal. Weight is also afforded to the attempts to find alternative sites. Collectively, this is given significant weight.
- 3.7 It is considered that the above factors taken collectively do amount to the VSC and are sufficient to clearly outweigh the harm by reason of inappropriateness, the harm to the openness of the Green Belt and the harm to the character and appearance of the area.

4. Financial Implications

- 4.1 The comments from the Head of Finance Services were as follows:

There are no additional financial implications for the Council with the costs/income being within the normal course of business and contained within existing budgets. Any separate financial issues associated with S106s (or similar legal documents) are covered elsewhere in the report.

5. Legal Implications

- 5.1 The comments from the Head of Legal Services were as follows: The Legal implications are set out in the report where relevant, a Legal advisor will also be present at the meeting should legal considerations arise.

6 Data Protection Compliance Implications

- 6.1 Due consideration has been given to keeping the planning process as transparent as possible, whilst ensuring that data protection legislation is complied with.

7. Background Papers

- 7.1 Nil.

Appendix**1. Details of Application**

- 1.1 Broxtowe Borough Council applied for and was successful in being awarded £16.5 million in January 2023 for government funding for a project called “Kimberley Means Business.” The key rationale for the project was to replace jobs and opportunities that had been lost in that community over several years.
- 1.2 Part of the bid is based on the need to deliver new business premises to replace those sites lost to housing development, and it is proposed to redirect some of LUF resources to deliver the proposed development. It is understood that the LUF funding must be contractually committed before 31st March 2025 and substantially developed by 31st March 2026, there is a significant risk that it will be lost and that the opportunity to safeguard and generate jobs and secure associated economic benefits will have been missed.
- 1.3 The application seeks approval for 2 light industrial buildings comprising of 5 employment starter units including car parking areas, service yard, cycle storage and associated soft landscaping. The proposal will create a total of 1,270.5 square metres of light industrial floor space. The site area is 2.42 acres (0.98 hectares).
- 1.4 The units are proposed to share a central service yard and will have a total of 48 car parking spaces. This includes 3 accessible parking spaces and 6 EV charging spaces. In addition to this, 10 secure cycle spaces under a cycle shelter would be provided. Refuse accommodation is proposed to be in the shared yard and a single storey substation located south of unit 1.
- 1.5 The proposed access includes an extension of the existing private road that leads off Shilo Way. The scheme includes works to the access to improve vehicle and pedestrian safety. The proposed building would be sited up to the north-western boundary that comprises of a strip of woodland that runs north to south. Parking and turning areas would be provided to the east of the proposed units. The layout also includes soft landscaping planting including trees throughout the site including a wetland meadow in the south-western corner of the employment site.
- 1.6 The application site boundary was amended to include 3 parcels of land (amended plans received 10/01/24). Neighbouring properties were consulted including a press notice and site notice undertaken for 21 days. The amended red line plan was submitted to demonstrate additional land for the application to achieve 10% biodiversity net gain. During the course of the re-consultation period the red line plan has been further amended to remove land south-west and south of the employment site, this is to assist 10% biodiversity net gain.

2 Location and Site Characteristics

- 2.1 The application site is situated on land between the site of the former Bennerley Ironworks / Colliery and Shilo Way / A6096. The site is located within the Nottingham-Derby Green Belt.

- 2.2** To the south-west of the employment site is grade II* Listed Building Bennerley Viaduct. Planning permission and Listed Building Consent were recently granted for a visitor centre, ramp and parking. The site has been excavated to support the adjacent Bennerley Viaduct visitor centre development. Prior to this, the site had been undeveloped historically. A band of trees runs across the western, northern and eastern boundaries with access to the adjacent development on the southern boundary. The topography is relatively uneven, with levels rising from the centre of site to the site access in the south eastern corner.
- 2.3** To the east, at a higher land level, is Naptha Boarding Kennels. Surrounding land in this location predominantly consists of open grasslands and woodland.

3 Relevant Planning History

3.1

Planning		
74/00059/FUL	Vehicle storage	PERU
76/00633/FUL	NEW BY-PASS ROAD TO THE WEST OF AWSWORTH FROM GILTBROOK TO THE ILKESTON JUNCTION	PERU
84/00465/FUL	CONSTRUCT NEW ROAD WITH ASSOCIATED WORKS	PERC
85/00453/CCM	EXTRACT COAL BY OPENCAST METHODS	PERC
86/00560/CCM	EXTRACT COAL BY OPENCAST METHODS (8.1 HA.)	PERC
88/00172/CCM	FORM EXTENSION TO EXISTING OPENCAST COAL MINING SITE	PERC
90/00033/CCM	EXTEND OPENCAST COAL SITE AND ENHANCED RESTORATION	PERC

91/00113/CCM	VARIATION OF CONDITION NO. 3 ON PREVIOUS PLANNING PERMISSION REF. 5/09/90/0033/-	PERCN
91/00468/CCR	CONSTRUCT NEW ROAD WITH ASSOCIATED WORKS	PERU
92/00704/CCR	CONSTRUCT NEW HIGHWAY WITH ASSOCIATED WORKS	PERC
93/00410/CCM	VARIATION OF CONDITION TO EXTEND PERIOD ALLOWED FOR TIPPING AND RESTORATION TO 31 AUGUST 1995	PERC
23/00527/FUL	Construction of a cycle and pedestrian embankment to the Bennerley Viaduct, Visitor Centre, Car Park, Access and associated infrastructure	PERC

4 Planning Policy

Part 1 Broxtowe Aligned Core Strategy 2014:

- Policy 1: Climate Change
- Policy 2: The Spatial Strategy
- Policy 3: The Green Belt
- Policy 4: Employment Provision and Economic Development
- Policy 10: Design and Enhancing Local Identity
- Policy 11: The Historic Environment
- Policy 14: Managing Travel Demand
- Policy 15: Transport Infrastructure Priorities
- Policy 16: Green Infrastructure, Parks and Open Space
- Policy 17: Biodiversity

- Policy 18: Infrastructure
- Policy 19: Developer Contributions

Part 2 Local Plan 2019:

- Policy 8: Development in the Green Belt
- Policy 17: Place-making, design and amenity
- Policy 19: Pollution, Hazardous Substances and Ground Conditions
- Policy 20: Air Quality
- Policy 21: Unstable Land
- Policy 23: Proposals affecting Designated and Non-Designated Heritage Assets
- Policy 26: Travel Plans
- Policy 28: Green Infrastructure Assets
- Policy 30: Landscape
- Policy 31: Biodiversity Assets
- Policy 32: Developer Contributions

Awsworth Neighbourhood Plan 2021:

- BED 1 Awsworth Character Buildings & Structures of Local Heritage Interest
- BED 2 Local Areas of Special Character
- BED 3 Design Principles
- GI 1 Green & Blue Infrastructure Network
- GI 2 Local Landscape Character Areas
- GI 3 Biodiversity
- GI 4 Designated Local Green Spaces
- GI 5 Local Woodlands, Tree Belts & Hedgerows
- E 2 Encouraging Small Businesses
- TT 1 Traffic Management
- TT 2 Car Parking
- TT 3 Sustainable Transport
- BV 1 Bennerley Viaduct
- BV 2 Bennerley Viaduct Visual Setting
- NC 1 Nottingham Canal
- BCDP 1 Former Bennerley Coal Disposal Point Land
- DC 1 Developer Contributions from New Development in Awsworth

National Planning Policy Framework 2024:

- Part 2 - Achieving sustainable development
- Part 6 - Building a strong, competitive economy
- Part 9 – Promoting sustainable transport
- Part 12 – Achieving well designed places
- Part 13 - Protecting Green Belt land
- Part 15 - Conserving and enhancing the natural environment
- Part 16 – Conserving and enhancing the historic environment

5 Consultee and Third Party Comments

5.1 Consultees

- **Broxtowe Tree Officer** – No objections.
- **Broxtowe Parks and Open Spaces** – Biodiversity measures recommended including tree planting, habitat piles, reptile hibernaculum, bird and bat boxes.
- **Broxtowe Environmental Health** – No objections subject to conditions relating to operational and construction noise mitigation measures.
- **Broxtowe Contamination Officer** – No objections. The Council's Contamination Officer has reviewed the Phase 2 Geo-Environmental Assessment Report (December 2024) and no concerns have been provided with due regard for any potential ground, water or gas contamination risk caused by the proposed development. A condition has been recommended to cover the discovery of unexpected land contamination in the made ground during any development.
- **Broxtowe Waste** – Businesses using units must ensure they obtain a trade waste company to remove their waste. The application site should include suitably sized bin storage areas and kept tidy.
- **Broxtowe Conservation Officer** – No objections.
- **Broxtowe Planning Policy** – Observations provided:
 - The application for the employment starter units is located within the proposed allocation under Policy 22 of the Greater Nottingham Strategic Plan (GNSP). The GNSP is at Regulation 19 stage. Whilst only limited weight can be applied to the GNSP, the proposed allocation is critical for meeting unmet logistics need across the Greater Nottingham area and therefore it is important that the application for the employment starter units does not prejudice the delivery of the logistics development.
 - It is considered that the proposed units would not be 'logistics' and would not accord with the minimum unit size requirements stated within the

policy. However, an element of 'ancillary' uses may be accepted which help to support the wider logistics use.

- The site is within the Green Belt and the development would be considered to be inappropriate development within the Green Belt.

- Reference is made within the application to VSC existing due to the need to use LUF money, which would be lost, to deliver start-up employment units. Reference is also made to meeting the Council's employment need. Both the Publication Draft: Employment Background Paper September 2024 and Nottingham Core HMA and Nottingham Outer HMA Employment Land Needs Study 2021 are material considerations when assessing the need for more employment units.

- **NCC Planning Policy** – No concerns raised with regards to mineral safeguarding, existing waste management facilities and transport and travel services.
- **NCC Highways** – No objections subject to conditioning the parking / turning areas are surfaced in a bound material and that the proposed highways works are completed to the satisfactory for the Local Planning Authority.
- **NCC Rights of Way** – No objections. Stapleford Footpath 14 runs adjacent to the application site. The public footpath appears to be unaffected by the proposal.
- **NCC LLFA** – No objections subject to conditioning a detailed surface water strategy to be submitted.
- **Coal Authority** – No objections, informative note advised. The application site falls within the Coal Authority's defined Development High Risk Area. The Coal Authority considers that the content and conclusions of Coal Mining Risk Assessment Report (HSP2024-C4713-G-CMRA-2509 Rev B, December 2024) are sufficient in demonstrating that the application site is safe and stable for the proposed development.
- **Severn Trent Water** – No comments received.
- **Nottinghamshire Wildlife Trust** – No comments received.
- **National Highways** – No objections.
- **Historic England** – No comments to make on this application.

- **Awsorth Parish Council** – The following observations were made:
 - The application site was not used as an operational part of the former coal disposal point to the west. It formed an area of meadowland.
 - Concerns raised in relation to the impact on ecology and biodiversity. All precautionary working measures and enhancements referenced in the supporting Ecological Appraisal should be conditioned.
 - Off-site biodiversity net gain using land in Awsorth Parish would be supported.
 - Concerns have been raised with regards to highway safety measures to protect all users of the highway and nearby network of footpaths. Road marking should be incorporated into the hard landscaping scheme where the Erewash Valley Trail will cross the extended access road. A pedestrian crossing with dropped kerbs should be installed where Footpath 10 / Bridleway 17 cross the new road.
 - Concerns have been raised in relation to the proposed car parking and access road being used by general visitors of the local footpath network and Bennerley Viaduct. Parking spaces should be regulated and security measures should be installed to avoid misuse of the business use parking. However, sharing of parking spaces during organised events at the Bennerley Viaduct would be welcomed.

5.2 Resident comments - 1 comment was received raising the following concerns:

- Parking on the extended access road. On street parking deterrents should be implemented i.e. double yellow lines.

6 Assessment

6.1 The main issues to take into account when assessing this application are:

- Green Belt – Principle
- Green Belt – Openness
- Local Character and Landscape Impact
- Heritage
- Living Conditions
- Access and Safety
- Ecology, Biodiversity and Trees
- Contamination and Land Stability
- Drainage
- Sustainability

6.2 Green Belt – Principle

6.3 Policy 8 – Development in Green Belt of the Part 2 Local Plan states that applications for development in the Green Belt will be determined in accordance with the NPPF, as supplemented by the following Broxtowe specific points 1-4.

- 6.4** Paragraph 142 of the NPPF explains that the government attach great importance to Green Belts. The fundamental aim is to prevent urban sprawl by keeping land permanently open. Their essential characteristics are their openness and their permanence. One of their five main purposes is to assist in safeguarding the countryside from encroachment
- 6.5** Paragraph 153 of the NPPF advises that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Paragraph 153 states that substantial weight should be given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.
- 6.6** Paragraph 154 of the NPPF indicates that a Local Planning Authority should regard the construction of new buildings as inappropriate in the Green Belt and sets out a number of limited exceptions which can be regarded as appropriate development. Paragraph 155 lists circumstances where the development of homes, commercial and other development in the Green Belt should also not be regarded as inappropriate.
- 6.7** This proposal does not fall within any of the exceptions referred to in paragraphs 154 and 155 of the NPPF. The development would therefore be inappropriate development and is therefore harmful, by definition, to the Green Belt.
- 6.8** This proposal is unacceptable in principle in the Green Belt since it does not meet any of the exceptions of appropriate development set out in the NPPF. The proposal should therefore be refused unless the harm by definition and any other harm arising from the impacts of the development are clearly outweighed by other considerations. These must, either collectively or individually, amount to the VSCs necessary to outweigh the harm and justify the development. The final section of this report makes this assessment.
- 6.9** Green Belt – Openness
- 6.10** The essential characteristics of the Green Belt are its openness (lack of development) and permanence (enduring in the long term). Paragraph 142 of the NPPF advises the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open.
- 6.11** The National Planning Practice Guidance (PPG) advises that assessments on the openness of Green Belts requires consideration of matters such as, but not limited to:
- openness is capable of having both spatial and visual aspects – in other words, the visual impact of the proposal may be relevant, as could its volume;
 - the duration of the development, and its remediability – taking into account any provisions to return land to its original state or to an equivalent (or improved) state of openness; and

- the degree of activity likely to be generated, such as traffic generation.

- 6.12** The application site includes 2 parcels of land; the main area for the proposed development and an additional parcel of land to the east (other side of Shilo Way); additional land needed is for biodiversity enhancement purposes only. The proposal includes two industrial buildings positioned along the western boundary set side by side. Unit 1 is approximately 8.8m and unit 2 is 7.4m in ridgeline height. Unit 1 is approximately 44m in length and 19m in width including a Gross Internal Area (GIA) of 766m². Unit 2 is approximately 38m in length and 15m in width including a GIA of 516m². As such, it is considered that the proposed buildings are significant in footprint and scale. A single storey substation also is proposed, located south of the proposed industrial buildings.
- 6.13** The industrial buildings would be set back from the highway located within an enclosed area partly screened by trees and an embankment located on the western and eastern boundaries of the site. As a result of the lower finished floor levels and woodland screening surrounding the site, it is considered inter-visibility of the proposed buildings from main public view points including Shilo Way, to the east, and views from the Bennerley Viaduct, to the south west, would be reduced. However, the effects on openness are not purely created by built form.
- 6.14** Notwithstanding this, there are concerns regarding the spatial impact on the openness in this area of the Green Belt. The site would change from open undeveloped grassland area to an employment site containing two large buildings and associated infrastructure and hard standing. The development would harm the visual and spatial aspect of openness through the introduction of industrial buildings and associated infrastructure.
- 6.15** Whilst parts of the employment site courtyard would remain free from buildings comprising of only parking, bin / cycle storage and vehicular access, there would be a high level of activity during the construction period and during the operation of the site. As such, the impact on the openness in terms of activity generated would be significant once the site is operational. The proposed development as a result would result in a permanent loss of openness in this location.
- 6.16** The Greater Nottingham Strategic Plan Green Belt Review Appendix C document provides an up to date review of Green Belt land in Broxtowe. The proposed development is located in Area 2: West of Awsworth. The broad area includes Green Belt land which separates nearby settlements of Awsworth to the east and Ilkeston to the west. Area 2 makes a significant contribution in fulfilling key aims of the Green Belt in checking the unrestricted sprawl of settlements and preventing neighbouring settlements from merging into one another. Land east of the bypass has been removed from the Green Belt and allocated for residential development by Policy 4.1 of the Broxtowe Part 2 Local Plan. The bypass acts as a strong defensible boundary to the west of the village, however there is now no land to the east of the bypass that could be suitable for development. As such, when assessing the harm to the openness within the wider Green Belt, it is considered the proposed development would lead to a material encroachment into the Green Belt beyond Shilo Way.

- 6.17** It is concluded that in addition to the harm by reason of inappropriateness, the proposed development would lead to a reduction in the openness. Though in part mitigated by site location and levels, due to the scale and extent of the proposal and the solid filling of the site, the development would reduce the openness of the Green Belt both spatially and visually.
- 6.18** The development would therefore fail to preserve the openness of the Green Belt both spatially and visually and would be contrary to Policy 8 of the Part 2 Local Plan and the NPPF. The degree of harm will be discussed in more detail in the final section of this appraisal.
- 6.19** Local Character and Landscape Impact
- 6.20** The proposed development is located within local character area (LCA) Erewash River Corridor and Babbington Rolling Farmlands part of the Greater Nottingham Landscape Character Assessment (GNLCA) which is protected under Policy 30 – Landscape of the Part 2 Local Plan. Policy 16 – Green Infrastructure, Parks and Open Space of the Part 1 Local Plan advises that the approach will require that:
e) Landscape character is protected, conserved or enhanced where appropriate in line with the recommendations of the Greater Nottingham Landscape Character Assessment (GNLCA).
- 6.21** Relevant policies in respect of the design and impacts on the character of the area include Policy 17 – Place-making, Design and Amenity of the Part 2 Local Plan. Policy 30 – Landscape of the Part 2 Local Plan states all developments within, or affecting the setting of, local landscape character areas should make a positive contribution to the quality and local distinctiveness of the landscape. They should therefore be consistent with the ‘landscape actions’ for the area concerned, as set out in the GNLCA and in Appendix 7 the Part 2 Local Plan.
- 6.22** The site also falls within the Awsworth Neighbourhood Plan area which includes a number of relevant design and character related policies. Policies including BED 3 Design Principles and GI 2 Local Landscape Character Areas require any proposed development to preserve the local character areas in Awsworth Parish and help to enhance the locality. Further to this, Policy GI 5 Local Woodlands, Tree Belts & Hedgerows highlights the importance the natural environment contributes to the landscape character of the Parish. Development proposals that would result in the loss, damage or deterioration of these assets will not be supported unless the harm is outweighed by the benefits of the development and appropriate mitigation can be provided.
- 6.23** The site benefits from a strong degree of containment by existing tree cover in the immediate area and screening from surrounding rising land form. Beyond the immediate woodland areas surrounding the site, land to the north-west and south-west is characterised by flat floodplains and earthworks related to the historic former coal disposal point. Land beyond the viaduct is predominantly characterised by floodplain grasslands. To the east, land beyond Shilo Way includes housing allocation Policy 4.1 Land West of Awsworth of the Part 2 Local Plan, currently under construction, and further to the east includes the existing settlement of Awsworth.

- 6.24** Public views of the proposed development would be mostly screened from Shilo Way due to existing woodland and Naptha House kennels. Within the vicinity of the proposed buildings are a number of footpaths and bridleways. Awsworth BW17 runs adjacent to the north-east boundary of the employment site and Awsworth FP10 runs from the south along the Nottingham Canal and crosses the access of the application site leading to Shilo Way. To the south-west of the site is Bennerley Viaduct which provides extensive views of the local landscape to the north and south. Further to this, planning permission was granted for a pedestrian ramp to the viaduct and a visitor centre with associated car parking (23/00527/FUL). This project is currently under construction.
- 6.25** It is considered that the proposed development would be most sensitive to public views locally from AwsworthBW17 to the north-east, especially after the loss of some existing woodland along this boundary. It is also expected the proposed development would be highly visible for users of the viaduct pedestrian ramp which would provide views towards the development from a raised land level. Views from AwsworthFP10 to the south-east would be reduced by the separation distance of the crossing and the proposed development. When crossing the viaduct, as a result of the separation distance of the proposed development contained within woodland and varying land levels, it is considered the prominence of the proposed buildings within the wider landscape would be reduced.
- 6.26** The impact of any change to the landscape character would be localised as a result of the woodland containment and lowered finished floor levels of the site. New landscape planting on the adjacent embankments would offer enhancement to existing tree belts and provide screening and visual enclosure of the proposed development. Whilst any significant changes to the landscape when viewed from wider viewpoints may be lessened, the proposal would amount to significant localised harm to the character of the site which would be highly visible from several pedestrian walkways nearby and the Bennerley Viaduct visitor centre.
- 6.27** The proposal would represent wholesale redevelopment of the site and would urbanise the character of this section of the Green Belt. The proposal fails to demonstrate compliance with the landscape actions associated with the Erewash River Corridor LCA and Babbington Rolling Farmlands LCA. Whilst the site is a relatively smaller parcel of both of the wider local character areas, the proposal would not positively contribute to the wider floodplain and rural character in this location.
- 6.28** It is considered that the scheme would have a materially adverse impact on the character and appearance of the area due to the commercial nature and scale of the proposal. The degree of harm will be weighed up within the planning balance in more detail in the final section of this appraisal in regard to any benefits that may outweigh any harm with regards to relevant policies contained within the Broxtowe Part 1 Local Plan, Part 2 Local Plan and Awsworth Neighbourhood Plan.

- 6.29** Heritage
- 6.30** Policy 11 - The Historic Environment of the Aligned Core Strategy seeks to conserve and enhance the historic environment, including the heritage assets and their settings. Policy 23 - Proposals affecting Designated and Non-Designated Heritage Assets of the Part 2 Local Plan states proposals will be supported where heritage assets and their settings are conserved or enhanced in line with their significance.
- 6.31** Policy BED 1 Awsworth Character Buildings & Structures of Local Heritage Interest of the Awsworth Neighbourhood Plan advises that development proposals that harm the historic significance and/or setting of Awsworth Character Buildings and Structures of Local Heritage Interest will be assessed having regard to the scale of harm and the significance of the heritage asset. The Awsworth Neighbourhood Plan contains a list of local heritage assets which should be considered. Policy BED 2 Local Areas of Special Character advises that within the Awsworth Historic Core and Great Northern Line Local Areas of Special Character development proposals should be of high quality and must be designed to respect and enhance the specific characteristics of the Character Area. Support will be given for the enhancement of these special character areas. The vehicle access runs through Great Northern Line Local Area, however no built development would be sited in this special character area.
- 6.32** Policy BV 1 Bennerley Viaduct advises that development proposals that protect or enhance the structure and setting of Bennerley Viaduct will be supported. This policy supports projects on, under or adjacent to the viaduct that would enhance local connectivity and use of the viaduct. Policy BV 2 Bennerley Viaduct Visual Setting advises that any development proposals within the visual setting of Bennerley Viaduct must demonstrate how they seek to respect the open setting of the Grade II* Listed Building including in relation to location, orientation, scale, mass, height, materials, colour and landscaping.
- 6.33** To the south-west of the proposed industrial buildings approximately 150m away is Grade II* Listed Building Bennerley Viaduct. To the east of the site is Naptha House, a local heritage asset identified in the Awsworth Neighbourhood Plan. The application has been supported by a Heritage Statement. Consideration has been made as to whether the proposed development would cause harm to the heritage significance of the Bennerley Viaduct through changes in setting.
- 6.34** Due to the limited inter-visibility of the site partly screened by woodland and changes in topography, this helps to reduce potential views of the proposed development in the wider context of the Bennerley Viaduct. The Heritage Statement highlights that the application site is detached and is not considered to contribute to the significance of the asset through setting. Views taken from the viaduct of the proposed development would be limited as a result of the woodland screening of the site, despite the removal of part of the embankment to the south-west of the proposed buildings. Any glimpsed visibility would not distract from the appreciation and understanding of the viaduct, its historic function, its rarity or the elements of the architectural innovation which contribute to its Grade II* listing. The Heritage Statement advises that whilst the area to the south of the viaduct

had been historically undeveloped, industrial works were historically present to the north.

- 6.35** Advice from the Council's Conservation Officer highlights the public benefits associated with the 5 employment starter units being proposed which should carry weight in the overall assessment. There is an acknowledgement that the landscape as it currently stands is much changed from its former industrial setting. The Heritage Statement shows the myriad of industrial buildings, roads, rail infrastructure and heavy industry plant historically found in this locality. Whilst the industrial buildings are significant in scale, the once industrial setting of the wider area compounded by the separation distance from the viaduct and screening of the proposed development by woodland areas helps to reduce any adverse impact to the Grade II* viaduct. Further to this, the Council's Conservation Officer has advised that the mature planting between the site and the nearby Naptha House locally listed building helps to mitigate any significant impact to the special character of this building. Overall, the Council's Conservation Officer provides no objections to the proposed development.
- 6.36** As such, it is considered the proposed development would amount to limited harm to any heritage assets.
- 6.37** Living Conditions
- 6.38** Policy 10 - Design and Enhancing Local Identity of the Aligned Core Strategy requires that development is assessed in terms of its treatment of the impact on the amenity of nearby residents or occupiers. Policy 17 - Place-making, Design and Amenity of the Part 2 Local Plan states that permission will be granted to new development which ensures a satisfactory level of amenity for neighbouring properties. Policy BED 3: Design Principles of the Awsworth Neighbourhood Plan also requires the design not to significantly impact residential amenity. Policy 19 - Pollution, Hazardous Substances and Ground Conditions of the Part 2 Local Plan states that permission will not be granted for development that would result in an unacceptable level of pollution or contamination of groundwater resources. It also seeks to ensure that contaminated land is investigated and handled appropriately.
- 6.39** The nature of the proposal is such that it is likely to generate noise associated with the operation of the employment units and comings and goings linked with the site. A Noise Impact Assessment has been undertaken to determine the existing acoustic climate, predict the sound levels as a result of the development and assess the potential impact on nearby receptors. The closest sensitive receptor to the site is a residential property that is associated with a dogs boarding kennel, located to the east of the employment site. Further residential properties are located to the east beyond Shilo Way.
- 6.40** The proposed use, by definition, will include uses that can be carried out in a residential area without detriment to its amenity (Use Class E (g) (iii)). The noise assessment carried out has considered noise events within external yard areas based on noise levels which would be more akin to B8 (storage and distribution) or B2 (heavy industrial) uses. It is understood that the development would be served by vehicles smaller than a HGV which would have a lower level of noise

emission. However, as a robust approach for the purpose of this assessment, HGV movements along the site access have also been considered.

- 6.41** Based on the over-estimate of the likely noise generating activities, a low impact is predicted during both daytime and night-time periods. Environmental Health have reviewed the Noise Impact Assessment and have provided no objections to the development. Environmental Health have recommended conditions to help reduce noise associated with the operation of the units such as the restriction of activities outside the units that may lead to excessive noise pollution. Further to this, relevant conditions to reduce noise during the construction period including a construction method statement and limited construction hours have been recommended to be conditioned.
- 6.42** Having regard to the above and subject to the aforementioned condition, it is considered that the impact on residential amenity would be acceptable in accordance with policies contained within the Part 2 Local Plan and Awworth Neighbourhood Plan.
- 6.43** Access and Safety
- 6.44** Paragraph 109 of the NPPF encourages developers to consider the potential impacts of development on transport networks, and how these can be addressed, and opportunities to promote walking, cycling and public transport use. Paragraph 116 of the NPPF states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
- 6.45** Policy 17 - Place-making, Design and Amenity of the Part 2 Local Plan advises that for all new development, permission will be granted for development which; i) provides sufficient, well-integrated, parking and safe and convenient access. Policies TT 1 Traffic Management, TT 2 Car Parking, TT 3 Sustainable Transport of the Awworth Neighbourhood Plan advise that traffic management measures that improve highway, cyclist and pedestrian safety will be supported. Further this, proposals that demonstrate an appropriate amount of car parking and assist in the enhancement of walking networks in the locality will be supported.
- 6.46** Between the development site and the A6096 Shilo Way to the east, there is a short access road which currently provides access to the Naptha Boarding Kennels. The access road extends from Shilo Way for a distance of 30m before transitioning to a gravel footpath which continues west and separates the southern boundary of the site and the northern boundary of the consented visitor centre.
- 6.47** Planning permission was granted for residential development to the east of the A6096 Shilo Way (20/00056/OUT) for up to 250 dwellings. The consented residential development will be accessed from a new traffic signal-controlled T-junction on the A6096 Shilo Way, located approximately 65m south of the above-described Naptha Kennels access road. Toucan crossings will be provided on the A6096 Shilo Way. The consented junction works also include for the provision of a 3m wide footway/cycleway on the western side of the A6096 Shilo Way which will continue west along the southern side of the Naptha Kennels access road, towards

the consented Bennerley Viaduct visitor centre and the proposed development.

- 6.48** There are a series of footpaths and bridleways in the vicinity of the site which are part of the Nottingham Canal trail. A Bridleway runs parallel to the eastern boundary of the employment site before branching off into the Nottingham Canal trail and routing southwards over the Erewash Valley Main Line and along the Erewash Canal, towards Cotmanhay and Ilkeston.
- 6.49** Regarding bus travel, the nearest bus stops to the site are on Gin Close Way (adjacent and opposite Main Street) and are within 850m walking distance from the proposed development. The bus stops serve the 27 route which runs from Kimberley to Ilkeston on an hourly basis.
- 6.50** The development would be accessed via a priority controlled T-junction from an extension of the existing access road to the Naptha Boarding Kennels. To connect to the existing and consented walking and cycling infrastructure, a 4m wide footway and cycleway with a 0.5m wide verge would be provided along the southern side of the extended access road carriageway. Road markings and where necessary dropped kerbs can be provided in the interests of the safety of pedestrians using the nearby footpaths and bridleways. These highway improvements would help preserve pedestrian and cycle facility between Shilo Way and both the Bennerley Viaduct visitor centre development and the proposed development. Policy GI 4 Designated Local Green Spaces of the Awsworth Neighbourhood Plan promotes healthy lifestyles through walking and cycling. It is considered the proposal has been designed to preserve pedestrian and cyclist safety.
- 6.51** The proposed T-junction access has been designed in accordance with the Nottinghamshire County Council's Highway Design Guide in terms of width and visibility. The extended access road from the A6096 Shilo Way would be subject to a 30mph speed limit. A total of 48 car parking spaces provided at the site, including 6 EV charging bays and 3 accessible bays. This exceeds the minimum requirement of 21 spaces in accordance with the Highway minimum standards. This volume of car parking has been specifically requested by Broxtowe Borough Council and would ensure that no off-site parking would occur, which is appropriate given that parking on the access road or the A6096 Shilo Way would not be desirable in terms of road safety, and as such should be acceptable.
- 6.52** The proposed development would provide servicing parking and turning space. The applicant has advised that the site would be serviced by Transit/Box van style vehicles, and it is unlikely that articulated HGVs would be required to access the site. However, the service yard has been designed so that a HGV could safely enter and exit in a forward gear.
- 6.53** The submitted Transport Assessment advises the proposed development would generate up to 11 two-way vehicular trips in a peak hour. It is considered this would not be a significant increase and therefore is unlikely to have a severe impact on the operation of the highway network. It is noted that the consented traffic signal controlled junction for the residential development to the east would improve the function of the access road junction.

- 6.54** NCC Highway Authority have reviewed the submitted Transport Assessment and proposal and have provided no objections subject to conditioning that all parking/turning areas are hard surfaced with parking bays clearly marked out and that the proposed highway improvement works are implemented prior to the use of the development commencing. This would ensure that all footway and pedestrian crossings would be implemented to the satisfaction of the Highway Authority. Furthermore, NCC Rights of Way have provided no objections. National Highways have provided no objections to the proposed development as the works affecting the highway would take place on the local road network, managed by Nottinghamshire County Council.
- 6.55** Having regard to local policies contained within the Part 2 Local Plan and Awsworth Neighbourhood Plan and subject to the aforementioned conditions, it is considered that the impact on the safety or capacity of the highway would not be detrimental.
- 6.56** Ecology, Biodiversity and Trees
- 6.57** The application has been supported by an Ecological Impact Assessment. There are no statutory ecological sites on site. Policy 31 – Biodiversity of the Part 2 Local Plan states that permission will not be granted for development which would cause significant harm to sites and habitats of nature conservation or geological value, together with species that are protected or under threat. Support will be given to the enhancement and increase in the number of sites and habitats of nature conservation value. Policy GI 3 Biodiversity of the Awsworth Neighbourhood Plan advises that development proposals should preserve wildlife sites and ensure the protection of any priority species that may be affected.
- 6.58** It should be noted that Bennerley Coal Processing Plant and Grassland Local Wildlife Site has changed its boundary since the adoption of the Part 2 Local Plan. The proposed buildings do not fall within any part of this LWS. It should be noted part of the application site to the south-west of the proposed buildings would overlap with the LWS, this area is to be soft landscaped.
- 6.59** To the south of the site is the Nuthall Cutting and Kimberley Railway Green Infrastructure Corridor identified under Policy 28.1a of the Part 2 Local Plan and Policy GI 1 Green & Blue Infrastructure Network of the Awsworth Neighbourhood Plan. Green Infrastructure is defined for the purposes of the Green Infrastructure Strategy (GIS) and the Part 2 Local Plan as “a network of living multi-functional natural features, green spaces, rivers, canals and lakes that link and connect villages, towns and cities”. Policy 28 of the Part 2 Local Plan and GI 1 of the Awsworth Neighbourhood Plan advise proposals must maintain functionality and enhance such corridors that offer environmental and socio-economic benefits. To the east and south-west of the employment site are recreation routes protected under Policy 28.1e of the Part 2 Local Plan.
- 6.60** The proposed vehicle access partly overlaps with ‘Naptha Wood’ protected Local Green Space under Policy GI 4: Designated Local Green Spaces and protected woodland under Policy GI 5: Local Woodlands, Tree Belts & Hedgerows of the Awsworth Neighbourhood Plan. Proposals to improve walking and cycling access routes to a designated Local Green Space will be supported. Development

proposals that would result in the loss, damage or deterioration of protected woodland assets will not be supported unless the harm is outweighed by the benefits of the development and appropriate mitigation can be provided. NC 1 Nottingham Canal of the Awsworth Neighbourhood Plan advises that any development proposal should not cause harm to the Nottingham Canal which is a designated Local Nature Reserve. The Nottingham Canal is located to the south-east of the proposed buildings.

- 6.61** The Council's tree officer has reviewed the submitted Arboricultural Impact Assessment and has provided no objections. The Council's Parks and Open Spaces team have advised that biodiversity enhancement measures should include tree planting, habitat piles, reptile hibernaculums, bird and bat boxes. The submitted Ecological Appraisal advises that precautionary working measures, ecological enhancement measures and an Ecological Clerk of Works ECoW should be used to undertake checking surveys for species prior to the commencement of works.
- 6.62** It is considered that the proposed buildings and vehicle access would be sited away from the Nuthall Cutting and Kimberley Railway Green Infrastructure Corridor identified under Policy 28.1a of the Part 2 Local Plan and Policy GI 1 Green & Blue Infrastructure Network of the Awsworth Neighbourhood Plan. As such, it is considered that the proposal would not result in any loss of functionality of the corridor.
- 6.63** Part of the existing protected wooded area 'Napha Wood' is to be removed and replaced with the proposed vehicle access and new planting along the eastern boundary of the employment site. It is considered that after the construction period, walking and cycling access routes to Local Green Spaces listed under Policy GI 4 would not be affected. To offset loss of trees, new native planting is proposed along the eastern and northern boundaries. Furthermore, it is considered that the proposal would not adversely impact the nearby Nottingham Canal which is separated from the proposed buildings.
- 6.64** The application site has been amended to provide additional land for biodiversity enhancement. Overall, the application site consists of 2 parcels all contributing to the delivery of biodiversity net gain. Land to the east of Shilo Way is situated on land protected under Policy 28: Green Infrastructure Assets b) Playing pitches and e) Recreational routes. This parcel of land is only proposed for biodiversity enhancement and therefore it is considered to be policy compliant.
- 6.65** An amended biodiversity metric has been completed to provide an assessment of pre-development biodiversity value. The assessment of the development proposed for the site, would result in a net loss of biodiversity units across the site area from 9.13 units to 6.22 units resulting in -31.81% onsite BNG. The proposed biodiversity net gain scheme would deliver habitat enhancement on site. Notwithstanding this, to overcome the habitat unit deficit the applicant has confirmed 10% net gain can be achieved by use of offsite habitat banks. Subject to the biodiversity net gain planning condition, the development would achieve 10% in the form of onsite and offsite enhancements. As such, it is considered that the application would comply with Schedule 7A of the Town and Country Planning Act 1990 (as inserted by

Schedule 14 of the Environment Act 2021).

- 6.66** Overall, the development will not result in harm to protected species, designated sites or habitat. Subject to appropriate conditions covering mitigation and protection measures being satisfactory, the scheme is considered acceptable with respect to nature conservation and protected species. As such, it is considered that the proposal complies with relevant policies 28 and 31 of the Part 2 Local Plan and Policies GI 1, GI 3, GI 5 and NC 1 of the Awsworth Neighbourhood Plan.
- 6.67** Other Matters
- 6.68** The application site falls within the Coal Authority's defined Development High Risk Area. The Coal Authority have reviewed the submitted Coal Mining Risk Assessment Report (Rev B, December 2024) and no objections have been provided. The supporting information has demonstrated that the application site is safe and stable for the proposed development.
- 6.69** The Council's Contamination Officer has reviewed the Phase 2 Geo-Environmental Assessment Report (December 2024) and no objections have been provided with due regard for any potential ground, water or gas contamination risk caused by the proposed development. A condition has been recommended to cover the discovery of unexpected land contamination in the made ground during any development.
- 6.70** It should be noted that part of the application site overlaps with land identified under Policy BCDP 1 Former Bennerley Coal Disposal Point Land of the Awsworth Neighbourhood Plan. This policy advises that proposals for the use of the former Bennerley Coal Disposal Point site and access road for recreational purposes including a country park or informal public open space will be supported. However, only a relatively small area of application site overlaps with this designated area and only comprises of proposed landscaping. As such, there are limited concerns in this regard.
- 6.71** In terms of potential developer contributions, notwithstanding Policy 32 of the Part 2 Local Plan and Policy DC 1 of the Awsworth Neighbourhood Plan, no financial contributions will be sought as this is a Council planning application.
- 6.72** The site partly overlaps with the Policy 22 of the Greater Nottingham Strategic Plan (GNSP). Policy 22 of the GNSP allocates the Former Bennerley Coal Disposal Point for 61 hectares of rail-connected logistics development (Class B8 storage and distribution) which is to be delivered in conjunction with a Country Park. The policy also includes a minimum unit size of 9,000m² to ensure that the development meets strategic logistics need. The application for the employment starter units is located within this proposed allocation. It is considered that the proposed units would not be 'logistics' and would not accord with the minimum unit size requirements stated within the policy. An element of 'ancillary' uses may be accepted which help to support the wider logistics use. Nonetheless, the GNSP is at Regulation 19 stage and therefore in accordance with paragraph 49 of the NPPF very limited weight can be applied to the GNSP allocation.
- 6.73** The site lies within Flood Zone 1 and therefore is at a low risk of flooding.

Nottinghamshire County Council Lead Local Flood Authority have confirmed no objections to the proposed development subject to conditioning a detailed surface water strategy be submitted.

- 6.74** The proposed development has been designed to ensure adherence with Policy 1 – Climate Change of the Part 1 Local Plan and Policy 20 – Air Quality of the Part 2 Local Plan. It is proposed that the construction and operation of the proposal would follow sustainable building design principles. The site layout would include 6 electric vehicle charging points in the interests of air quality.

6.75 Planning Balance

What are Very Special Circumstances

- 6.76** What is proposed is inappropriate development in the Green Belt. The main issue to assess is whether any of the above matters taken individually or collectively, amount to the VSC necessary to outweigh the harm to the Green Belt through inappropriateness.

- 6.77** What constitutes VSC will depend on the weight of each of the factors put forward and the degree of weight to be accorded to each is a matter for the decision taker. Firstly, it is to determine whether any individual factor taken by itself outweighs the harm. Secondly to consider whether a number of factors combine to create VSC.

- 6.78** The weight to be given to any particular factor will be a matter of degree and planning judgement. There is no formula for providing a ready answer to any development control question on the Green Belt. Neither is there any categorical way of deciding whether any particular factor or factors would constitute VSC but the case must be decided on the planning balance qualitatively rather than quantitatively.

- 6.79** In weighing up any of the circumstances put forward, the positive measures outlined in the above paragraphs to mitigate the impacts of the development, do not contribute collectively to VSC to be weighed up in the planning balance. These are simply to secure a satisfactory development. Therefore, the acceptability or not of this development is based on an assessment of VSC.

6.80 Kimberley Levelling Up Fund (time-limited opportunity)

- 6.81** Broxtowe Borough Council applied for and was successful in being awarded £16.5 million in January 2023 for government funding for a project called “Kimberley Means Business.” The key rationale for the project was to replace jobs and opportunities that had been lost in that community over several years.

- 6.82** Part of the bid is based on the need to deliver new business premises to replace those sites lost to housing development, and it is proposed to redirect some of LUF resources to deliver the proposed development. It is understood that the LUF funding must be contractually committed before 31st March 2025 and substantially developed by 31st March 2026, there is a significant risk that it will be lost and that the opportunity to safeguard and generate jobs and secure associated economic

benefits will have been missed. The utilisation of the funding to deliver new jobs is proposed as a 'Very Special Circumstance' that warrants the development in the Green Belt.

- 6.83** Under s70(2)(b) Local Planning Authorities may have regard to material considerations including "any local finance considerations, so far as material to the application". S70(4) provides:

"local finance consideration" means—

(a) a grant or other financial assistance that has been, or will or could be, provided to a relevant authority by a Minister of the Crown, or

(b) sums that a relevant authority has received, or will or could receive, in payment of Community Infrastructure Levy;

"Minister of the Crown" has the same meaning as in the Ministers of the Crown Act 1975;

"relevant authority" means—

(a) a district council;

- 6.84** The National Planning Practice Guidance (PPG) advises that, in deciding an application for planning permission or appeal where a local financial consideration is material, decision takers need to ensure that the reasons supporting the decision clearly state how the consideration has been taken into account and its connection to the development.

- 6.85** In this case, the Kimberley Levelling Up Fund (LUF) is the 'local finance consideration' and it is designed to invest in new employment space that offers local socio-economic benefits. It is considered that the time-limited opportunity to spend or lose the awarded funding and the resulting jobs and investment in an area targeted for Levelling Up, should be afforded significant weight.

Employment Need

- 6.86** The submitted Planning Statement shows that the proposed units would help meet the Council's employment need (Nottingham Core HMA and Nottingham Outer HMA Employment Land Needs Study 2021 and Greater Nottingham Strategic Plan Publication Draft: Employment Background Paper September 2024). However, Policy 5 - of the Greater Nottingham Strategic Plan Publication Draft (GNSP) states that a sufficient supply of industrial and warehousing space will be provided through 'future plan preparation' and does not say that the employment need should take priority over other policy considerations.

- 6.87** The Greater Nottingham Strategic Plan Publication Draft: Employment Background Paper September 2024 shows across the plan area there is a surplus of employment land, paragraph 6.3 states:

"In terms of industrial/warehousing supply there is a surplus of potential

employment land across the Plan Area of approximately 60 ha.” In addition, strategic allocations at Toton, Ratcliffe on Soar (Rushcliffe) and Top Wighay Farm (Gedling) will contribute to meeting any identified need.”

- 6.88** The Employment Land Study, produced to support the Greater Nottingham Strategic Plan, paragraph 7.21 states:

“Overall, the assessments of existing sites indicate that across the 77 Core HMA sites assessed, there is a strong supply of employment sites that vary in their scale and provision of facilities to satisfy their occupiers’ needs: from City Centre sites, to traditional industrial estates, modern office accommodation and rural sites for niche (generally indigenous) uses. The majority of the sites assessed accommodated a mix of office, light industry, B2 and B8 uses.”

- 6.89** Notwithstanding this, it is noted that the justification used for the LUF bid identifies a local need for new business premises. Broxtowe Borough Council’s Economic Development team have highlighted that new industrial employment space was a priority in the 2017-21 Economic Regeneration Strategy. The LUF bid highlighted that the rate of decline of Broxtowe’s industrial stock has outpaced neighbouring local authorities and left unmet local demand. As such, providing the proposed units could therefore be highly beneficial for local businesses and in turn the local economy. More recently, the Economic Development Regeneration Strategy 2022-2028 indicates that there is a lack of space for new businesses to develop and grow, including co-working, office and industrial space and industrial starter units.

- 6.90** The applicant has advised that in the period since 2018, the 5 years before the bid was submitted, the amount of employment space for local businesses significantly declined. Within a three-mile radius of Kimberley town centre 346,793 sq. ft. of industrial and commercial space was lost to other uses, predominantly housing. The local property market lacks modern industrial units to compete with as nearly 2/3 of the stock was built before 1970. To put this in context Broxtowe experienced a net loss of 24.9% in the study period that informed the Core Strategy and the local figure was estimated to be well above the average of the Core HMA’s total 16% loss of employment land (Nottingham Core HMA and Nottingham Outer HMA Employment Land Needs Study 2021). This set against the 8.9% growth in the East Midlands as a whole made for challenging conditions which the bid tried to address on a local scale. The reduction in the local GDP that this represented was a significant factor in case for awarding the Council funding, of which £4.6 million was available to develop industrial units to support local growth.

- 6.91** The applicant has also advised that Broxtowe is heavily reliant on a small business base, dominated by firms comprising 0 to 9 employees (89.3% of enterprises). Indeed, the Council which has a stock of around 62 small industrial units has a waiting list and has done so for over 8 years. At times there have been as many as 45 firms on the waiting list, with the current median size requirement of 1,908 sq.ft. The Council also has four existing tenanted firms requiring expansion from their smaller units and premises. The sizes required for expansion range from 3,000 sq.ft. to 8,500 sq.ft. and a failure to identify units to grow-on presents a realistic danger of these firms needing to leave Broxtowe to grow elsewhere.

- 6.92** Kimberley LUF data used in the bid identified that there are pockets of significant deprivation in Kimberley. Contained within the Indices of Multiple Deprivation Analysis for Kimberley, one area stands out as facing multiple deprivation, with the area falling within the 30% most deprived areas in England overall. As such, the Kimberley LUF bid demonstrated emerging priorities for increased investment in employment space to help starter businesses grow in the local area.
- 6.93** In consideration of the above, weight is afforded to an identified local employment need.

Economic Benefits

- 6.94** The application has been supported by an Economic Benefits Statement (EBS September 2024) which considers the existing socio-economic conditions within Broxtowe and the quantifiable economic impact that will be generated by the proposed development during both its initial construction phase and subsequent operational lifetime.
- 6.95** Paragraph 85 of the NPPF advises that planning decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development
- 6.96** Policy 4 - Employment Provision and Economic Development of the Broxtowe Aligned Core Strategy requires Councils to ensure that a sufficient supply of employment land is provided for new and relocating industrial and warehouse uses. Policy E 2: Encouraging Small Businesses of the Awsworth Neighbourhood Plan supports proposals for new small-scale business premises.
- 6.97** The rationale for the development and the utilisation of the LUF funding are the economic benefits that will result from the proposed development. The following construction and operational benefits have been estimated:

Construction Benefits

- Direct and indirect construction-related employment. The proposed development will support up to 24 temporary roles on-site and in the wider economy over the one-year build programme.
- Contribution of construction phase to economic output. An estimated £1.5million of gross value added (GVA – a proxy for economic output) will be generated during the construction period in current prices.

Operational Benefits

- Gross jobs supported on-site. The proposed development could support between 24-40 permanent full-time equivalent (FTE) jobs on-site once it is built and operational.

- Contribution to economic output. The GVA attributable to the site once operational is estimated to be around £1.4million per annum, or £12million over ten-years (present value).
 - Business rates. It is estimated that annual business rates generated by the Proposed Development could be in the region of £22,000 per annum.
 - Employee wages. The proposed development will generate up to £0.8million per annum in wages for on-site employees.
- 6.98**

In light of the above economic benefits, weight is afforded to the creation of on-site employment as well as direct and non-direct jobs which benefits the Borough, however there are concerns with the scale of the economic benefits offered as a VSC.

6.99 Locational Justification

Due to the site being located within the Green Belt the applicant was asked to justify why this site was chosen, and why other sites not in the Green Belt could not be utilised to the same benefit. As such, the applicant submitted an Alternative Site Assessment (ASA).

6.100

The scope for the alternative site search was geographically constrained and limited to sites that were deemed to be appropriate for the receipt and utilization of the LUF funding awarded for Kimberley. The applicant has confirmed that an analysis of the area around Kimberley was conducted ahead of the LUF bid and after being awarded the funding. Broxtowe Borough Council and Kimberley Town Council were heavily involved in the bid development and no land for industrial units was available for the development of small business units or could be identified.

6.101 In order for a site to be a reasonable alternative to the application site, it must be:

- Available – with a willing landowner who wants to bring the site forward for the intended development.
- Suitable – it must be technically capable of accommodating the development in terms of various matters including site, size, topography and be able to be accessed for construction and operation.
- Viable – it must be economically feasible for a developer to deliver the infrastructure on the site in relation to development and land cost.

6.102 Within the submitted ASA, sites taken as not suitable would include:

- Those with planning allocations for other uses.
- Those which benefitted from recent planning permissions.
- Designated environmental sites/assets.
- Flood risk zones 2 and 3.
- Sites smaller than the required area of 0.4 hectares.

6.103 The supporting ASA has identified sites including existing employment land identified under Policy 9 of the Part 2 Local Plan. The applicant has confirmed that land to the rear of the Hovis Factory ('Fernwood Site') granted planning permission

for 22 light industrial units (ref. 20/00423/FUL) off Main Road was unavailable for sale. As such, this site has been discounted as the land could not be purchased using the LUF funding. Furthermore, land north of the Hovis Factory, off Common Lane has been discounted due to environmental constraints. After undertaking a local property search no industrial sites in the Watnall, Giltbrook or Awsworth existing employment sites were marketed for sale. Sites available for lease would not meet the requirements of the LUF funding. It has been confirmed that Broxtowe Borough Council were previously unsuccessful in acquiring an alternative site located at Digby Street football ground in Kimberley. However, the site was discounted due to viability issues caused by the need for the creation of a new vehicle access to serve the proposed development.

- 6.104** The applicant has submitted supporting information demonstrating that all of the remaining area of land that isn't constrained by the above, and that isn't occupied urban land, is within the Green Belt. Weight is afforded to the attempts made by Broxtowe Borough Council to acquire an alternative site within a limited time period to ensure the delivery of the LUF. Weight is also afforded to the lack of sites that are available, suitable and viable within the Kimberley LUF search area and not in the Green Belt.

Other harm

- 6.105** The development would fail to preserve the openness of the Green Belt both spatially and visually and would be contrary to Policy 8 of the Part 2 Local Plan and the NPPF. As such, weight should be afforded to the impact upon the openness of the Green Belt in this location. The harm arising from the development includes the harm to the character and appearance of the area including part of the site located within local character area (LCA) Erewash River Corridor and Babbington Rolling Farmlands part of the Greater Nottingham Landscape Character Assessment (GNLCA) which is protected under Policy 30 of the Part 2 Local Plan. Furthermore, weight should be afforded to the harm to the character of the Parish landscape with regard to character related policies including Policies GI 2 and GI 5.
- 6.106** Limited weight is afforded to any potential harm to the historic character of the nearby Grade II* Bennerley Viaduct or its setting due to the separation distance of the proposed development, detached orientation, varying topography and woodland screening. Furthermore, it is considered that there would be limited harm to the special character of the Great Northern Line Local Area due to the separation of the built development and preservation of pedestrian corridors.

Balancing whether VSC

- 6.107** As a preliminary point, it is not the case that each material consideration that together make up the 'VSC' itself needs to be 'very special'. It is considered that the VSCs provided have been finely balanced in the assessment of this application.
- 6.108** Substantial weight is afforded to the time limited opportunity of the proposal to ensure the LUF is contractually committed by 31st March 2025 and that national government funding (£4m - £5.5m) is not lost in the interests of generating employment.

6.109 Moderate weight is afforded to the opportunity for the proposal to meet an identified local employment need.

6.110 Less weight is afforded to the construction and operational economic benefits associated with the proposal.

Less weight is afforded to the attempts to find alternative sites.

6.111 It is considered that, the above factors taken collectively do amount to the VSC and are sufficient to clearly outweigh the harm by reason of inappropriateness, the harm to the openness of the Green Belt and the harm to the character and appearance of the area.

7.0 Conclusion

7.1 The application proposes the construction of two light industrial buildings comprising of five employment starter units.

7.2 The development would be inappropriate development in the Green Belt resulting in harm by definition to which substantial weight is applied. In addition, there would be harm to the openness of the Green Belt both spatially and visually.

7.3 The development would also be harmful to the character and appearance of the locality. However, due to the siting and design of the proposal the development would be limited in any harm to heritage assets.

7.4 The impacts of the development are acceptable (subject to the below) with respect to the Heritage Assets, Highway Safety, Ecology / BNG and Residential Amenity.

7.5 Overall, it is concluded that there are VSC which, taken collectively, are sufficient to clearly outweigh the harm by reason of inappropriateness, the harm to the openness of the Green Belt and the harm to the character and appearance of the area.

7.6 Should the Committee be minded to grant planning permission, the application would be referred to the Secretary of State under the Town and Country Planning (Consultation) (England) Direction 2024 with the Planning Committee's resolution to support it.

8.0 Recommendation

8.1 It is recommended that planning permission be Granted subject to the following conditions for the reasons stated below.

<u>Recommendation</u>	
The Committee is asked to RESOLVE that planning permission be granted subject to conditions outlined in the appendix.	
1.	<p>The development hereby approved shall be begun before the expiration of 3 years from the date of this permission.</p> <p>Reason: To comply with the requirements of Section 91 of the Town and Country Planning Act 1990 as amended.</p>
2.	<p>This permission shall be read in accordance with the following plans:</p> <ul style="list-style-type: none"> • 1001 P03 Landscape Plan (Received by the Local Planning Authority 24/01/25) • 1000 P07 Location Plan • 1001 P05 Existing Site Pan • 1002 P05 Existing Detailed Site Plan • 1010 P01 Masterplan • 1011 P07 Proposed Site Plan • 1012 P06 Proposed Detailed Site Plan • 1015 P04 Proposed Site Sections (Received by the Local Planning Authority 22/01/25) • 32 Proposed Sub Station (Received by the Local Planning Authority 10/01/25) • 20 P02 Unit 1 GA Plan • 25 P02 Unit 2 GA Plan • 22 P05 Unit 1 Elevations • 27 P04 Unit 2 Elevations (Received by the Local Planning Authority 16/10/24) • 21 P01 Unit 1 Roof Plan • 23 P02 Unit 1 3D View • 26 P01 Unit 2 Roof Plan • 28 P01 Unit 2 3D Views • 30 Cycle Shelter • 31 Bin Store 1 • D53703/JB/A External Lighting Plan (Received by the Local Planning Authority 03/10/24) <p>Reason: To ensure that the development takes the form envisaged by the Local Planning Authority when determining the application.</p>

3. No part of the development hereby approved shall commence until a detailed surface water drainage scheme based on the principles set forward by the approved Flood Risk Assessment (FRA) and Drainage Strategy HSP2024-C4713-C&S-FRAS1-2499, September 2024, hsp consulting., has been submitted to and approved in writing by the Local Planning Authority in consultation with the Lead Local Flood Authority. The scheme shall be implemented in accordance with the approved details prior to completion of the development. The scheme to be submitted shall:
- Demonstrate that the development will use SuDS throughout the site as a primary means of surface water management and that design is in accordance with CIRIA C753 and NPPF Paragraph 175.
 - Limit the discharge generated by all rainfall events up to the 100 year plus 40% (climate change) critical rain storm to QBar rates for the developable area.
 - Provide detailed design (plans, network details, calculations and supporting summary documentation) in support of any surface water drainage scheme, including details of any attenuation system, the outfall arrangements and any private drainage assets.
- Calculations should demonstrate the performance of the designed system for a range of return periods and storm durations inclusive of the 1 in 1 year, 1 in 30 years and 1 in 100 years plus climate change return periods.
- No surcharge shown in a 1 in 1 year.
 - No flooding shown in a 1 in 30 years.
 - For all exceedance to be contained within the site boundary without flooding properties in a 100 year plus 40% storm.
- Evidence to demonstrate the viability (e.g. Condition, Capacity and positive onward connection) of any receiving watercourse to accept and convey all surface water from the site.
 - Details of STW approval for connections to existing network and any adoption of site drainage infrastructure.
 - Evidence of approval for drainage infrastructure crossing third party land where applicable.
 - Provide a surface water management plan demonstrating how surface water flows will be managed during construction to ensure no increase in flood risk off site.
 - Evidence of how the on-site surface water drainage systems shall be maintained and managed after completion and for the lifetime of the development to ensure long term effectiveness.

	<p>Reason: To ensure the proposed development has sufficient surface water management in accordance with Policy 1 - Climate Change of the Broxtowe Aligned Core Strategy Part 1 Local Plan 2014, Policy 1: Flood Risk of the Broxtowe Part 2 Local Plan 2019 and Part 14 - Meeting the challenge of climate change, flooding and coastal change of the NPPF 2024.</p>
<p>4.</p>	<p>No development hereby approved shall take place until a Construction / Demolition Method Statement has been submitted to and approved in writing by the Borough Council. The statement shall include:</p> <ul style="list-style-type: none"> a) The means of access for construction traffic; b) parking provision for site operatives and visitors; c) the loading and unloading of plant and materials; d) the storage of plant and materials used in construction / demolition the development; e) a scheme for the recycling/disposal of waste resulting from construction / demolition works / site clearance; and f) details of dust and noise suppression to be used during the construction phase. <p>The approved statement shall be adhered to throughout the construction period.</p> <p>Reason: To protect the amenity of neighbouring residents in accordance with Policy 17 - Place-making, Design and Amenity, Policy 19 – Pollution, Hazardous Substances and Ground Conditions of the Broxtowe Part 2 Local Plan 2019 and Policy BED 3: Design Principles of the Awsworth Neighbourhood Plan 2021.</p>
<p>5.</p>	<p><u>Statutory Biodiversity – Deemed Condition</u></p> <p>Biodiversity Net Gain (BNG) of 10% for developments is a mandatory requirement in England under the Environment Act 2021.</p> <p>The effect of the relevant paragraphs of Schedule 7A to the Town and Country Planning Act 1990 is that planning permission granted for the development of land in England is deemed to have been granted subject to the condition (the biodiversity gain condition) that development may not begin unless:</p> <ul style="list-style-type: none"> a. a Biodiversity Gain Plan has been submitted to the planning authority, and b. the planning authority has approved the plan. <p>The planning authority, for the purposes of determining whether to approve a Biodiversity Gain Plan if one is required in respect of this permission would be Broxtowe Borough Council.</p> <p>Key Requirements:</p>

A Biodiversity Gain Plan (BGP) must be submitted to the Local Planning Authority, in writing no earlier than the day after planning permission has been granted and should be in accordance with the BNG Metric received by the Local Planning Authority on 21 January 2024, prepared by Charlotte Mercer Principal Ecologist M.Sc. B.Sc. (Hons).

The biodiversity gain plan must include:

- (a) information about the steps taken or to be taken to minimise the adverse effect of the development on the biodiversity of the onsite habitat and any other habitat;**
- (b) the pre-development biodiversity value of the onsite habitat;**
- (c) the post-development biodiversity value of the onsite habitat;**
- (d) any registered offsite biodiversity gain allocated to the development and the biodiversity value of that gain in relation to the development;**
- (e) any biodiversity credits purchased for the development; and**
- (f) any such other matters as the Secretary of State may by regulations specify.**

When calculating the post-development biodiversity value of a habitat, the planning authority can only take into account an increase in biodiversity value post development where it is satisfied that the habitat creation or enhancements delivering the increase will be maintained for at least 30 years after the development is completed. This must be secured either by a planning condition, planning obligation, or conservation covenant

Template available here;

<https://www.gov.uk/government/publications/biodiversity-gain-plan>

The development shall not commence until a Habitat and Monitoring Management Plan (HMMP) has been submitted to ensure that the development meets all the requirements of the Biodiversity Gain Plan (BGP).

The Habitat Management and Monitoring Plan (the HMMP) must include:

- (a) a non-technical summary;**
- (b) the roles and responsibilities of the people or organisation(s) delivering the HMMP;**
- (c) the planned habitat creation and enhancement works to create or improve habitat to achieve the biodiversity net gain in accordance with the approved Biodiversity Gain Plan;**
- (d) the management measures to maintain habitat in accordance with the approved Biodiversity Gain Plan for a period of 30 years from the completion of development; and**
- (e) the monitoring methodology and frequency in respect of the created or enhanced habitat to be submitted to the local planning authority,**

	<p>Template available here; https://publications.naturalengland.org.uk/publication/5813530037846016</p> <p>Notice in writing shall be given to the Council when the: (a) HMMP has been implemented; and (b) habitat creation and enhancement works as set out in the HMMP have been completed.</p> <p>No part of the development hereby approved shall be occupied until: (a) the habitat creation and enhancement works set out in the approved HMMP have been completed; and (b) a completion report, evidencing the completed habitat enhancements, has been submitted to, and approved in writing by the Local Planning Authority</p> <p>The created and/or enhanced habitat specified in the approved HMMP shall be managed and maintained in accordance with the approved HMMP.</p> <p>Monitoring reports shall be submitted to local planning authority in writing in accordance with the methodology and frequency specified in the approved HMMP.</p> <p>Reason: To ensure the development delivers a biodiversity net gain on or off site in accordance with the relevant paragraphs of Schedule 7A of the Town and Country Planning Act 1990.</p>
<p>6.</p>	<p>No development above slab level shall commence until written and illustrative details of the number, siting, and design of the electric vehicle charging points have been submitted to and approved in writing by the Local Planning Authority. No commercial unit shall be occupied until the electric vehicle charging points have been provided in accordance with the approved details.</p> <p>Reason: To future proof the development and in the interests of air quality in accordance with Policy 1 - Climate Change of the Broxtowe Aligned Core Strategy Part 1 Local Plan 2014, Policy 17 - Place-making, Design and Amenity and Policy 20: Air Quality of the Broxtowe Part 2 Local Plan 2019.</p>
<p>7.</p>	<p>No part of the development hereby permitted shall be brought into use until the parking, turning and servicing areas are surfaced in a bound material with the parking bays clearly delineated in accordance with drawing number 207 56 THP XX XX DR A 1012 P06 (received 22/01/25). The parking, turning and servicing areas shall be maintained in the bound material for the life of the development and shall not be used for any purpose other than the parking, turning and loading and unloading of vehicles.</p>

	<p>Reason: In the interests of highway safety in accordance with Policy 17 - Place-making and Design and Amenity of the Broxtowe Part 2 Local Plan (2019) and Policy TT 2: Car Parking of the Awsworth Neighbourhood Plan 2021.</p>
8.	<p>No part of the development hereby permitted shall be brought into use until the highway works as shown for indicative purposes only on drawing number 207 56 THP XX XX DR A 1012 P06 (received 22/01/25) have been provided to the satisfaction of the Local Planning Authority.</p> <p>Reason: In the interests of highway safety in accordance with Policy 17 - Place-making and Design and Amenity of the Broxtowe Part 2 Local Plan (2019) and TT 1: Traffic Management of the Awsworth Neighbourhood Plan 2021.</p>
9.	<p>The approved landscaping shall be carried out in accordance with the approved drawing 1001 P03 Landscape Plan (received 24/01/25) not later than the first planting season following the substantial completion of the development or occupation of the building, whichever is the sooner and any trees or plants which, within a period of 5 years, die, are removed or have become seriously damaged or diseased shall be replaced in the next planting season with ones of similar size and species.</p> <p>Reason: To ensure that the details are satisfactory in the interests of the appearance of the area and in accordance with Policy 10 - Design and Enhancing Local Identity of the of the Aligned Core Strategy Part 1 Local Plan 2014 and Policy 17 - Place-making, Design and Amenity of the Broxtowe Part 2 Local Plan (2019).</p>
10.	<p>The development hereby approved must be carried out in accordance with the precautionary working measures, ecological enhancement measures and an Ecological Clerk of Works ECoW is used to undertake checking surveys for species prior to the commencement of works contained within Section 4.0 Potential Impacts and Recommendations of the submitted Ecological Appraisal produced by AES-LTD (Received by the Local Planning Authority 03/10/24).</p> <p>Reason: In the interests of securing biodiversity enhancements and the protection of protected species in accordance with Policy 17 - Biodiversity of the Broxtowe Aligned Core Strategy Part 1 Local Plan 2014, Policy 31 - Biodiversity Assets of the Broxtowe Part 2 Local Plan 2019 and Policy GI 3: Biodiversity of the Awsworth Neighbourhood Plan 2021.</p>
11.	<p>The development hereby approved must be carried out in accordance with the tree protection measures contained within Appendix 3 of the submitted BS 5837:2012 Arboricultural Report, Impact Assessment and Method Statement produced by Treefellas Arboriculture Limited (Received by the Local Planning Authority 03/10/24).</p>

	<p>Reason: To ensure protection during construction works of trees and hedgerows which are to be retained on or near the site in order to ensure that the character and amenity of the area is not impaired, in order to comply with Policy 17 - Biodiversity of the Broxtowe Aligned Core Strategy Part 1 Local Plan 2014, Policy 31 - Biodiversity Assets of the Broxtowe Part 2 Local Plan 2019 and Policy GI 5 Local Woodlands, Tree Belts & Hedgerows of the Awsworth Neighbourhood Plan 2021.</p>
<p>12.</p>	<p>The premises shall not operate except between 07.30-22.00 hours daily.</p> <p>Reason: To protect the immediate residents from excessive operational noise in accordance with Policy 17 - Place-making, Design and Amenity, Policy 19 – Pollution, Hazardous Substances and Ground Conditions of the Broxtowe Part 2 Local Plan 2019 and Policy BED 3: Design Principles of the Awsworth Neighbourhood Plan 2021.</p>
<p>13.</p>	<p>No construction or site preparation work in association with this permission shall be undertaken outside of the hours of 08:00-18.00 Monday to Friday, 08:00-13:00 Saturdays and at no time on Sundays or Bank Holidays.</p> <p>Reason: To protect nearby occupants from excessive construction noise and vibration in accordance with Policy 17 - Place-making, Design and Amenity, Policy 19 – Pollution, Hazardous Substances and Ground Conditions of the Broxtowe Part 2 Local Plan 2019 and Policy BED 3: Design Principles of the Awsworth Neighbourhood Plan 2021.</p>
<p>14.</p>	<p>No materials produced as a result of the site’s operational activities, development or clearance shall be burned on site. All reasonable steps, including damping down site roads, shall be taken to minimise dust and litter emissions whilst the activities are in operation.</p> <p>Reason: To protect nearby residents from excessive air pollution in accordance with Policy 17 - Place-making, Design and Amenity, Policy 19 – Pollution, Hazardous Substances and Ground Conditions of the Broxtowe Part 2 Local Plan 2019 and Policy BED 3: Design Principles of the Awsworth Neighbourhood Plan 2021.</p>
<p>15.</p>	<p>In the event that contamination is found at any time when carrying out the approved development it must be reported in writing immediately to the Local Planning Authority and once the Local Planning Authority has identified the part of the site affected by the unexpected contamination development must be halted on that part of the site.</p> <p>An assessment must be undertaken in accordance with the requirements of the Local Planning Authority, and where remediation is necessary a remediation scheme, together with a timetable for its implementation and verification reporting, must be submitted to and approved in writing by the Local Planning Authority.</p>

	<p>Reason: In the interest of public health and safety in accordance with Policy 17 - Place-making, Design and Amenity and Policy 19 – Pollution, Hazardous Substances and Ground Conditions of the Broxtowe Part 2 Local Plan 2019.</p>
	<p>NOTES TO APPLICANT</p>
1.	<p>The Council has acted positively and proactively in the determination of this application by working to determine it within the agreed determination timescale.</p>
2.	<p>If any coal mining features are unexpectedly encountered during development, this should be reported immediately to the Coal Authority on 0800 288 4242. Further information is available on the Coal Authority website at: www.gov.uk/government/organisations/the-coal-authority</p>
3.	<p>In order to carry out the off-site works required you will be undertaking work in the public highway which is land subject to the provisions of the Highways Act 1980 (as amended) and therefore land over which you have no control. In order to undertake the works, you will need to enter into an agreement under Section 278 of the Act. Please contact hdc.south@nottscc.gov.uk for details.</p>
4.	<p>As this permission relates to the creation of a new unit(s), please contact the Council's Street Naming and Numbering team: 3015snn@broxtowe.gov.uk to ensure addresses are created. This can take several weeks and it is advised to make contact as soon as possible after the development commences. A copy of the decision notice, elevations, internal plans and a block plan are required. For larger sites, a detailed site plan of the whole development will also be required.</p>

Site Location Plan (not to scale)

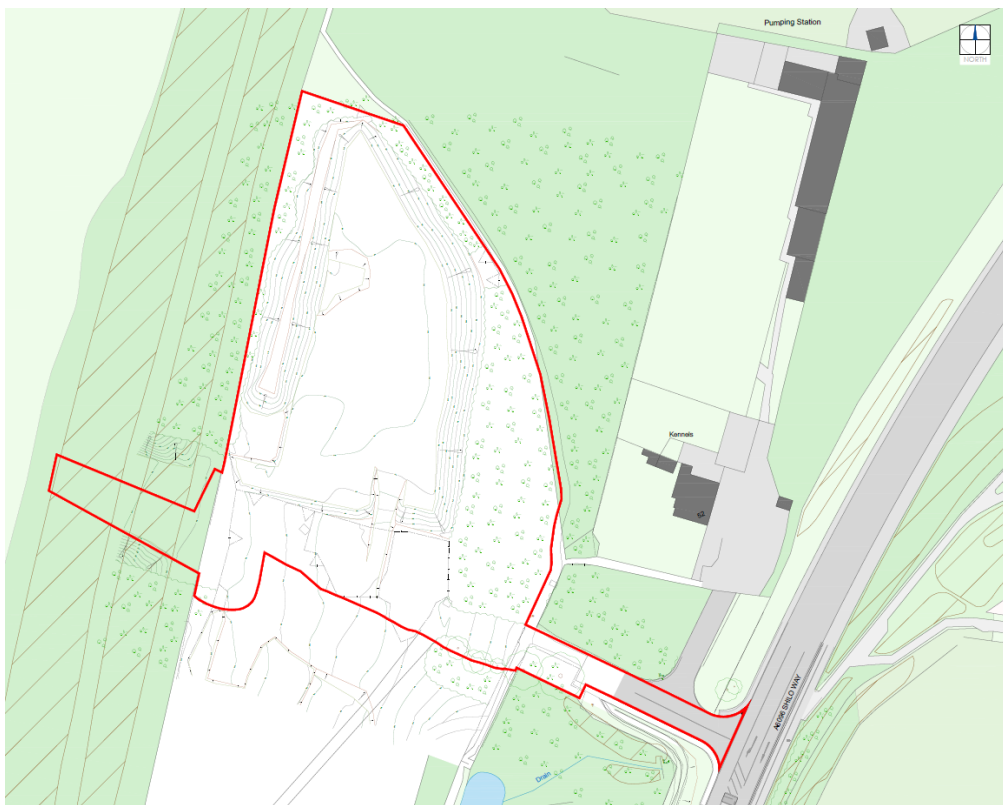


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|---|--|---|--|
| <ul style="list-style-type: none"> Site Green Belt Byway open to all traffic Bridleway Footpath Local Wildlife Site Housing Allocations Green Infrastructure Corridor (Indicative, GI1) | <p>Policies 3.1, 3.3 to 3.8, 4.1, 5.1, 6.1, 7.1 to 7.3</p> | <ul style="list-style-type: none"> Sustainable Transport (TT3) Bennerley Viaduct Eastern Access (BV1) Bennerley Viaduct (BV1) Bennerley Viaduct Visual Setting (BV2) Coal Disposal Point (BCDP1) Great Northern Corridor (BED2, BV1) | <ul style="list-style-type: none"> Historic Core (BED2) Landscape Character Areas (Policy GI2) Local Green Space (GI4) Local Heritage Assets (BED1) Local Nature Reserves (NC1) Local Wildlife Sites (GI3) Trees and Hedgerows (GI5) |
|---|--|---|--|

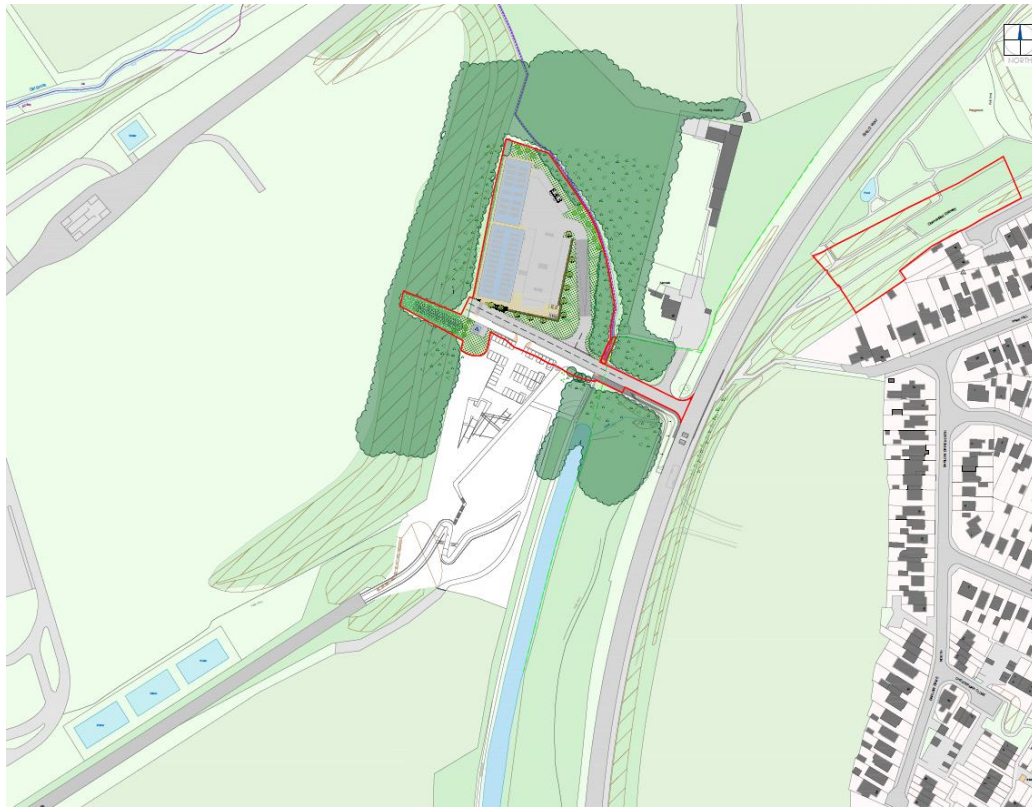
Proposed Site plan



Existing Site Plan



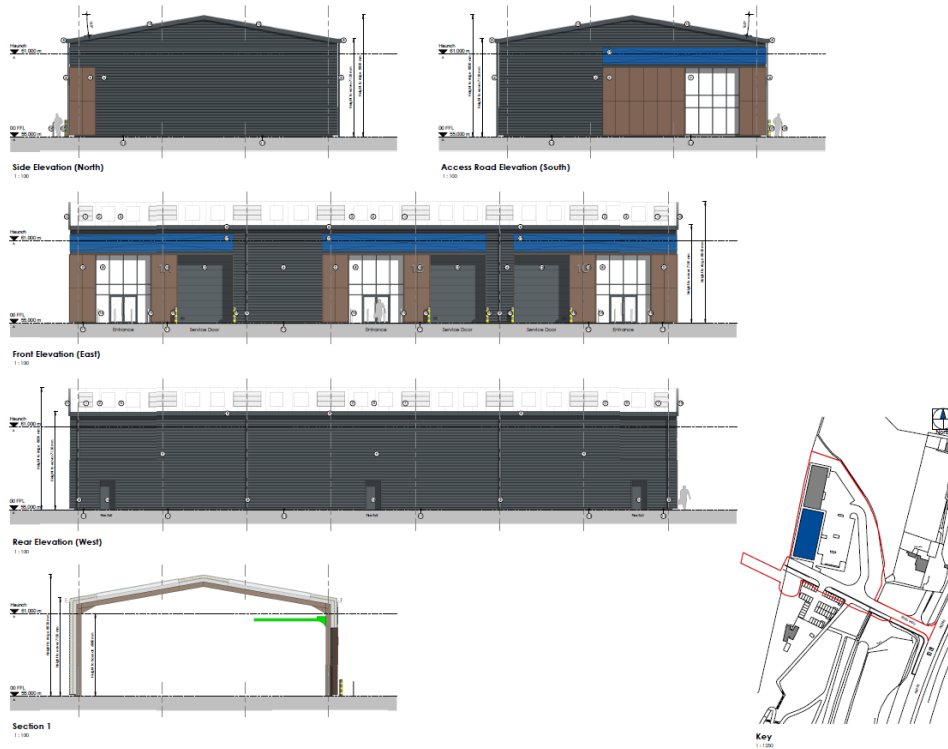
Masterplan



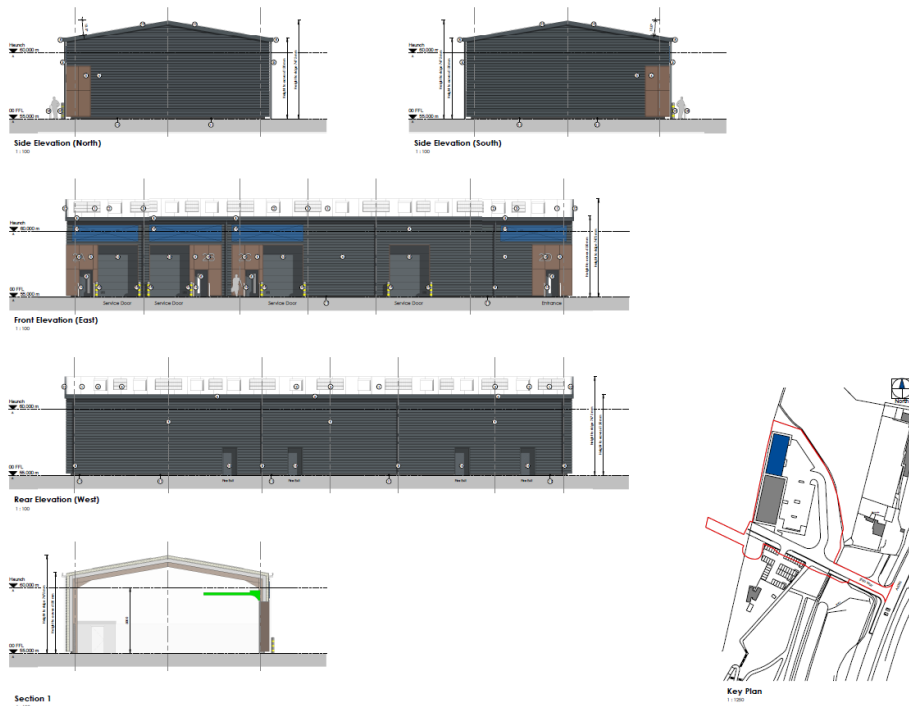
Landscaping Plan



Unit 1 Proposed Elevations



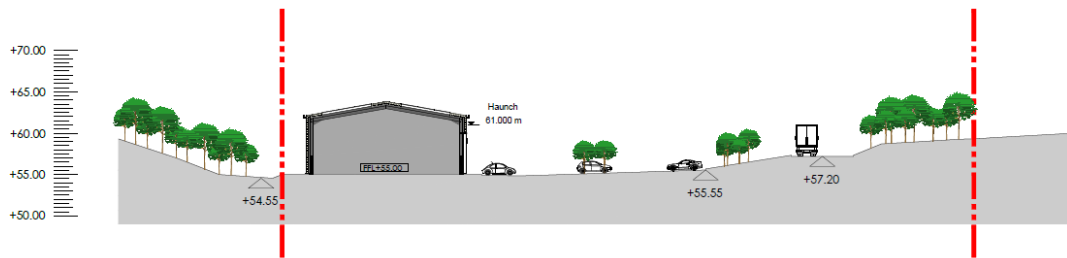
Unit 2 Proposed Elevations



Proposed Site Sections



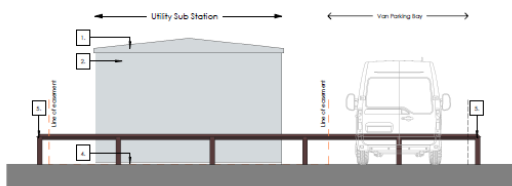
SECTION A-A'



SECTION B-B'

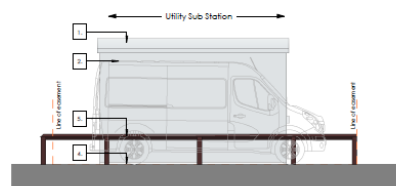


Proposed Substation Drawings



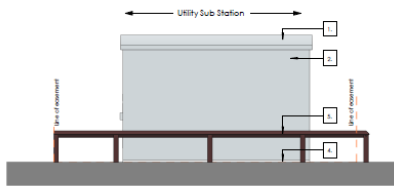
Rear Elevation

1:50



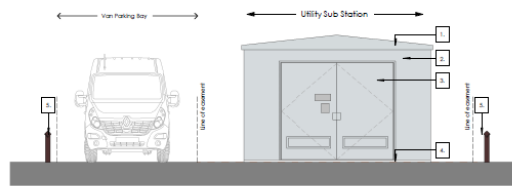
Side Elevation

1:50



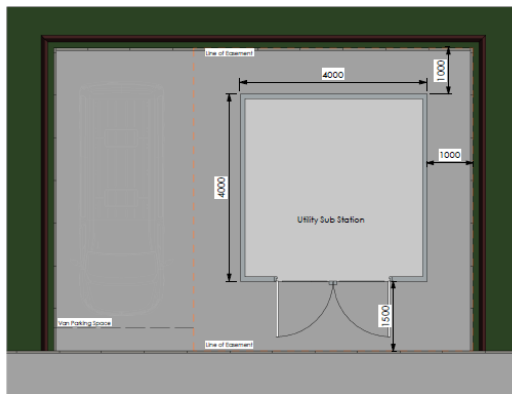
Side Elevation

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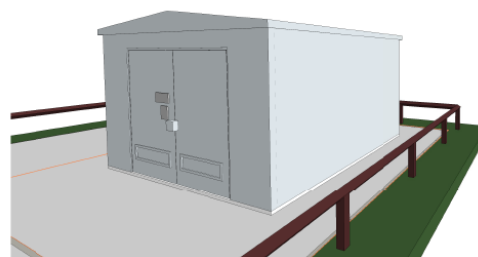
Front Elevation

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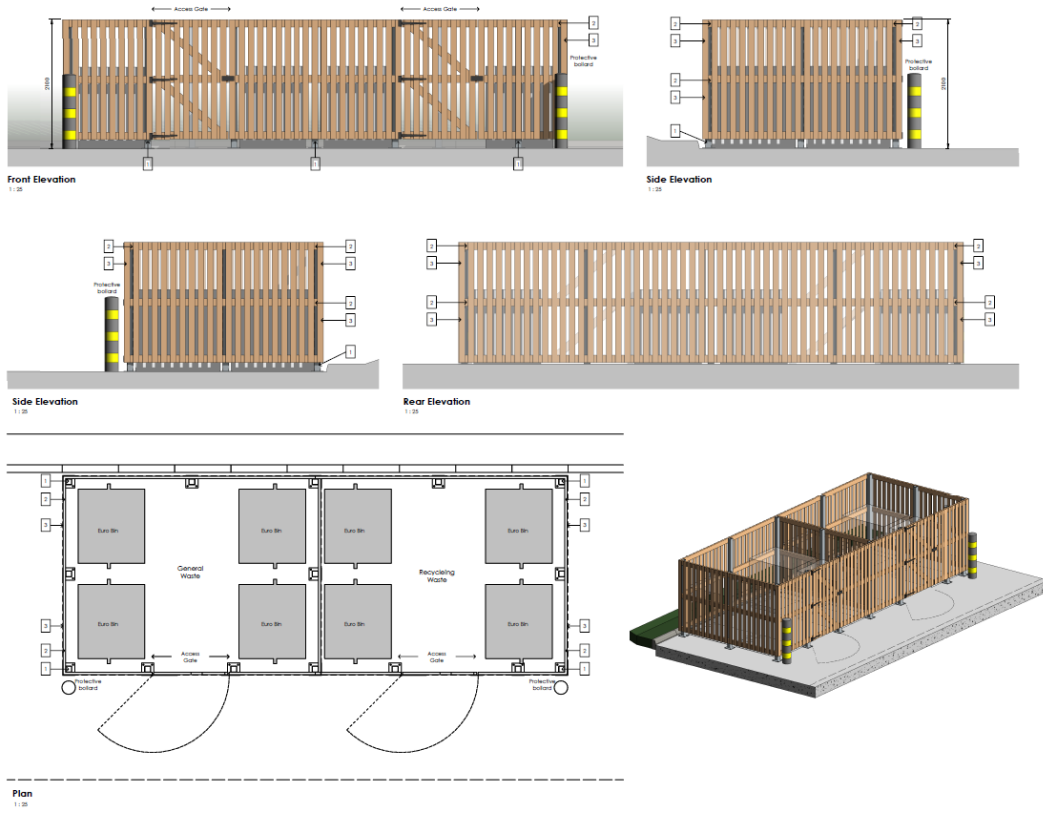
Plan

1:50



Perspective Veiw

Proposed Bin Store Drawings



Proposed Cycle Store Drawings

