



MAY 2025

Erewash Borough Council Core Strategy Review

Representations on Core Strategy Review Amendment
(March 2025)

Iceni Projects Limited on behalf of
GLP

May 2025

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ON BEHALF OF GLP

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Erewash Borough Council Core
Strategy Review

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1. INTRODUCTION

- 1.1 On behalf of our client, GLP, we hereby provide our comments on the Core Strategy Review Amendment and supporting evidence documents, published by Erewash Borough Council for consultation on 7 April 2025.
- 1.2 Our client has a commercial interest in the land to the southwest of Junction 25 of the M1, as identified in the enclosed plan at Appendix 1. Our previous representations have highlighted the suitability of the site for development, in the context of a significant and unmet need for strategic logistics development.
- 1.3 We note that this current consultation responds to a number of issues identified by the Inspector following the initial hearings in 2024, including the need for a systematic Green Belt Review and further Sustainability Appraisal of reasonable alternatives.
- 1.4 Alongside this, the Council will be aware that GLP have been progressing the technical work in support of the proposed development of the land southwest of Junction 25, as detailed in the pre-application submission in October 2024 and discussed in the subsequent meeting in January 2025. This has demonstrated the suitability of the site in relation to issues such as highways/ access, flood risk and drainage. A technical note summarising the latest discussions regarding highways and access is included at Appendix 2 for reference. Unfortunately Erewash Borough Council has not provided its formal pre-application response at the time of writing, following the meeting in January, however GLP remain keen to work collaboratively with the Council.
- 1.5 In this context, we provide below our comments on the Council's proposed updated Core Strategy Review and the supporting evidence base documents.

2. REPRESENTATIONS ON THE CORE STRATEGY REVIEW AMENDMENT

- 2.1 GLP object to the Core Strategy Review Amendment (March 2025), on the basis that it does not include any proposed amendments to the employment strategy as set out in Strategic Policy 2, and therefore our previous objections on the grounds of soundness have not been addressed.
- 2.2 We note that the additional and updated evidence base documents included in the current consultation seek to retrospectively justify the proposed approach originally set out in the submitted Plan. We provide our comments on the relevant documents below.

Erewash Strategic Logistics Update Report (March 2025)

- 2.3 Erewash Borough Council has produced an 'update report', setting out its latest position regarding employment needs and seeking to critique its existing evidence base regarding strategic logistics.
- 2.4 In the first instance, we highlight that this was not raised by the Inspector in her initial findings (September 2024 – INS09) or subsequent correspondence (INS10) as an issue that required further evidence to address her soundness concerns. Additionally, this was not a document that the Council identified in its workplan submitted to the Inspector (EBC17). This document was also not taken to the Extraordinary Council Meeting on 27 March 2025 as part of the pack of proposed consultation documents.
- 2.5 Furthermore, the Council did not raise any concerns regarding its employment evidence before publishing the March 2025 report, and it is not clear what has changed between the Hearings in 2024 and March 2025 to result in this change of position.
- 2.6 Taking into account the above, we question the status of this Council statement and whether it can be accepted as an additional evidence base document at this stage of the Examination process.
- 2.7 Notwithstanding, should the Inspector be minded to give weight to this document, we provide our comments in response. A detailed response to each of the points raised in the Council's note is included at Appendix 3, with key matters set out below.

Duty to Cooperate and Relationship to Wider Greater Nottingham HMA

- 2.8 Erewash Borough Council submitted its Local Plan for examination accompanied by employment evidence which included the 2021 Employment Land Needs Study (EBE1) and the 2022 Nottinghamshire Core & Outer HMA Logistics Study (EBE2). Notwithstanding the fact that the submitted Plan does not take into account the 2022 study's findings and recommendations, in terms

of planning for strategic B8 needs (as discussed at the Local Plan Examination Hearings), the report is part of the evidence base and was jointly commissioned on behalf of Erewash and the other Nottinghamshire HMA authorities.

- 2.9 The Greater Nottingham Strategic Plan (recently subject to a second Regulation 19 consultation) also uses the 2022 Nottinghamshire Core & Outer HMA Logistics Study as part of its evidence base, reflecting the joint nature of the evidence base. The March 2025 Employment Background Paper published by the Greater Nottingham Strategic Plan authorities as part of the recent Regulation 19 consultation continues to use the 2022 study as the basis of that Plan's approach to identifying strategic B8 needs, with the Background Paper presenting an update on the supply position against identified needs. The Greater Nottingham Strategic Plan is therefore proceeding on the basis of the 2022 study's evidence.
- 2.10 The position now adopted by Erewash Borough Council, seeking to critique and undermine its own joint evidence base, raises questions regarding the cooperation between the different Nottinghamshire HMA authorities. Erewash are now seeking to unilaterally diverge from the evidence and joint approach previously adopted by the authorities within the HMA.
- 2.11 This in turn indicates a lack of effective ongoing cooperation between the authorities in terms of how the identified strategic B8 needs will be met across the HMA as a whole. Based on the Greater Nottingham authorities' own calculations (see paragraph 9.8 of the 2025 Employment Background Paper¹), there is 78-94 ha of unmet need arising within the HMA, taking account of the proposed allocation of the Bennerley Coal Disposal Point in the Greater Nottingham Strategic Plan. Iceni's assessment is that this unmet need is even greater, as discussed in Appendix 3. If Erewash Borough Council are now seeking to refute the existence of this unmet need, identified by the Greater Nottingham authorities, this clearly indicates a lack of effective cooperation and strategic planning to deal with the residual unmet need identified by the independent joint evidence base.
- 2.12 As discussed in our previous representations, we consider that Erewash should be making a meaningful contribution towards meeting this identified need, and consequently will need to allocate additional land for strategic B8 development, in order to make the Plan positively prepared.
- 2.13 We summarise below the key points in relation to the substantive issues raised in the Council's note, as discussed in detail in the note prepared by Iceni's Economics team at Appendix 3.

¹ <https://www.gnplan.org.uk/media/d2ejekly/employment-background-paper-publication-draft-march-2025.pdf>

Underlying Demand

- 2.14 As detailed in the note at Appendix 3, there is significant demand for logistics development within the M1 corridor up to Junction 28, as evidenced by detailed property market analysis, with good connectivity to a significant portion of the UK population as well as good access to labour.
- 2.15 In terms of the drivers of logistics demand, the latest ONS data on the proportion of retail sales that take place through e-commerce shows that e-commerce has not plateaued post-COVID and e-commerce has a larger market share than it would have had if the pre-COVID trend had continued. As the e-commerce sector continues to grow, it will continue to drive the demand for logistics premises. Furthermore, other drivers for new logistics premises such as re-shoring, increasing resilience, automation and decarbonisation are also feeding into the overall demand picture.

Market Performance

- 2.16 Rents for prime logistics space in the Midlands have continued to increase steadily over the last few years, albeit at a slower rate than the peak level of increase seen during COVID. At the same time, there has continued to be strong take-up of logistics space in the East Midlands.
- 2.17 While vacancy rates have increased in recent years, additional logistics stock will continue to be needed given the robust demand for new space. The analysis at Appendix 3 finds that continued growth in logistics space needs across the country, combined with the strong competitive position of the East Midlands and the underlying demand drivers highlighted are likely to continue to drive the need for new logistics space in the East Midlands and in the M1 Corridor within the Nottingham HMA.

Quantitative Need and Supply

- 2.18 The assessment provided at Appendix 3 explains how the 1,270,000 – 1,486,000 sqm need figure for strategic logistics within the HMA remains robust and should continue to be considered the 20-year need over the modelled period.
- 2.19 Historic completions and net absorptions in the study area were suppressed by the significant supply-side constraints including those posed by the Green Belt located around the M1 junctions in the Nottingham HMA, and therefore the Completions annualised and Net absorption scenarios are not an accurate representation of likely future market need. Meanwhile the significant need to replace ageing stock results in the TGRD High as the preferred TGRD scenario.
- 2.20 In addition, to allow for an appropriate vacancy rate, a buffer of 5-10% would be considered the minimum appropriate. It is still therefore considered appropriate to plan for 1,270,000 – 1,486,000 sqm of strategic logistics floorspace over the study period, in line with the NCOHLS.
- 2.21 Against this identified need, a number of the sites identified within Erewash Borough Council's latest supply position should be discounted for the reasons discussed in the note at Appendix 3. It should

be noted that the Greater Nottingham Strategic Plan evidence² identified an unmet need of 78-94 ha arising within the HMA, once allocations and commitments are taken into account. It is unclear whether the evidence now presented by Erewash has any form of support from the other HMA authorities or whether this now undermines the evidence supporting the recent Regulation 19 version of the Greater Nottingham Strategic Plan. Notwithstanding, Icení's analysis of Erewash's latest position indicates there is a residual unmet need of 97-216 ha.

- 2.22 This constitutes a significant remaining unmet need within the HMA, which Erewash is particularly well suited to help address, with Junction 25 of the M1 being the most suitable location to accommodate strategic logistics development. This evidence of need must be taken into account in order for the Core Strategy Review to be positively prepared and justified. Accordingly, we maintain our objection on soundness grounds to Strategic Policy 2 and the employment strategy set out within the Plan.

Green Belt Review (January 2025)

- 2.23 In response to the Inspector's concerns that no comprehensive review of the Green Belt had been undertaken to support the Plan, and no Exceptional Circumstances have been identified to release land from the Green Belt, the Council has published a Green Belt Review (January 2025), with supporting Methodology (November 2024).
- 2.24 Icení's specialist Landscape team have reviewed these documents, and provide detailed comments in their representations included at Appendix 4.
- 2.25 We are concerned that the Green Belt review undertaken by the Council is significantly flawed and does not provide an appropriate basis for informing policy decisions regarding the release of Green Belt.
- 2.26 As discussed in the note at Appendix 4, a Green Belt Review should involve more than one stage, including an initial assessment of contribution of specific Green Belt parcels, followed by a review of which parts of the Green Belt could be released to accommodate development. The Council's 'Review' essentially presents an assessment of areas of Green Belt, with no further consideration as to how this influences the policy decisions regarding the release of particular Green Belt sites.
- 2.27 Furthermore, the Council's assessment methodology is significantly flawed, and does not provide a comprehensive or systematic review. Large parts of the borough's Green Belt are omitted from the assessment in relation to purposes a and b, and the assessment parcels are too broad and

² <https://www.gnplan.org.uk/media/d2ejekly/employment-background-paper-publication-draft-march-2025.pdf>

inappropriately defined. Consequently, as explained in the accompanying note at Appendix 4, the assessment is wholly inconsistent with the Planning Practice Guidance relating to Green Belt Reviews.

- 2.28 Significantly, the Council's assessment does not have a clearly defined scoring system to assess the contribution that subject parcels make towards the relevant purposes of Green Belt. The vague narrative statements provided in the report do not provide a systematic assessment as required by the PPG and in accordance with industry standards.
- 2.29 Overall, the assessment does not provide any judgements on Green Belt contribution or come to a clear conclusion on areas where the Green Belt boundary should be reviewed. The conclusion is limited to a map which indicates whether land 'fulfils' all three functions, or whether it fulfils one or two functions. The methodology and report do not clarify what 'fulfil' means, and there is no assessment of the level of contribution as required by the PPG.
- 2.30 Given the wholly inadequate nature of the Green Belt Review, we therefore do not consider that it provides a sound basis on which to inform the Plan. Accordingly, the Core Strategy Review cannot be considered sound, as it is not justified.
- 2.31 We consider that it will be necessary for the Green Belt evidence to be reformulated, with an appropriate review undertaken in accordance with the Planning Practice Guidance and industry best practice. This is necessary in order to provide a suitable and proportionate evidence base to inform the Plan, and ensure the strategy is sound.
- 2.32 Furthermore, any future Green Belt Review should take account of the points made in the note at Appendix 4 regarding the suitability of the land at Junction 25 of the M1 to be released to meet identified employment needs. We note that the Council did not take account of the Landscape, Visual and Green Belt Appraisal prepared on behalf of GLP in relation to this site, and shared with officers in October 2024, however we trust that the relevant evidence will be taken into account in any future work.
- 2.33 In addition, the Council has not provided any evidence regarding Exceptional Circumstances to justify release of the Green Belt in accordance with paragraphs 140-141 of the NPPF (2021). We consider that such Exceptional Circumstances exist in relation to strategic logistics development, given the significant unmet need for such development as described above, and the lack of available non-Green Belt sites to suitably accommodate it. However no evidence has been provided by the Council on the matter of Exceptional Circumstances, in relation to any proposed land use, to confirm the acceptability of the principle of releasing Green Belt. Accordingly, we consider that this evidence will need to be produced in order to ensure the Plan is consistent with national policy and justified, and therefore sound.

Sustainability Appraisal (March 2025 Update)

- 2.34 Following the Hearings in 2024, the Inspector raised concerns regarding the Council's assessment of the reasonable alternatives for the employment strategy (as detailed in INS09), noting that the land at Junction 25 of the M1 had not been assessed within the SA, whilst other alternatives had been.
- 2.35 In response, we note that the March 2025 Update of the SA includes an option (Option 5) which assesses the potential allocation of land adjacent to Junction 25 of the M1/ north of Longmoor Lane. This is compared to the other potential options including the preferred option to allocate the Stanton Regeneration Site (Option 2).
- 2.36 GLP's position (as discussed in our previous representations) is that Stanton North will serve a local need rather than contributing towards the strategic logistics need. Notwithstanding, even if Stanton was considered to have some potential to deliver strategic B8 development, it would not be sufficient to meet the identified needs discussed above. Accordingly, we do not consider that it is appropriate to assess the two sites as separate options, as it will be necessary to allocate a site the size of the land at Junction 25 in addition to the Stanton North site. As such, we do not consider that the SA's selection of options is appropriate, as it should take account of the full scale of need for strategic B8 and assess an option which includes Stanton North and the land at Junction 25, which would represent a scenario which comes closer to meeting the identified needs for strategic logistics.
- 2.37 We also have concerns regarding the scoring of the respective options, which we do not consider is reasonable or justified. Table 5 of the SA Update Report summarises the conclusion matrix for the different options, finding that Option 2 scores the most positively (+25) whereas Option 5 scores most negatively (-22). We do not consider this assessment to be rational.
- 2.38 As discussed in our previous representations and at the Hearings, we consider that Option 2 is assessed in an unduly positive manner, given this option does not seek to meet identified needs for strategic B8 development. The assessment of Option 2 is unchanged from the submitted SA and therefore our objections still remain on this basis.
- 2.39 In addition, we consider that the assessment of Option 5 is unjustifiably negative. The option only scores a 'minor positive' in relation to improving the diversity and quality of jobs, on the basis that only B8 logistics development is proposed, thereby limiting the employment opportunities available. We consider this to be an unreasonable assessment given the scale of the site will allow for large scale units incorporating a range of different roles within the logistics sector. Furthermore, the lack of any other strategic logistics allocations proposed in the Local Plan means this option would enhance the diversity of job opportunities significantly compared to other options, which would not enable strategic logistics development to come forward.

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- 2.40 As explained in the accompanying Economics note at Appendix 3, the logistics industry employs people at a wide variety of occupation and skill levels, with average pay in the sector above the national average for all jobs. 2019 research by the Freight Transport Association shows 9.9% of jobs being held by managers and directors, with significant numbers of additional professional jobs³. The British Property Federation has found substantial recent growth in professional, associate professional and technical jobs in the logistics sector⁴. These trends are likely to continue in the future as new technologies and changes in the logistics sector continue to increase the number of highly skilled jobs. Therefore strategic logistics development has the potential to provide needed jobs at a wide range of skill levels. It would also support broader economic growth, given the vital role of the logistics sector in supply chains across the economy.
- 2.41 Furthermore, we do not agree with the ‘minor positive’ score against the objective to reduce unemployment, which the SA suggests is due to the option only delivering a small number of new jobs in the south of Erewash. The land at Junction 25 could deliver at least 1,400 jobs, in addition to construction and supply chain benefits, which would be a significant boost to employment opportunities for the borough as a whole.
- 2.42 We also do not consider that a ‘neutral’ score can be justified in relation to the objective to provide land and buildings of a type required by businesses. Given the evidence of need for strategic B8 development, the land at Junction 25 would clearly make a significant contribution towards delivering the land and buildings required by businesses.
- 2.43 In terms of other ratings, the ‘major negative’ rating in relation to community safety is based on an unfounded assumption that logistics uses will inevitably increase criminality in the area, which is not justified. A modern logistics park will have various security measures in-built to mitigate such risks, and this has not been accounted for in the assessment.
- 2.44 Meanwhile the ‘major negative’ rating in relation to transport is also unduly negative in terms of the land at Junction 25. Development of the site would seek to maximise sustainable modes of transport from the outset and its location in close proximity to Long Eaton will allow it to build on existing infrastructure, as detailed in Appendix 2. Meanwhile Derbyshire Highways have confirmed the acceptability of access from Longmoor Lane, and National Highways have also not raised any significant concerns.
- 2.45 Details of the trip generation were included in the Transport Scoping Note issued to Erewash Borough Council and Derbyshire Highways in 2024, and provided in the note at Appendix 2. This

³ Freight Transport Association 2019, *Logistics Skills Report*

⁴ BPF 2022 *Levelling up – The Logic of Logistics*

highlights that a strategic distribution use would generate a total of approximately 85 AM peak hour arrivals, equating to approximately 21 vehicles per hour (1 vehicle every 3 minutes) on each approach to the Sandiacre Interchange. A further 38 departing vehicles per hour would result in 10 vehicles per hour (1 vehicle every 6 minutes) on each approach. Of these, approximately 1 vehicle every 10 minutes on each approach would be an HGV. The PM peak would see lower vehicle flows than the AM peak. As a result, the initial transport assessment work summarised at Appendix 2 concludes that the proposed development is not expected to have any material effects on the highway network. Accordingly, the SA's assessment is not reasonable or justified when it refers to a substantial number of HGVs and that the existing transport infrastructure would not be sufficient to adequately serve the site.

- 2.46 We also do not consider the 'major negative' score for flooding and water quality is justified. The Council will be aware that initial engagement has been undertaken with the LLFA as part of the joint pre-application discussions with Council officers, and no significant concerns or objections have been raised in this regard. Point 12 of the SA assessment identifies a -1 rating, apparently on the basis that the details of the drainage strategy are currently unknown. We do not consider this to be a fair assessment given the relevant details will be provided at the application stage, and there is no evidence that the proposals would have a negative impact. Consequently this point should have been given a neutral score.
- 2.47 There are also flaws with the SA's 'major negative' assessment of Option 5 in relation to landscape and built environment. The Landscape, Visual and Green Belt Appraisal prepared by Icen's Landscape team on behalf of GLP, and shared with the Council in October 2024, explains that the landscape effects of developing the land at Junction 25 will be localised, with negligible effects on the character of the wider landscape. The site is located adjacent to a highly developed area and bound on two sides by the M1 and A52. The proposals will be experienced within the context of this busy urban area and therefore effects on the surrounding landscape character will be minor. The Council's assertion that the development would fundamentally alter the character of the area is therefore at odds with the detailed assessment undertaken on behalf of GLP, and is not based on appropriate reasoning or justified.
- 2.48 In terms of visual effects, the Icen assessment notes that from Longmoor Lane, views will be filtered due to thicker vegetation along the road. Where there are gaps in mature vegetation, the southernmost proposed building will be seen emerging through the treeline in views from Longmoor Cemetery, however as the scheme's proposed planting matures, which could include gapping up of the Site's southern boundary, these views will become increasingly filtered. The Council's assessment is thus unduly negative in its assessment of visual effects, which does not include an objective assessment of the potential development taking account of local context. The Council's assessment refers to effects on properties on the northern side of Longmoor Lane, however the properties on the northern side of Longmoor Lane within Breaston are over 250m to the west of the

site and the orientation of the properties means there is no direct visual relationship between these houses and the site.

- 2.49 Taking account of the above points, we conclude that the SA Update is significantly flawed in terms of its option selection and its assessment of alternatives, in particular resulting in an unduly negative assessment of Option 5 which is not justified by the evidence. Accordingly, it does not provide an appropriate or robust basis on which to inform policy decisions regarding the Plan's employment strategy. The Core Strategy Review is therefore not sound, as it is not justified by an appropriate evidence base.

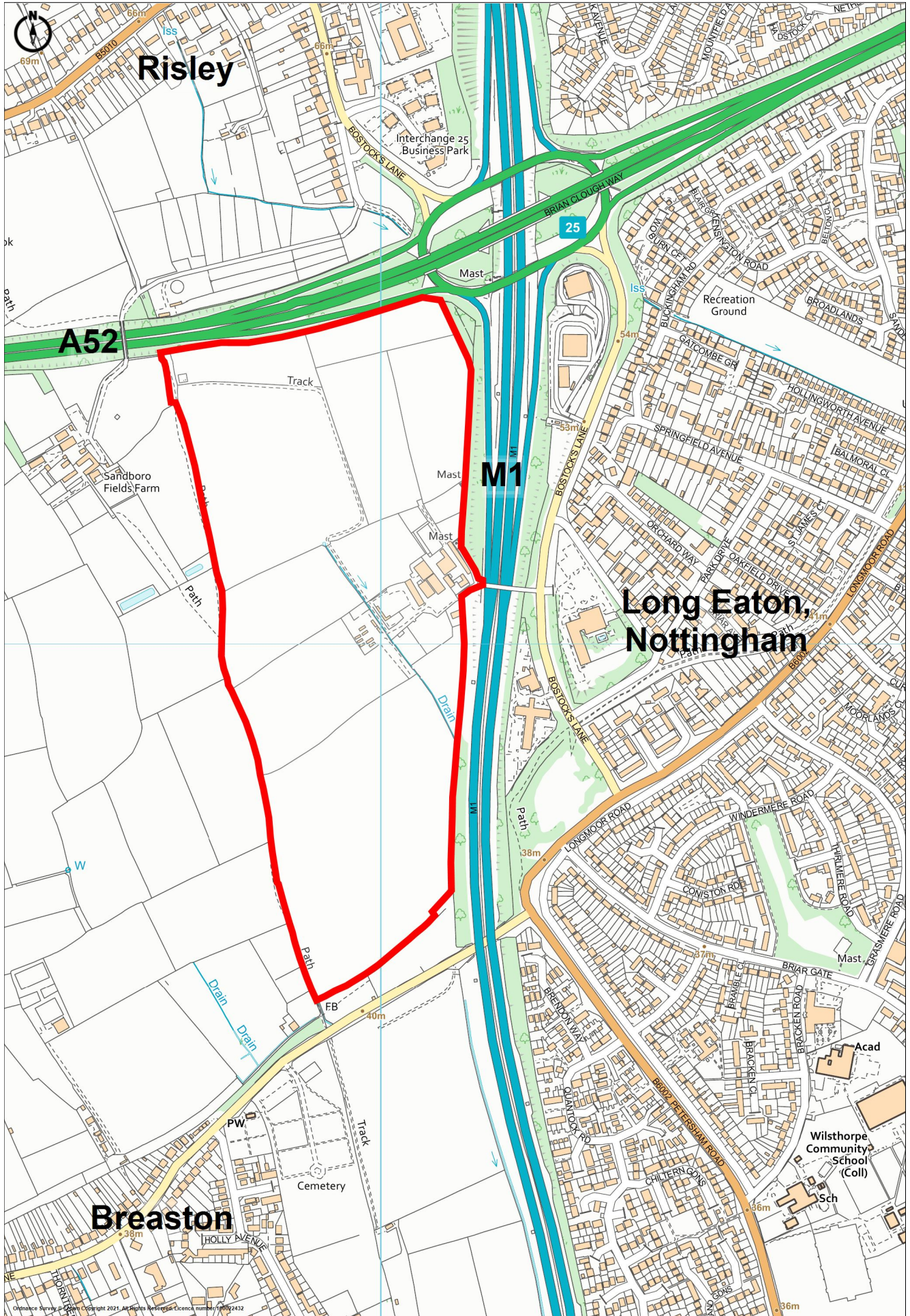
Summary

- 2.50 Drawing together the above, we have identified significant flaws with the Council's updated evidence base documents which are currently the subject of this consultation. This includes the Strategic Logistics Update Report, which now seeks to undermine the joint evidence base but which for the reasons discussed above cannot be considered a reasonable analysis of the need for strategic logistics. Furthermore the Green Belt Review undertaken by the Council does not form an appropriate basis for making informed policy decisions and significantly fails to comply with relevant Government guidance and best practice. Meanwhile the update to the Sustainability Appraisal also fails to identify appropriate options for assessment in the context of the significant strategic logistics need, and its assessment of Option 5 in particular is not consistent with relevant facts and objective considerations.
- 2.51 Taking account of these issues, we do not consider that these documents form an appropriate basis for informing the Core Strategy Review and therefore the Plan is not justified. The Plan is therefore unsound, and will significantly fail to positively respond to the evidence of significant need for strategic logistics development.
- 2.52 In order to make the Plan sound, the Council's evidence base should be updated to address the issues raised above, and additional land should be allocated to help meet the identified need for strategic logistics development. Strategic Policy 2 will need to be updated on this basis. In this context, the land at Junction 25 of the M1 presents a significant opportunity to positively plan for growth and help meet these needs.

3. SUMMARY AND CONCLUSIONS

- 3.1 This document sets out our comments on the on the Core Strategy Review Amendment and supporting evidence documents, on behalf of GLP.
- 3.2 In particular, we have reiterated our objections to Strategic Policy 2 and the latest evidence documents including the Strategic Logistics Update Report, Green Belt Review and Sustainability Appraisal Update.
- 3.3 We have identified various issues with the documents relating to employment need, Green Belt and assessment of reasonable alternatives, and on that basis the Plan cannot in our view be considered sound, as it is not justified by appropriate evidence. The failure to make a meaningful contribution towards identified strategic logistics needs also results in the Plan not being positively prepared.
- 3.4 In order to make the Plan sound, we consider that the deficiencies in the evidence base will need to be addressed, with additional land allocated to meet identified needs for strategic logistics.
- 3.5 We trust the Council will take these points into account at this stage, and we would welcome the opportunity to work collaboratively with the Council to address the soundness issues identified. Should these objections remain unresolved following the current consultation, we respectfully request that GLP are given the opportunity to discuss these matters further at any future Examination Hearing Sessions.

A1. LOCATION PLAN



A2. ACCESS ARRANGEMENTS AND TRANSPORT ASSESSMENT SCOPING NOTE

POTENTIAL EMPLOYMENT DEVELOPMENT
BOSTOCKS LANE
EREWASH

ACCESS ARRANGEMENTS AND TRANSPORT
ASSESSMENT SCOPING NOTE

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Appendices

Appendix A – Trics Database Output

Appendix B – Drawing 8118-MJM-XX-XX-SK-D-6650

Appendix C – Comments on Original Allocation Application Response

1 Introduction

A site on the southwest corner of the Sandiacre Interchange (junction 25 of the M1 and A52) in Erewash has been identified for employment development as shown in Figure 1.1 below.



Figure 1.1: Proposed Development Site

The site is to be promoted in the current Erewash Local Plan review.

Currently, access to the site is taken from Bostocks Lane via a bridge over the M1. This access serves the existing uses on the site, which comprise farmland, agricultural buildings and two residential dwellings. The overbridge, we understand, is a National Highways asset.

A preliminary structural assessment of the bridge has been complete, and this concludes that the existing access would be unsuitable for HGV traffic generated by the employment development being considered

and would also prevent the site from taking advantage of the excellent highway connections to all four points of the compass which exist adjacent to the site.

Upon issue of the initial Masterplan for the site in support of the allocation in the Local Plan, the local Planning Authority had concerns that the proposed access arrangements had not been agreed with the Local and National Highway Authorities. There were also proposals to reinstate the canal adjacent to the southern boundary of the site, which would need to be considered in the access strategy.

The first version of this Access Options and Scoping Note was produced and issued to the Local and National Highway Authorities and the Derby and Sandiacre Canal Trust. Responses from all organisations have now been received and an access strategy which would be acceptable to all consulted parties has been agreed.

This version of the Access Options and Scoping Note therefore sets out the access arrangements to which all relevant authorities have confirmed they have no objections.

At the planning application stage (should this be reached) the development will be supported by a full Transport Assessment. The development would operate a Travel Plan, although it is likely that some of the ultimate occupiers will be national companies that operate their own, company-wide, Plans.

To put the scale of the development into perspective, the potential traffic generation and distribution of Heavy and Light vehicles has been considered.

The accessibility of the site by different modes of transport has also been considered to enable this Note to cover all aspects which may be of interest to the Planning Authority when considering site allocations.

2 Existing Access Arrangements

Currently, access to the site is taken from Bostocks Lane via the bridge over the M1. The overbridge measures approximately 3.2m in width and is currently only capable of accommodating one-way vehicular movements at any particular time.

There is no weight restriction on the bridge. It has, however, been the subject of a preliminary assessment which concluded that it could not be recommended for use as a main vehicular access for the proposed development. It may, however, provide a very good means of access into the centre of the site for pedestrians and cyclists.

3 Traffic Generation Potential of Employment Uses

At this stage it is envisaged that the total development would provide in the region of 1,310,000 ft² or 131,000 m² floor space. For traffic generation purposes it has been assumed that all units would operate as Warehouse Units. As a sensitivity test it has also been assumed that 33% of the floor area could be used for manufacturing purposes with the remaining 67% used for Warehouse use.

In their response to the original Access Options note National Highways have suggested a further sensitivity test be undertaken at the Transportation Assessment stage. This will be provided at that stage, but as the traffic generation will be similar this will not change any conclusions / recommendations in this report.

The traffic generation potential of the development has been assessed using trip rates extracted from the Trics database. Sites throughout the UK excluding Greater London and Ireland have been searched. The Trics output is reproduced in Appendix A

On the basis of a strategic warehouse use, the total 131,000 m² floor area could be expected to generate the traffic flows below:

Table 3.1: Trip Rates and Traffic Generation. Envisaged Strategic Warehouse Use

Time	Total Vehicles				Heavy Vehicles			
	Arrivals		Departures		Arrivals		Departures	
	Trip Rate	Trips	Trip Rate	Trips	Trip Rate	Trips	Trip Rate	Trips
08:00-09:00	0.065	85	0.029	38	0.020	26	0.017	22
17:00-18:00	0.038	50	0.050	66	0.020	26	0.013	17

On the basis of a strategic warehouse use in 67% of the floor area (87,000 sq m) and Light Manufacturing in 33% of the floor area (44,000 sq m) the development could be expected to generate the traffic flows below:

Table 3.2: Trip Rates and Traffic Generation. Strategic Warehouse and Light Manufacturing Use

Time	Total Vehicles				Heavy Vehicles			
	Arrivals		Departures		Arrivals		Departures	
	Trip Rate	Trips	Trip Rate	Trips	Trip Rate	Trips	Trip Rate	Trips
Warehouse								
08:00-09:00	0.065	57	0.029	25	0.020	17	0.017	15
17:00-18:00	0.038	33	0.050	44	0.020	17	0.013	11
Manufacturing								
08:00-09:00	0.119	52	0.028	12	0.016	7	0.009	4
17:00-18:00	0.144	63	0.125	55	0.003	1	0.000	0
Total								
08:00-09:00		109		37		24		19
17:00-18:00		96		99		18		11

With the envisaged Strategic Warehouse use, the 85 am peak hour arrivals would arrive from either direction on the M1 and A52. Assuming an approximate equal split this would equate to around 21 vehicles per hour (or on average 1 vehicle every 3 minutes) on each approach to the Sandiacre Interchange. The less than 40 departures would equate to 10 vehicles per hour (or one vehicle every 6 min) on each approach. National Highways have recommended that a detailed distribution pattern be derived in the Transportation Assessment. This will be provided at that stage but any increase in traffic on a particular approach direction will be matched by a corresponding reduction on the other directions. Therefore, the average effects would still be the same.

The heavy vehicles would average at one every 10 minutes on each approach.

In the pm peak hour the Strategic Warehouse would generate less than 1 vehicle every 4 minutes arriving and just over 1 vehicle every 4 minutes departing on each approach.

The heavy vehicles would average at one every 10 – 14 minutes on each approach.

The sensitivity test with a manufacturing use in 33% of the floor area shows a slight increase in total vehicles and a reduction in Heavy vehicles. Spread over the 4 approaches to the interchange the effects would not be materially greater than the envisaged Strategic Warehouse use.

Whilst the effects on the Sandiacre Interchange would be fully assessed in the Transport Assessment, at this stage the development is not expected to have any material effects on the highway network (see possibly Bostocks Lane / Longmoor Road junction below).

4 Access Arrangements

Whilst the traffic likely to be generated by the development is not major, the existing site access from Bostocks Lane, over the existing bridge, would not be suitable as noted above.

A number of options were originally considered. With due consideration to the advice received from the respective highway authorities, the access strategy below has been developed and agreed with the authorities. The access strategy is shown on Figure 4.1 below.

4.1 Vehicle Access

The initial feasibility assessment involved a vehicle ingress direct from the Sandiacre Interchange. This junction is under the control of National Highways. National Highways would require further very detailed assessment work undertaking before this could be considered, but it is noted that this would be a free-flow exit from the roundabout with no issues relating to capacity or turning across opposing traffic and would result in no additional traffic entering the roundabout and affecting capacity. National Highways have a detailed simulation traffic model of the roundabout and use of this model was generously offered. Whilst this ingress option to the site may be investigated again at the planning application stage, for the allocation process we have focussed on an access strategy that does not involve this ingress.

As outlined above, it would not be feasible to upgrade the existing bridge over the M1.

The pre-application discussions have therefore focussed on vehicle access being taken from Longmore Lane on the southern boundary of the site. The arrangement would take the form of the sketch design shown in Figure 4.2 below and shown in greater detail including a likely arrangement for the proposed canal works on Drawing 8118-MJM-XX-XX-SK-D-6650, a copy of which is reproduced in Appendix B of this report.

There is a weight restriction on Longmoor Lane to prevent HGV's passing through Breaston to the west of the site.

This would be relocated to west of the access road with the weight restriction signs at the Longmoor Road junction changed to Weight Restriction Ahead signs. Any HGV not associated with the development that entered Longmoor Lane by mistake could turn around using the roundabout.



Figure 4.1: Access Strategy

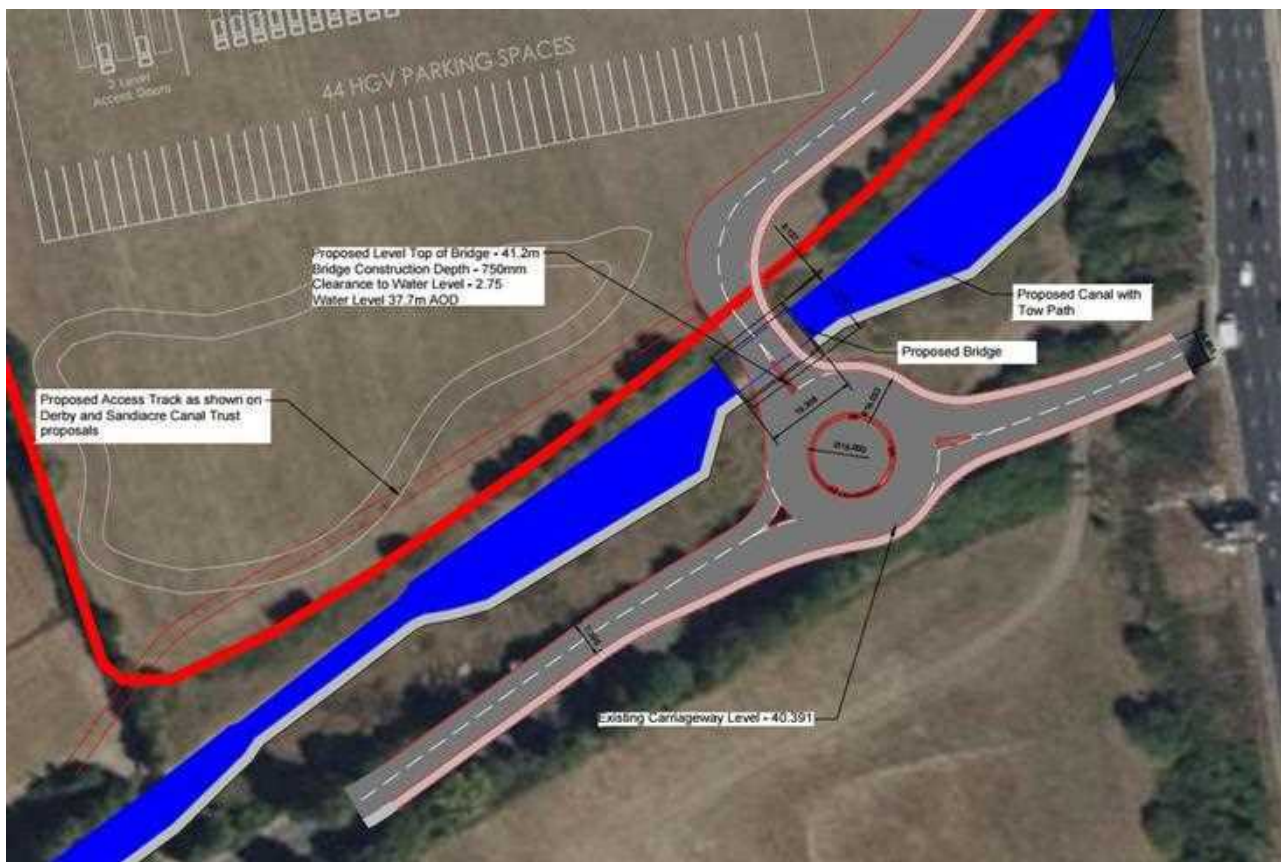


Figure 4.2: Site Vehicle Access Arrangements

This arrangement would utilise the B6002 Longmoor Road which passes along the boundary of Long Eaton to reach the Sandiacre Interchange. Over most of the length to the Sandiacre Interchange, existing development is set well back from the highway.

The Bostocks Road / Longmoor Road junction is known to be operating at its practical capacity at the present time. As part of the development, it is envisaged that this will be improved. This will solve the existing problems for the benefits of highway users and residents of this area. A preliminary arrangement is shown in Figure 4.3 below.

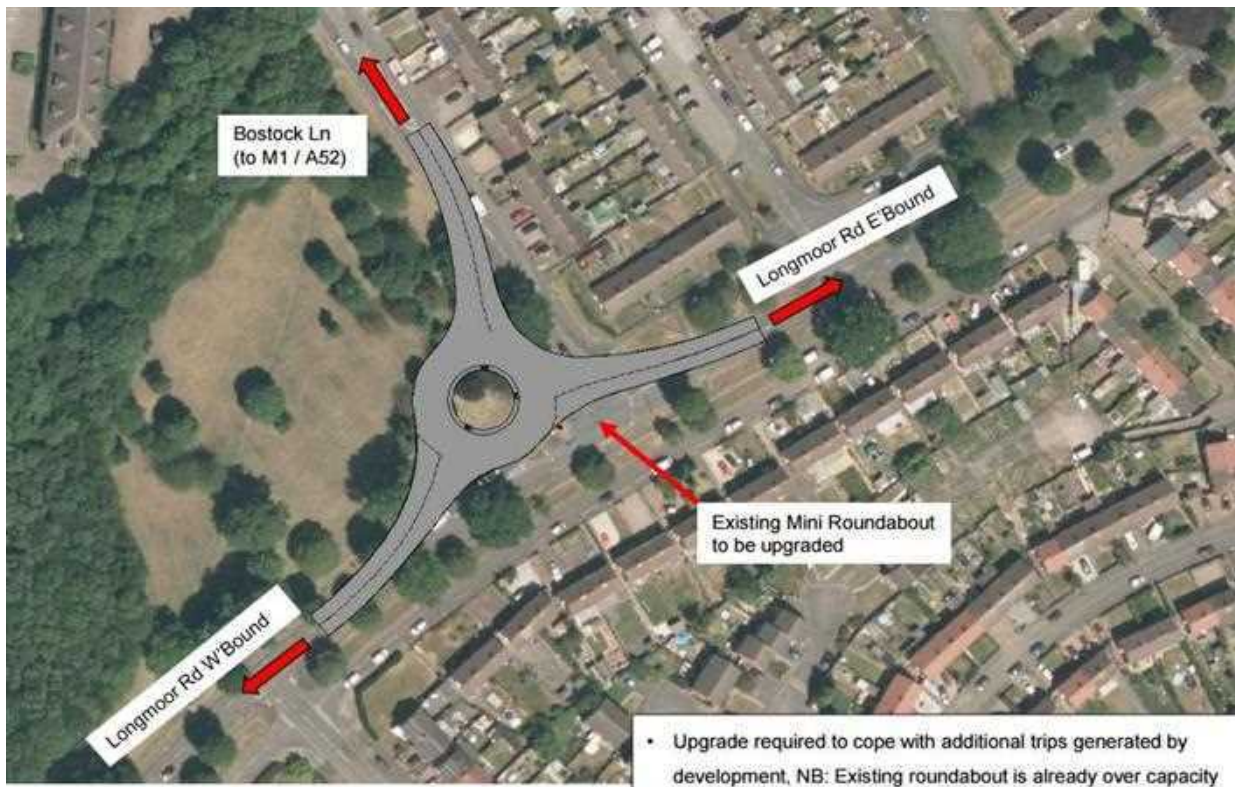


Figure 4.3: Bostock Lane / Longmoor Road Preliminary Improvement

4.2 Pedestrian / Cycle Access

As outlined above, the existing bridge over the M1 will provide a very good pedestrian and cycle access into the centre of the site.

For any pedestrians and cyclists arriving / departing from / to the south the main site access onto Longmoor Lane will provide a shared pedestrian / cycleway into the site.

5 Responses from Consulted Parties

5.1 Local Highway Authority

The local Highway Authority have confirmed that the proposed vehicle access strategy would be acceptable (subject to detailed design) by email as detailed below:

From: Paul Bigg (Place) <Paul.Bigg@derbyshire.gov.uk>

Sent: 13 March 2025 13:42

Subject: RE: Land SW Junction 25 M1 (Bostocks Lane), Erewash Preapplication Meeting

I would be happy with the use of Longmoor Lane as the main site access/egress to the site subject to an agreed access design and any off other site highway improvements that may be necessary to mitigate the impact of the development traffic.

The relocation of the weight restriction would not seem to cause any issues. A roundabout access junction would seem appropriate to enable non site HGVs to turn round rather than having to enter the site although I would of course be willing to look at other options put forward.

I assume the height of the M1 overbridge is not an issue as there are no height restrictions in place.

Paul Bigg | Engineer – Transport Development Management | paul.bigg@derbyshire.gov.uk
Place | Derbyshire County Council
County Hall, Matlock, Derbyshire, DE4 3AG

5.2 National Highways

National Highways have provided detailed comments on what should be included in the Transport Assessment at the planning stage (which will be provided and have not been listed here) but have confirmed that in principle there are no fundamental concerns:

*From: Brittany Grosvenor <Brittany.Grosvenor@nationalhighways.co.uk>
Sent: 09 April 2025 10:05
To: John Lowe <jl@turnerlowe.co.uk>
Subject: RE: National Highways Response: Proposed Development: J25 M1*

Summary

We acknowledge that the applicant is liaising with the local planning authority regarding the potential for allocating the subject site in the Erewash Local Plan Review. We cannot provide any written support for a proposed site allocation outside any consultation on the Local Plan as this wider context needs to be considered when forming our position. All we can say at this stage is that if site access is proposed via the local highway network, none of the information provided to date raises any fundamental concerns regarding the deliverability of the site, however the site is adjacent to a severely congested part of the SRN and we would anticipate the traffic impact assessment to demonstrate the need for infrastructure improvements.

Brittany Grosvenor, BA (Hons), MSc, MCIOB
Assistant Spatial Planner
Operations Directorate (Midlands) – Nottinghamshire, Derbyshire, Lincolnshire, Rutland, Northamptonshire & North Leicestershire

5.3 Derby and Sandiacre Canal Trust

The Derby and Sandiacre Canal Trust commissioned a report to support the restoration of the original canal into a fully navigable route from the Erewash Canal to the Trent and Mersey Canal thereby creating a cruising ring and reconnecting Derby to the national canal network.

This study assumed that there would be an access into the site for commercial uses from Longmoor Lane as the extract from the study shown in Figure 5.1 below shows:

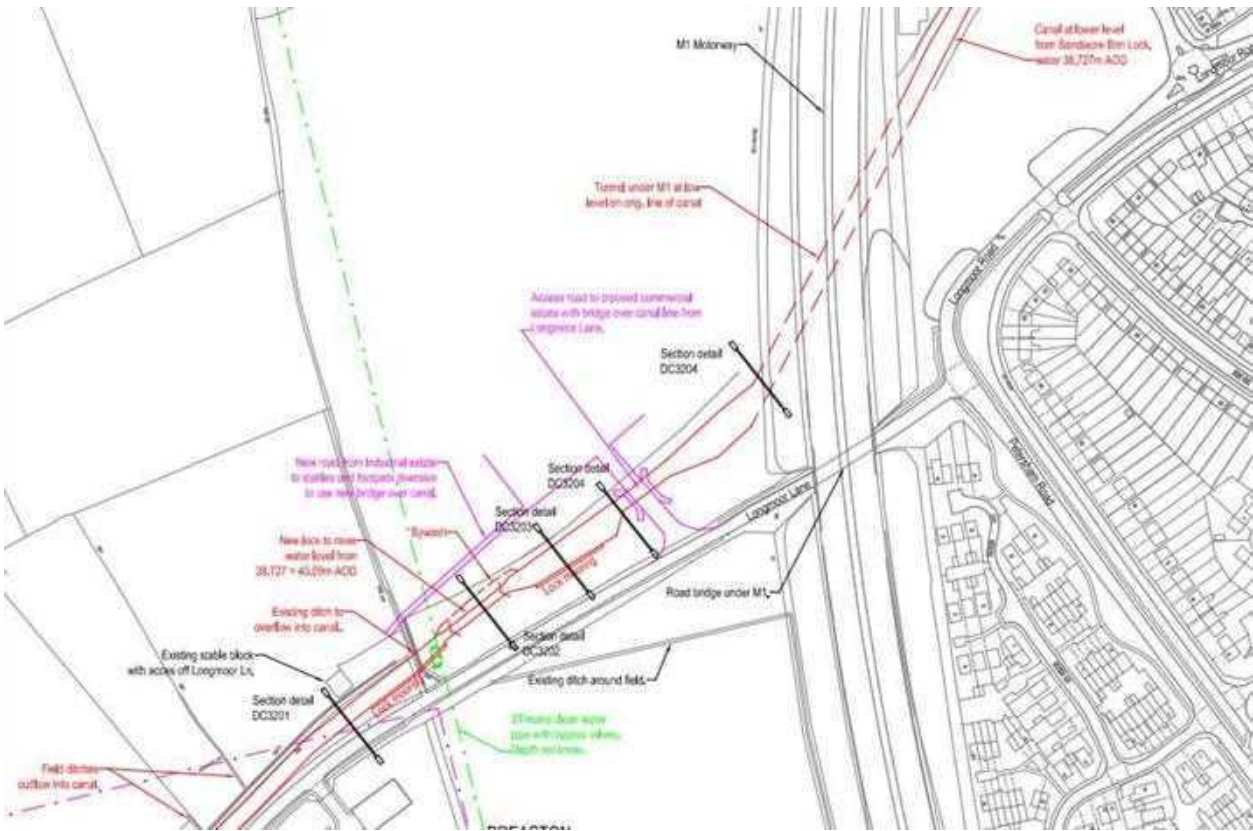


Figure 5.1 Derby and Sandiacre Canal Proposals

The proposed access arrangement on Drawing 8118-MJM-XX-XX-SK-D-6650 in Appendix B is based on the Trust's proposals. The final scheme will be developed in consultation with the Trust and their advisors as the scheme develops.

6 Accessibility by Modes of Transport other than the Car

6.1 On Foot

Assuming the existing bridge is used to access the site, the area within a 10 minute walking distance is as below. As can be seen, a large area of Long Eaton, from where staff could be recruited, would be within easy walking distance.



Figure 6.1 Walking Catchment Area

6.2 By Cycle

Assuming the existing bridge or the possible Longmoor Lane access is used to access the site, the area within a 10 minute cycle distance is as below. As can be seen, a large area of Long Eaton, Stapleford, and Breaston from where staff could be recruited, would be within easy cycling distance.

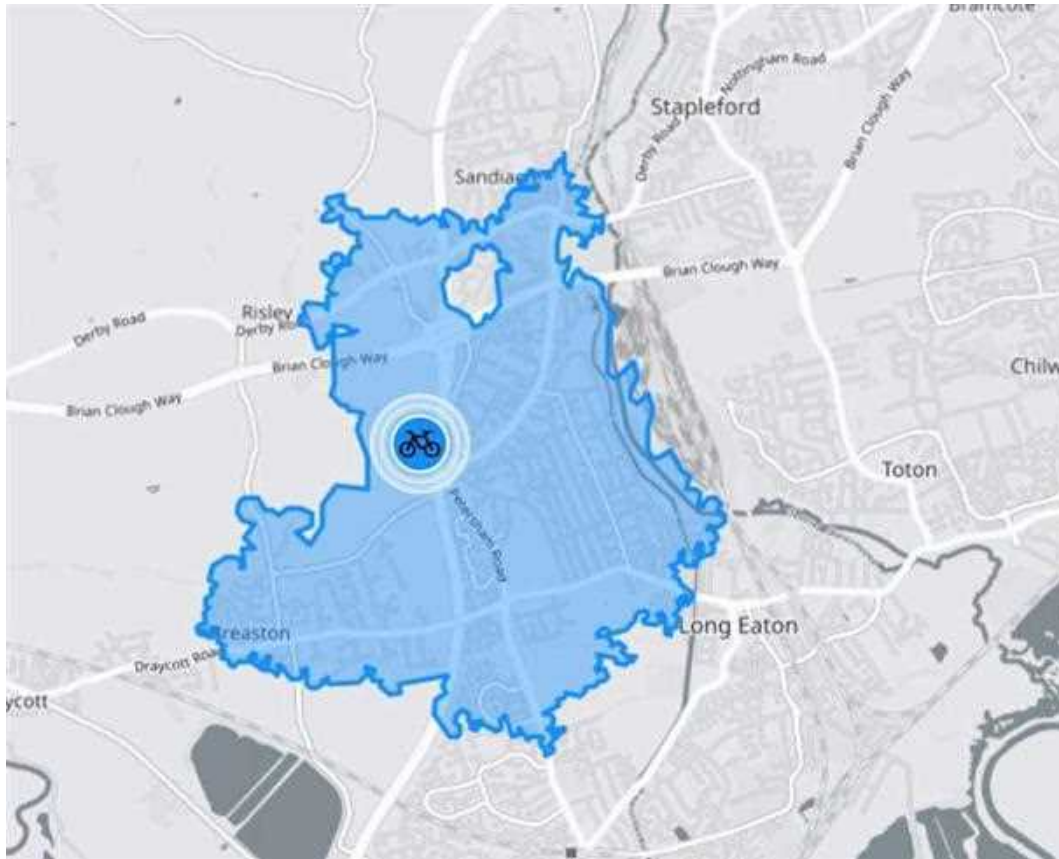


Figure 6.2 Cycle Catchment Area

6.3 By Public Transport

Assuming a 30 min Bus Ride, the area accessible by Public Transport would be as below (Transport Assessment to look at existing Bus Services and Bus Stop locations and facilities).

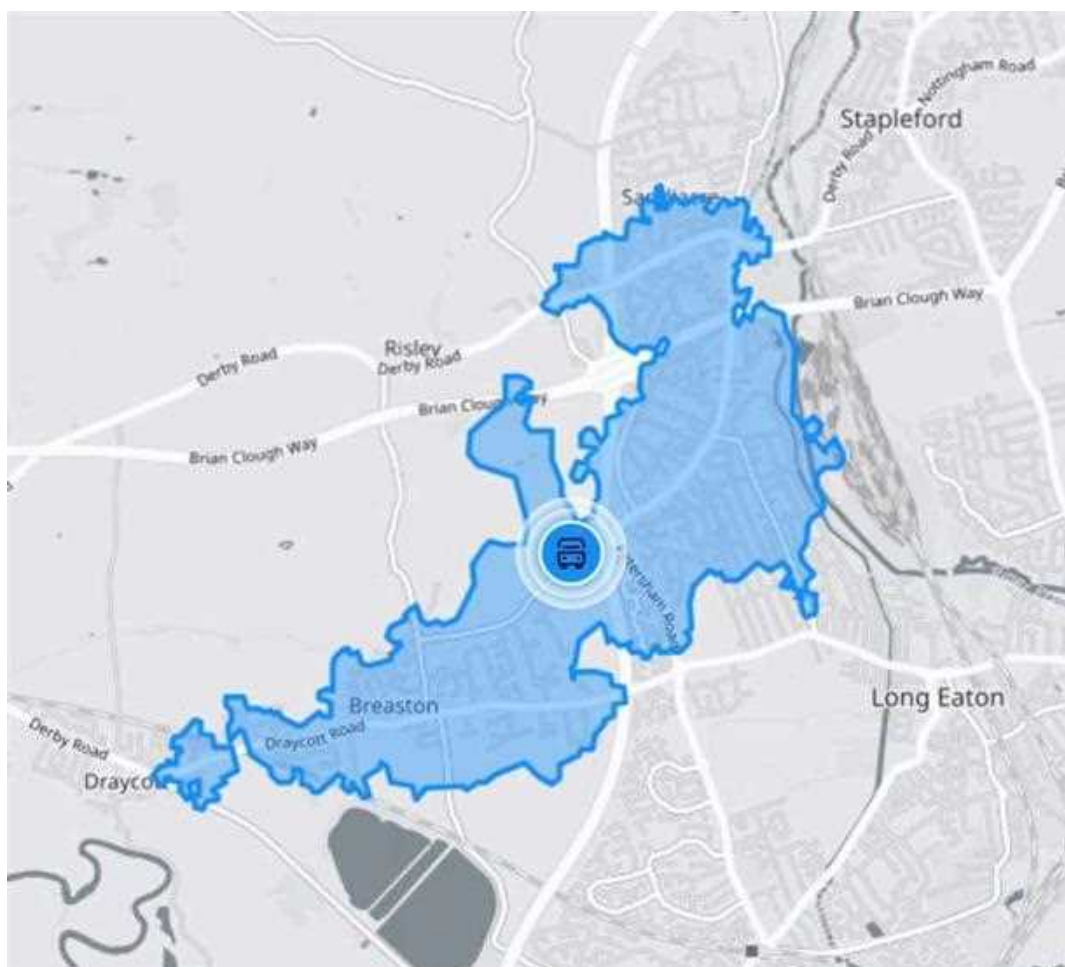


Figure 6.3 Public Transport Catchment Area

The site is clearly accessible by a choice of modes of transport.

7 Other Matters

The Study Area of the Transport Assessment is proposed to be the Sandiacre Interchange, the site access junction onto Longmoor Lane, plus the Longmoor Road / Longmoor Lane junction, which is to be improved.

The Transport Assessment would consider design years 5 and 10 years post the date of the ultimate planning application using base traffic growth in line with the National Trip End Model.

The Transport Assessment will consider recorded Road Traffic Accidents that have occurred in the study area in the last 5 years.

The scope of the Assessment has been agreed with the highway authorities (subject to the inclusion of a further sensitivity test land use as requested by National Highways and detailed above)

8 Response to Planning Authority Comments on Proposed Allocation

The planning authority made comments on the original allocation submission (leading to the discussions with the highway authorities detailed in this updated Note).

The original comments and our response based on the latest information is provided in Appendix C.

All matters have now been addressed.

9 Conclusions

The proposed access arrangements for the proposed development are detailed above. The arrangements have been agreed with the respective highway authorities who have confirmed there is no fundamental objection to the proposals.

The access arrangements incorporate the arrangements proposed by the Derby and Sandiacre Canal Trust and will not have any effect on the restoration of the canal.

It is concluded that there are no highways or transportation reasons for the proposed allocation to be resisted.

Appendix A – Trics Database Output

Calculation Reference: AUDIT-756701-241023-1008

TRIP RATE CALCULATION SELECTION PARAMETERS:

Land Use : 02 - EMPLOYMENT
Category : C - INDUSTRIAL UNIT
TOTAL VEHICLES

Selected regions and areas:

02	SOUTH EAST	
	HF HERTFORDSHIRE	1 days
10	WALES	
	CF CARDIFF	1 days

Turner Lowe Associates Guest Road Manchester

Licence No: 756701

Primary Filtering selection:

Parameter: Gross floor area
Actual Range: 14125 to 17834 (units: sqm)
Range Selected by User: 10000 to 30000 (units: sqm)

Parking Spaces Range: All Surveys Included

Public Transport Provision:

Selection by: Include all surveys

Date Range: 01/01/16 to 08/11/23

Selected survey days:

Wednesday 1 days
Thursday 1 days

Selected survey types:

Manual count 2 days
Directional ATC Count 0 days

Selected Locations:

Suburban Area (PPS6 Out of Centre) 1
Edge of Town 1

Selected Location Sub Categories:

Industrial Zone 2

Inclusion of Servicing Vehicles Counts:

Servicing vehicles Included 2 days - Selected
Servicing vehicles Excluded X days - Selected

Secondary Filtering selection:

Use Class:

Not Known 2 days

Filter by Site Operations Breakdown:

All Surveys Included

Population within 500m Range:

All Surveys Included

Population within 1 mile:

15,001 to 20,000 1 days
25,001 to 50,000 1 days

Population within 5 miles:

125,001 to 250,000 1 days
250,001 to 500,000 1 days

Car ownership within 5 miles:

0.6 to 1.0 2 days

Travel Plan:

No 2 days

PTAL Rating:

No PTAL Present 2 days

LIST OF SITES relevant to selection parameters

1	CF-02-C-02 MAES-Y-COED ROAD CARDIFF	BAKERY	CARDIFF
	Suburban Area (PPS6 Out of Centre) Industrial Zone Total Gross floor area:	14125 sqm	
	Survey date: THURSDAY	06/10/16	Survey Type: MANUAL
2	HF-02-C-02 COCKERELL CLOSE STEVENAGE	FRESH PRODUCE	HERTFORDSHIRE
	Edge of Town Industrial Zone Total Gross floor area:	17834 sqm	
	Survey date: WEDNESDAY	08/11/23	Survey Type: MANUAL

Turner Lowe Associates Guest Road Manchester

Licence No: 756701

TRIP RATE for Land Use 02 - EMPLOYMENT/C - INDUSTRIAL UNIT

TOTAL VEHICLES

Calculation factor: 100 sqm

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00	1	17834	0.067	1	17834	0.011	1	17834	0.078
06:00 - 07:00	1	17834	0.320	1	17834	0.224	1	17834	0.544
07:00 - 08:00	2	15980	0.091	2	15980	0.031	2	15980	0.122
08:00 - 09:00	2	15980	0.119	2	15980	0.028	2	15980	0.147
09:00 - 10:00	2	15980	0.100	2	15980	0.050	2	15980	0.150
10:00 - 11:00	2	15980	0.128	2	15980	0.081	2	15980	0.209
11:00 - 12:00	2	15980	0.041	2	15980	0.072	2	15980	0.113
12:00 - 13:00	2	15980	0.056	2	15980	0.056	2	15980	0.112
13:00 - 14:00	2	15980	0.050	2	15980	0.031	2	15980	0.081
14:00 - 15:00	2	15980	0.041	2	15980	0.069	2	15980	0.110
15:00 - 16:00	2	15980	0.038	2	15980	0.113	2	15980	0.151
16:00 - 17:00	2	15980	0.016	2	15980	0.075	2	15980	0.091
17:00 - 18:00	2	15980	0.144	2	15980	0.125	2	15980	0.269
18:00 - 19:00	2	15980	0.122	2	15980	0.175	2	15980	0.297
19:00 - 20:00	1	17834	0.000	1	17834	0.050	1	17834	0.050
20:00 - 21:00	1	17834	0.000	1	17834	0.017	1	17834	0.017
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			1.333			1.208			2.541

Parameter summary

Trip rate parameter range selected: 14125 - 17834 (units: sqm)
 Survey date date range: 01/01/16 - 08/11/23
 Number of weekdays (Monday-Friday): 2
 Number of Saturdays: 0
 Number of Sundays: 0
 Surveys automatically removed from selection: 0
 Surveys manually removed from selection: 0

Turner Lowe Associates Guest Road Manchester

Licence No: 756701

TRIP RATE for Land Use 02 - EMPLOYMENT/C - INDUSTRIAL UNIT

OGVS

Calculation factor: 100 sqm

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00	1	17834	0.006	1	17834	0.000	1	17834	0.006
06:00 - 07:00	1	17834	0.006	1	17834	0.011	1	17834	0.017
07:00 - 08:00	2	15980	0.009	2	15980	0.003	2	15980	0.012
08:00 - 09:00	2	15980	0.016	2	15980	0.009	2	15980	0.025
09:00 - 10:00	2	15980	0.053	2	15980	0.006	2	15980	0.059
10:00 - 11:00	2	15980	0.063	2	15980	0.009	2	15980	0.072
11:00 - 12:00	2	15980	0.016	2	15980	0.013	2	15980	0.029
12:00 - 13:00	2	15980	0.022	2	15980	0.000	2	15980	0.022
13:00 - 14:00	2	15980	0.009	2	15980	0.003	2	15980	0.012
14:00 - 15:00	2	15980	0.006	2	15980	0.013	2	15980	0.019
15:00 - 16:00	2	15980	0.006	2	15980	0.009	2	15980	0.015
16:00 - 17:00	2	15980	0.006	2	15980	0.006	2	15980	0.012
17:00 - 18:00	2	15980	0.003	2	15980	0.000	2	15980	0.003
18:00 - 19:00	2	15980	0.000	2	15980	0.000	2	15980	0.000
19:00 - 20:00	1	17834	0.000	1	17834	0.000	1	17834	0.000
20:00 - 21:00	1	17834	0.000	1	17834	0.000	1	17834	0.000
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.221			0.082			0.303

TRIP RATE CALCULATION SELECTION PARAMETERS:

Land Use : 02 - EMPLOYMENT
Category : F - WAREHOUSING (COMMERCIAL)
TOTAL VEHICLES

Selected regions and areas:

03	SOUTH WEST	
	DV DEVON	1 days
	GS GLOUCESTERSHIRE	1 days
05	EAST MIDLANDS	
	NT NOTTINGHAMSHIRE	1 days
07	YORKSHIRE & NORTH LINCOLNSHIRE	
	DR DONCASTER	1 days

Primary Filtering selection:

Parameter: Gross floor area
Actual Range: 24500 to 105335 (units: sqm)
Range Selected by User: 20000 to 105335 (units: sqm)

Parking Spaces Range: All Surveys Included

Public Transport Provision:

Selection by: Include all surveys

Date Range: 01/01/16 to 18/10/23

Selected survey days:

Monday 1 days
Tuesday 1 days
Wednesday 2 days

Selected survey types:

Manual count 4 days
Directional ATC Count 0 days

Selected Locations:

Suburban Area (PPS6 Out of Centre) 1
Edge of Town 2
Free Standing (PPS6 Out of Town) 1

Selected Location Sub Categories:

Industrial Zone 1
Commercial Zone 1
Development Zone 1
Out of Town 1

Inclusion of Servicing Vehicles Counts:

Servicing vehicles Included 2 days - Selected
Servicing vehicles Excluded 2 days - Selected

Secondary Filtering selection:

Use Class:

B8 4 days

Filter by Site Operations Breakdown:

All Surveys Included

Population within 500m Range:

All Surveys Included

Population within 1 mile:

1,000 or Less 1 days
1,001 to 5,000 1 days
10,001 to 15,000 1 days
25,001 to 50,000 1 days

Population within 5 miles:

25,001 to 50,000 1 days
100,001 to 125,000 1 days
125,001 to 250,000 2 days

Car ownership within 5 miles:

1.1 to 1.5 4 days

Travel Plan:

Yes 1 days
No 3 days

PTAL Rating:

No PTAL Present 4 days

LIST OF SITES relevant to selection parameters

1	DR-02-F-01 MIDDLE BANK DONCASTER	TESCO DISTRIBUTION CENTRE	DONCASTER
	Suburban Area (PPS6 Out of Centre) Industrial Zone Total Gross floor area: 80100 sqm <i>Survey date: TUESDAY 21/09/21</i>		
2	DV-02-F-03 CHILLPARK BRAKE NEAR EXETER CLYST HONITON	LIDL DISTRIBUTION CENTRE	DEVON
	Free Standing (PPS6 Out of Town) Out of Town Total Gross floor area: 49081 sqm <i>Survey date: MONDAY 22/11/21</i>		
3	GS-02-F-01 GOLF CLUB LANE NEAR GLOUCESTER BROCKWORTH	LOGISTICS WAREHOUSE	GLOUCESTERSHIRE
	Edge of Town Commercial Zone Total Gross floor area: 24500 sqm <i>Survey date: WEDNESDAY 03/05/23</i>		
4	NT-02-F-01 NOOK FLATT ROAD NEAR WORKSOP BLYTH	LOGISTICS WAREHOUSING PARK	NOTTINGHAMSHIRE
	Edge of Town Development Zone Total Gross floor area: 105335 sqm <i>Survey date: WEDNESDAY 18/10/23</i>		
			<i>Survey Type: MANUAL</i>

Turner Lowe Associates Guest Road Manchester

Licence No: 756701

TRIP RATE for Land Use 02 - EMPLOYMENT/F - WAREHOUSING (COMMERCIAL)

TOTAL VEHICLES

Calculation factor: 100 sqm

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate
00:00 - 00:30									
00:30 - 01:00									
01:00 - 01:30									
01:30 - 02:00									
02:00 - 02:30									
02:30 - 03:00									
03:00 - 03:30									
03:30 - 04:00									
04:00 - 04:30									
04:30 - 05:00									
05:00 - 05:30	4	64754	0.038	4	64754	0.017	4	64754	0.055
05:30 - 06:00	4	64754	0.051	4	64754	0.019	4	64754	0.070
06:00 - 06:30	4	64754	0.013	4	64754	0.026	4	64754	0.039
06:30 - 07:00	4	64754	0.024	4	64754	0.029	4	64754	0.053
07:00 - 07:30	4	64754	0.023	4	64754	0.013	4	64754	0.036
07:30 - 08:00	4	64754	0.039	4	64754	0.015	4	64754	0.054
08:00 - 08:30	4	64754	0.033	4	64754	0.014	4	64754	0.047
08:30 - 09:00	4	64754	0.032	4	64754	0.015	4	64754	0.047
09:00 - 09:30	4	64754	0.025	4	64754	0.016	4	64754	0.041
09:30 - 10:00	4	64754	0.022	4	64754	0.025	4	64754	0.047
10:00 - 10:30	4	64754	0.028	4	64754	0.024	4	64754	0.052
10:30 - 11:00	4	64754	0.022	4	64754	0.022	4	64754	0.044
11:00 - 11:30	4	64754	0.019	4	64754	0.014	4	64754	0.033
11:30 - 12:00	4	64754	0.027	4	64754	0.026	4	64754	0.053
12:00 - 12:30	4	64754	0.023	4	64754	0.029	4	64754	0.052
12:30 - 13:00	4	64754	0.027	4	64754	0.035	4	64754	0.062
13:00 - 13:30	4	64754	0.031	4	64754	0.021	4	64754	0.052
13:30 - 14:00	4	64754	0.033	4	64754	0.035	4	64754	0.068
14:00 - 14:30	4	64754	0.021	4	64754	0.055	4	64754	0.076
14:30 - 15:00	4	64754	0.023	4	64754	0.032	4	64754	0.055
15:00 - 15:30	4	64754	0.019	4	64754	0.021	4	64754	0.040
15:30 - 16:00	4	64754	0.019	4	64754	0.025	4	64754	0.044
16:00 - 16:30	4	64754	0.013	4	64754	0.024	4	64754	0.037
16:30 - 17:00	4	64754	0.020	4	64754	0.020	4	64754	0.040
17:00 - 17:30	4	64754	0.018	4	64754	0.026	4	64754	0.044
17:30 - 18:00	4	64754	0.020	4	64754	0.024	4	64754	0.044
18:00 - 18:30	4	64754	0.013	4	64754	0.024	4	64754	0.037
18:30 - 19:00	4	64754	0.009	4	64754	0.016	4	64754	0.025
19:00 - 19:30	4	64754	0.010	4	64754	0.012	4	64754	0.022
19:30 - 20:00	4	64754	0.009	4	64754	0.014	4	64754	0.023
20:00 - 20:30	4	64754	0.010	4	64754	0.011	4	64754	0.021
20:30 - 21:00	4	64754	0.010	4	64754	0.012	4	64754	0.022
21:00 - 21:30									
21:30 - 22:00									
22:00 - 22:30									
22:30 - 23:00									
23:00 - 23:30									
23:30 - 24:00									
Total Rates:			0.724			0.711			1.435

Parameter summary

Trip rate parameter range selected: 24500 - 105335 (units: sqm)
 Survey date range: 01/01/16 - 18/10/23
 Number of weekdays (Monday-Friday): 4
 Number of Saturdays: 0
 Number of Sundays: 0
 Surveys automatically removed from selection: 0
 Surveys manually removed from selection: 0

Turner Lowe Associates Guest Road Manchester

Licence No: 756701

TRIP RATE for Land Use 02 - EMPLOYMENT/F - WAREHOUSING (COMMERCIAL)

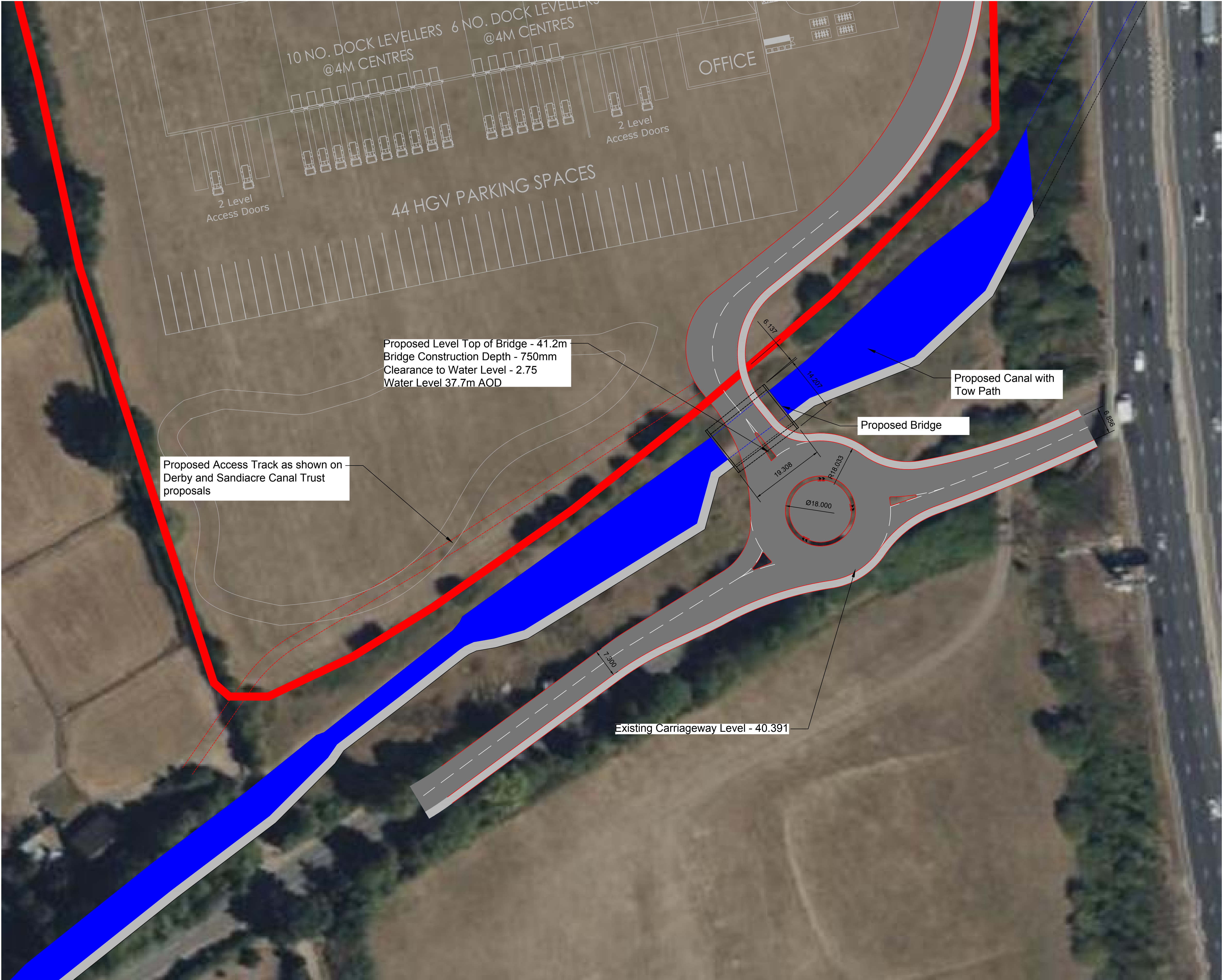
OGVS

Calculation factor: 100 sqm

BOLD print indicates peak (busiest) period

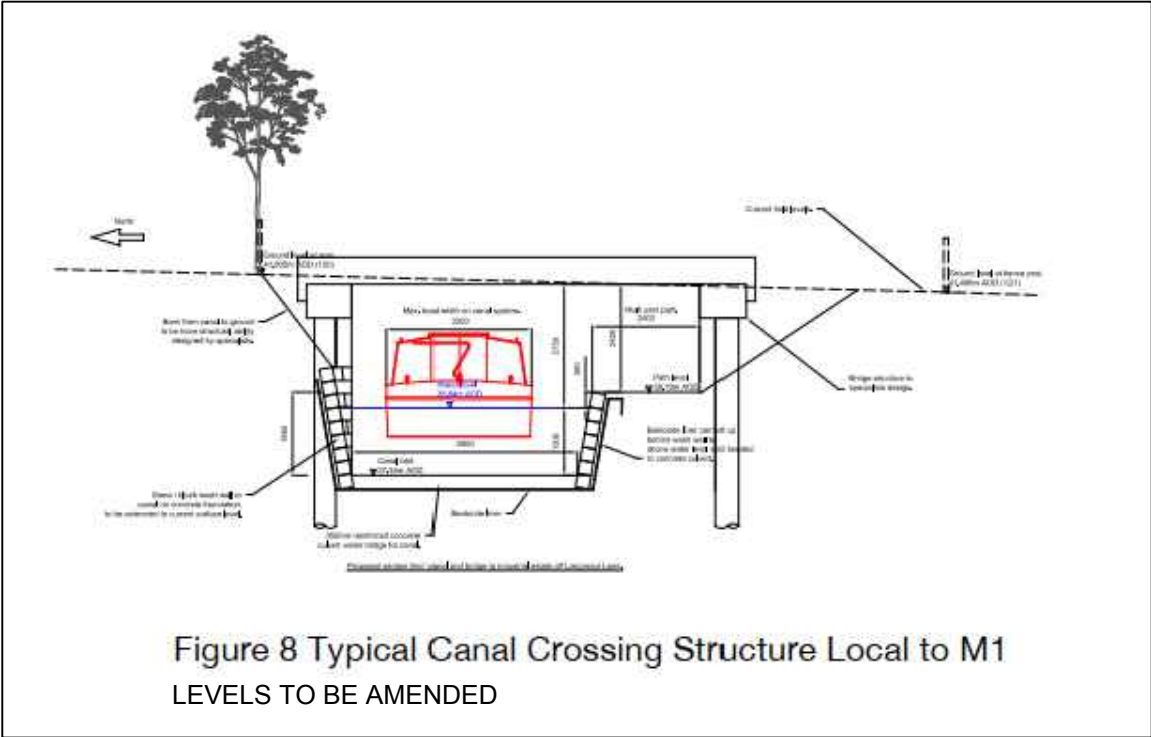
Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate
00:00 - 00:30									
00:30 - 01:00									
01:00 - 01:30									
01:30 - 02:00									
02:00 - 02:30									
02:30 - 03:00									
03:00 - 03:30									
03:30 - 04:00									
04:00 - 04:30									
04:30 - 05:00									
05:00 - 05:30	4	64754	0.007	4	64754	0.007	4	64754	0.014
05:30 - 06:00	4	64754	0.003	4	64754	0.004	4	64754	0.007
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06:30 - 07:00	4	64754	0.008	4	64754	0.004	4	64754	0.012
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07:30 - 08:00	4	64754	0.010	4	64754	0.009	4	64754	0.019
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11:00 - 11:30	4	64754	0.009	4	64754	0.008	4	64754	0.017
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20:30 - 21:00	4	64754	0.003	4	64754	0.004	4	64754	0.007
21:00 - 21:30									
21:30 - 22:00									
22:00 - 22:30									
22:30 - 23:00									
23:00 - 23:30									
23:30 - 24:00									
Total Rates:			0.278			0.275			0.553







Appendix B - Drawing 8118-MJM-XX-XX-SK-D-6650



DESIGNER RISK INFORMATION
IN ADDITION TO THE HAZARDS/RISKS NORMALLY ASSOCIATED WITH THE TYPES OF WORK DETAILED ON THIS DRAWING, NOTE THE FOLLOWING:-
CONSTRUCTION:
MAINTENANCE/CLEANING:
DECOMMISSIONING/DEMOLITION:
IT IS ASSUMED THAT ALL WORKS WILL BE CARRIED OUT BY A COMPETENT CONTRACTOR WORKING, WHERE APPROPRIATE, TO AN APPROVED METHOD STATEMENT.

- NOTE:
1. SKETCH PROPOSALS
 2. SUBJECT TO FULL TOPOGRAPHICAL SURVEY OF EXISTING HIGHWAY.
 3. SUBJECT TO APPROVAL OF HIGHWAY AUTHORITY.



P01	02.04.25	FIRST ISSUE		NT	CB
Rev	Date	Amendment			
<div><div></div><div>Consulting Engineers^{Ltd}</div></div> <div>Southgate House, 38 Southgate, Wakefield WF1 1TL T: 01924 811 000 mjmc.co.uk</div>					
Project: GLP EREWASH					
Client: GLP					
Drawing Title: SOUTHERN ACCESS WITH CANAL ROUNDAABOUT OPTION					
 NT		 CB		 MND	
MJMC Ref: 8118		Scale: 1:500		Sheet Size: A1	
Revision Status: P01		Suitability Status: S2		Date: MAR. '25	
Suitability Description: FOR INFORMATION					
Drawing Reference: Project - Originator - Zone - Level - File Type - Discipline - Number 8118-MJM-XX-XX-SK-D-6650					

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Appendix C – Comments on Original Allocation Application Response

MJM Responses to Access Issues raised as part of “Erewash Core Strategy Review Examination Response to Matters, Issues & Questions (MIQs)”. May 2025 Update

1. *As per the access note, this bridge in its current state is only suitable to serve as a one way car/HGV access and would be wholly unsuitable as the only point of entry/egress due to the lack of emergency access.*

The bridge is now only proposed to provide walking and cycling access to the site.

2. *It is critical to note that the Council has not been made aware of any consultation between Icenl and relevant highway authorities to establish whether proposed upgrades could be made to the bridge.*

As previously stated, at this early stage of allocation it would not be appropriate to discuss detailed access matters with the relevant Highway Authorities. This has, however, now been undertaken on the basis of the final access strategy and the Local and National Highway Authorities have confirmed there are no fundamental objections to the development

3. *To the north west of the site, access is considered on the A52 via an on/off ramp by way of a new junction. There was no evidence submitted with the access statement to suggest that this would be a viable option.*

Whilst this ingress to the site may be considered in the future, and National Highways have offered use of their simulation model of the Sandicare Interchange to assess this, the current focus is on the southern access, which both Highway Authorities have confirmed would be acceptable.

4. *This access is also via a single-track lane and bridge over the A52 which requires significant upgrades to be suitable to accommodate HGV movements.*

Other than pedestrian / cycle access, this bridge will not be used.

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5. *Alternative access is proposed to the south of the site, off Longmoor Lane, Breaston. Issues surround this access point are currently two-fold. Firstly, there is a weight restriction of a maximum of 7.5 tonnes along Longmoor Lane. The access note suggests that the weight limit could be relocated to the west of the proposed site with no impacts, however no evidence has been provided beyond this note to suggest this could be achieved in practice, such as evidence of discussions with the Highways Authority. Until evidence is presented that shows the Highways Authority's support for moving the weight restriction, this option cannot be considered as a viable option.*

Secondly, this access is wholly dependent upon access across third-party land to the south of the site which contains a further Public Right of Way. Whilst this option presents itself to be the most suitable of all the access options considered, it is important to consider the practicalities of gaining access to this third-party land, either through purchasing of the land or through an arrangement with the landowner. The owner of the third-party land that is the promoters are dependent on for access from Longmoor Lane is Erewash Borough Council. It is therefore the opinion of the Council that the third-party land issues prevent the site from being achievable within the Plan period

As detailed in the Final Access and Scoping Note, agreement over the access arrangements has now been received and supports the principle of the allocation.

In the case of the land required for the access from Longmoor Lane this is owned by Erewash Borough Council who could therefore facilitate access in support of the allocation, alongside the canal proposals which would also require this Council-owned land.

**A3. RESPONSE TO EREWASH MARCH 2025 STRATEGIC LOGISTICS
UPDATE**



MAY 2025

Response to Erewash March 2025 Strategic Logistics Update

Iceni Projects Limited on behalf of
GLP

May 2025

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ON BEHALF OF GLP

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Response to Erewash March 2025
Strategic Logistics Update

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3.	MARKET PERFORMANCE	10
4.	QUANTITATIVE NEED AND SUPPLY	13
5.	CONCLUSION	21

1. INTRODUCTION

- 1.1 In August 2022 IcenI prepared the Nottingham Core & Outer HMA Logistics Study (NCOHLS). This study was commissioned by Nottingham County Council on behalf of the authorities comprising the Nottinghamshire Core and Outer Housing Market Area (HMA) being:
- Core: Broxtowe, Rushcliffe, Nottingham City, Gedling, Erewash
 - Outer: Newark & Sherwood, Ashfield and Mansfield
- 1.2 This study considered the future demand for strategic warehousing and logistics facilities across Nottingham Core and Outer HMAs. This followed a study by Lichfields considering needs for broader industrial and employment land. Both studies were intended to inform the Greater Nottingham Strategic Plan, as well as local plans from authorities within the Core and Outer LAs, reflecting the broad-based nature of strategic logistics needs.
- 1.3 Erewash District Council is currently undergoing examination for the review of the Local Plan. This Plan was at the Regulation 19 stage when the NCOHLS was finalised, and Erewash Council argued that the NCOHLS came too late to inform the plan preparation.
- 1.4 Along with other additional evidence documents, Erewash Council have produced a note responding to the Logistics Study (NCOHLS) (EBE2) and to the broader question of strategic industrial needs in the Erewash District. This report responds to the Council's Note – Erewash Strategic Logistics Update Report, March 2025 - and reiterates the real and unmet need for strategic logistics development along the M1 corridor including through Erewash.
- 1.5 IcenI is acting for GLP in promoting land to the Southwest of Junction 25 of the M1 for strategic logistics development, identified as Site EBC-L02 in the Greater Nottingham evidence base.

Status of IcenI Study and Erewash response

- 1.6 Erewash's note appears as a critique of the jointly prepared 2022 HMA Logistics Study which the Council has prepared unilaterally. The Council's Note directly attempts to undermine the joint evidence base which, along with other authorities, Erewash was involved in commissioning and signing off. The joint evidence in EBE2 has been discussed and agreed with LPA partners throughout the Core and Outer Nottingham HMA through the Duty to Co-operate. However it is not clear what, if any, engagement has taken place with the other commissioning authorities in the preparation of the Council's March 2025 Note.
- 1.7 This is important in the context of the requirements for effective co-operation and the duty to co-operate set out in paragraphs 24-27 of the 2021 National Planning Policy Framework (NPPF). In

these paragraphs the NPPF identifies strategic planning across local authority boundaries as vital in addressing sustainable growth, and in the production of a positively prepared and justified strategy.

- 1.8 The importance of collaboration across a broader market area (i.e. beyond local boundaries) in planning for strategic logistics is identified in the PPG, which in paragraph 2a-031-20190722 states (emphasis added):

Strategic facilities serving national or regional markets are likely to require significant amounts of land, good access to strategic transport networks, sufficient power capacity and access to appropriately skilled local labour. Where a need for such facilities may exist, strategic policy-making authorities should collaborate with other authorities, infrastructure providers and other interests to identify the scale of need across the relevant market areas.

- 1.9 Elements of this collaboration are identified as engagement with logistics developers and occupiers, analysis of market signals, analysis of economic forecasts and engagement with LEPs. Strategic policy-making authorities are then directed in PPG Para 2a-031 to consider to most appropriate locations for meeting identified needs. Again this will require cooperation between LPAs.
- 1.10 To identify the need for land for logistics, the NCOHLS (EBE2) complies fully with the PPG including each of the elements identified. It considered need at the market area (full HMA) scale, and was prepared with the participation of all relevant LPAs. It then identified appropriate areas of search for land for new logistics facilities, including Junction 25 of the M1.
- 1.11 The Council's note suggests that Iceni may have been subject to confirmation bias in reaching similar conclusions to Lichfields EBE1 evidence. There was no confirmation bias in Iceni's preparation of the NCOHLS. Rather, Iceni looked at and triangulated a range of evidence and different forecasting techniques, as well as considering market signals and industry engagement in exactly the way envisaged by the PPG.
- 1.12 By contrast, Erewash's update note does not consider these important factors and is not compliant with the PPG guidance on logistics evidence, noting that:
- There is no evidence of engagement with logistics developers and occupiers, as the PPG requires;
 - There is no evidence that the note has been discussed with other LPAs or the relevant LEP as the Duty to Cooperate requires;
 - The note does not include direct analysis of market signals or economic forecasts, beyond a critique of a limited number of the structural drivers influencing the logistics sector;

- 1.13 As a result of these fundamental flaws, Erewash's note should be very little weight as appropriate evidence regarding the need for strategic logistics land and premises. The jointly commissioned evidence in EBE02 across the relevant market area remains the most relevant and up to date evidence on this point in the Nottingham HMA.

Structure of this report

- 1.14 The following chapters of this report address each of the criticisms levelled in Erewash's Note. The Council's note makes the following broad points:
- That underlying demand for logistics premises is overstated in the EBE02 study as a result of stagnation of online retail since COVID-19, and of Erewash not falling within the Golden Triangle. These issues are responded to in **Chapter 2 – Underlying Demand**
 - That the EBE02 study came at a high point of logistics demand during the COVID-19 pandemic, and that more recent market performance has been weaker, meaning the historic and market data underpinning the needs modelling is not reflective of future demand. This is addressed in **Chapter 3 – Market performance**
 - That as a result of more appropriate selection of demand scenarios, and an update of pipeline supply, the full need for strategic logistics land is being met without the need for any Green Belt release within Erewash. This is addressed in **Chapter 4 – Quantitative Need and Supply**.
- 1.15 This Report concludes that the analysis of the NCOHLS remains robust, and that there remains an unmet need for strategic industrial land in the M1 corridor through Erewash, which constitutes exceptional circumstances justifying the release of Green Belt land.

Consequences of failing to meet need

- 1.16 Failing to meet this need would have real consequences for Erewash and the broader sub-region, including a reduction in potential economic and employment growth, with resulting implications for local unemployment and broader social outcomes.
- 1.17 The NCOHLS also discusses the local labour market, finding that local unemployment meant there were sufficient levels of nearby available labour supply to support logistics development. As of the most recent data (the 12 months up to December 2024), the unemployment rate in the Nottingham HMA sat at 6.1%, while Derby's unemployment rate was 7.1%¹.

¹ ONS 2025 *Annual Population Survey*

- 1.18 As noted in the NCOHLS, and contrary to many perceptions, the logistics industry employs people at a wide variety of occupation and skill levels, with average pay in the sector above the national average for all jobs. 2019 research by the Freight Transport Association shows 9.9% of jobs being held by managers and directors, with significant numbers of additional professional jobs². The British Property Federation has found substantial recent growth in professional, associate professional and technical jobs in the logistics sector³. These trends are likely to continue in the future as new technologies and changes in the logistics sector continue to increase the number of highly skilled jobs.
- 1.19 As a result, strategic logistics development has the potential to provide needed jobs at a wide range of skill levels. It would also support broader economic growth, given the vital role of the logistics sector in supply chains across the economy.

² Freight Transport Association 2019, *Logistics Skills Report*

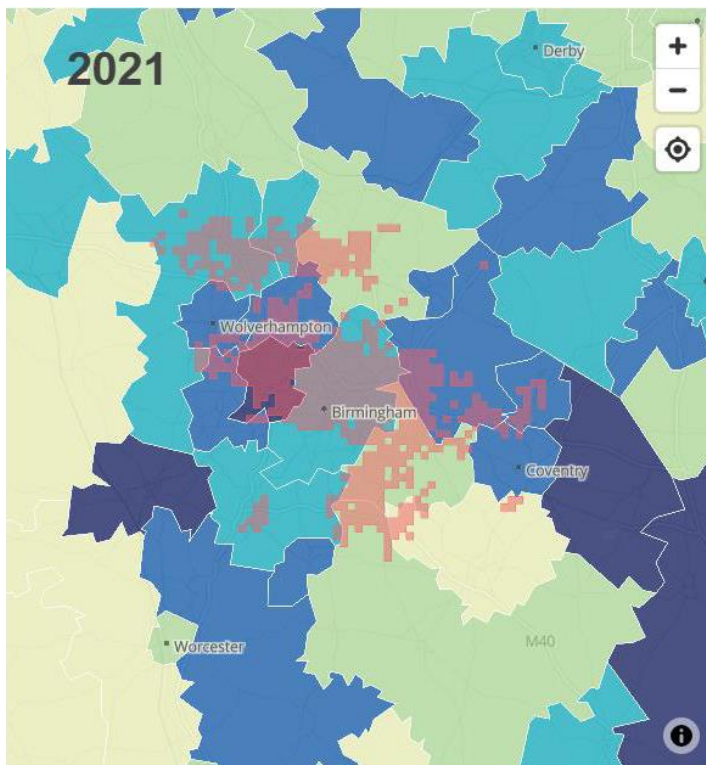
³ BPF 2022 *Levelling up – The Logic of Logistics*

2. UNDERLYING DEMAND

Extent of the Golden Triangle

- 2.1 Erewash BC are critical of the NCOHLS Study including of parts of Erewash and Nottinghamshire in the Golden Triangle, and argue that this means Iceni have overstated local demand for logistics uses.
- 2.2 The Council state that the term “Golden Triangle” originated as a marketing concept for Magna Park in Lutterworth in the 1980s and has since been broadly applied to various overlapping areas within central England. Their report cites a 2022 ONS study which mapped areas within a four-hour HGV drive of 90% of the British population. This analysis found an area confined to the Birmingham, Wolverhampton and Coventry areas, not extending to Leicestershire or Nottinghamshire (shown below).

Figure 2.1 Are covered by the Golden Triangle according to ONS study, as cited in Council’s note



Source: Erewash Council *Erewash Strategic Logistics Update Report March 2025*

- 2.3 The Council suggest that much of the NCOHLS Study rationale for the market geography rests on stretching the definition of the Golden Triangle to include South Nottinghamshire, which the Council contends is erroneous. They argue that the study area lacks the same accessibility to the British population as sites located further south, and that comparisons with more successful logistics areas

such as Leicestershire and Northamptonshire overlook intrinsic geographic advantages enjoyed by those regions.

Iceni Response

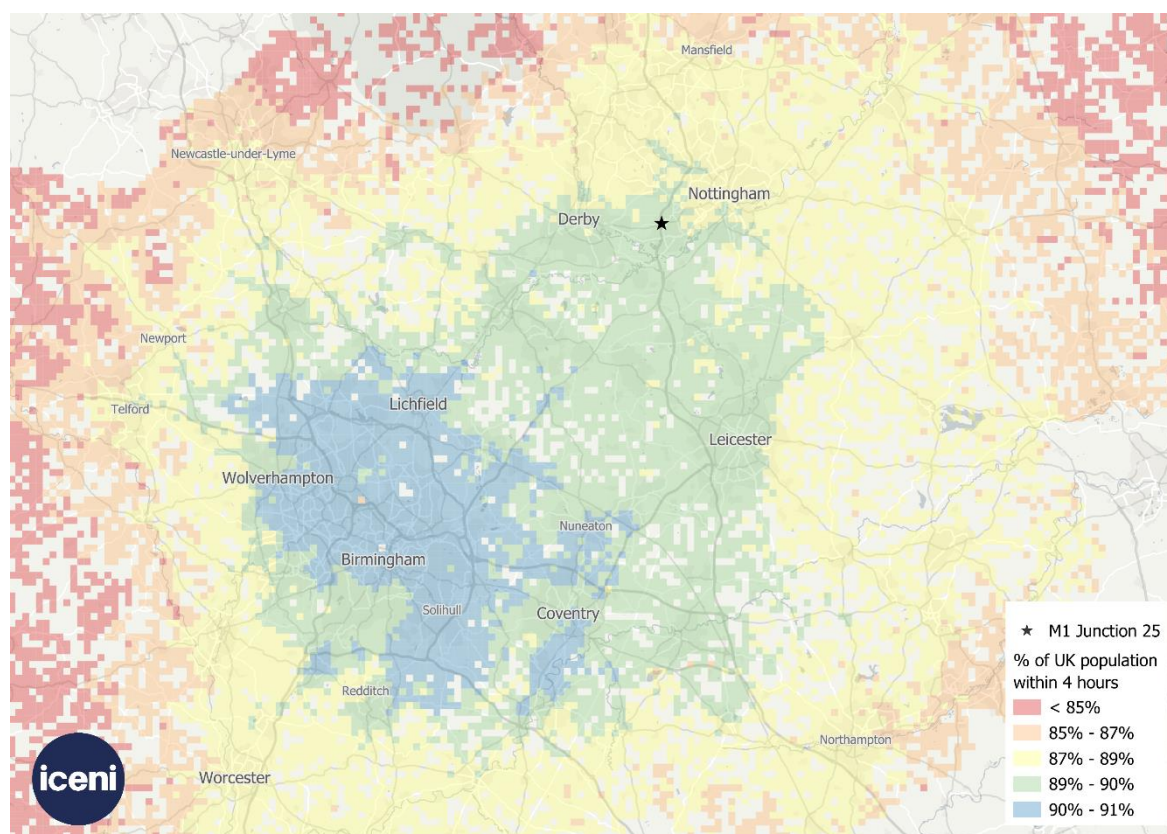
- 2.4 The Council's arguments rely on the results of the 2022 ONS analysis regarding population accessibility, and this source only. This was an *ad-hoc* analysis by the ONS, which appeared in an article written by an ONS statistician about the Golden Triangle. It did not use an accredited or tested method and was not an official statistical release. The ONS article notes a number of caveats, including:
- The travel time calculations did not account for traffic or time of day and so do not necessarily represent real-world journey times;
 - Additional travel times within private land were not accounted for;
 - The analysis was based on 2011 population results.
- 2.5 There was no property market input evident to the ONS article, to ensure its reflected market realities, nor indeed any evident engagement undertaken in its preparation. Property market engagement and market understanding is key to defining a relevant market area in the terms envisaged in the PPG.
- 2.6 In the context of these limitations, these results should be considered as contextual only and should not be relied upon to definitely define the boundaries of the Golden Triangle. In addition, the area shown in the ONS study and Figure 2.1 uses a binary cut-off of 90% of the UK population being reachable within 4 hours. Areas which can reach 89% or 85% of the population, for example, are excluded but are not likely to be significantly less competitive as locations for logistics users seeking to deliver NDCs (or indeed RDCs).
- 2.7 A further concern with relying on the ONS results is that they do not consider the wide range of other matters which make land more or less suitable for, and attractive for, strategic logistics. In particular, high demand sites have access to a broad labour pool, have easy access to major transport infrastructure beyond what would be revealed in travel time calculations, and do not have substantial land use conflicts with surrounding uses. The reality is that the market area has grown over time.
- 2.8 It is noted that the M1 corridor west of Nottingham has excellent access to labour from Nottingham, Derby and surrounds, and that this was identified as a key factor in the success of the East Midlands Gateway and other logistics development proximate to the East Midlands Airport.
- 2.9 Rather than relying on a limited and mechanistic definition of the Golden Triangle, as the Council has, it is more appropriate to consult a range of sources, property professionals and consider market data regarding which areas are most in demand for strategic logistics uses. A variety of reports and web pages discuss the Golden Triangle as extending as far west as Birmingham, as far south as

Northampton, and up the M1 corridor to Greater Nottingham, an area which would cover J25 of the M1.

2.10 The NCOHLS was informed by consultation with a range of stakeholders and property professionals who considered the M1 up to J28 to have very high potential demand for logistics uses, similar to that seen in Leicestershire. This was supported by property market analysis within the report.

2.11 Notwithstanding Icení's concerns with Council's reliance on a single statistical analysis, Icení has updated and expanded upon the ONS analysis, using ONS's published method and data on Github and updated 2021 population estimates. The results are shown in the Figure below.

Figure 2.2 Accessibility of West and East Midlands to broader UK population



Source: Icení using ONS analysis and *Environmental Information Data Centre 2025 UK Gridded Population* at 1km resolution for 2021

2.12 The results show that a similar area to that identified by the ONS is accessible to 90% of the UK population within a four-hour drive (i.e. Birmingham, much of the West Midlands built up area, Lichfield, Tamworth and Coventry). However, a much broader part of the Midlands can access 89% of the UK's population within four-hours, including the M1 corridor from north of Northampton to around Nottingham. An even broader area, shown in yellow above, comprising most of the Midlands can reach 87% or more of the UK population within four hours. This analysis supports the identification of J25 of the M1 as firmly within the Golden Triangle, especially given its access to

labour reflecting proximity to Leicester and Derby and the correlation of this analysis with the property market engagement in the NCOHLS Study.

Comparability of SW Nottinghamshire with Leicestershire

- 2.13 The Council also criticise the NCOHLS Study in considering market demand from M1 J24 to J28 based on conditions elsewhere including in Leicestershire. The Council assert that such comparisons are invalid due to fundamental differences in local logistics characteristics, including the presence of East Midlands Airport in North West Leicestershire, which plays a unique role in the national freight system.

Iceni response

- 2.14 The Council highlight the presence of the East Midlands Airport as a key feature differentiating Leicestershire from the Nottingham HMA. However, the East Midlands Airport and the East Midlands Gateway RFI are very near the boundary between North-West Leicestershire and Erewash, and are situated very close to the M1. The M1 corridor through Erewash and the Nottingham HMA are therefore equally competitive with Leicestershire for logistics uses on this basis. M1 Junction 25 is less than 8 miles to East Midlands Airport and less than 7 miles to East Midlands Gateway – considerably closer than many locations in Leicestershire.
- 2.15 As outlined above, the M1 corridor within the Nottingham HMA, including J25, benefits from a range of other locational characteristics making it comparable to Leicestershire and other areas which have experienced rapid logistics development. This includes excellent access to labour, the motorway network and a broad portion of the UK population.

Drivers of Logistics

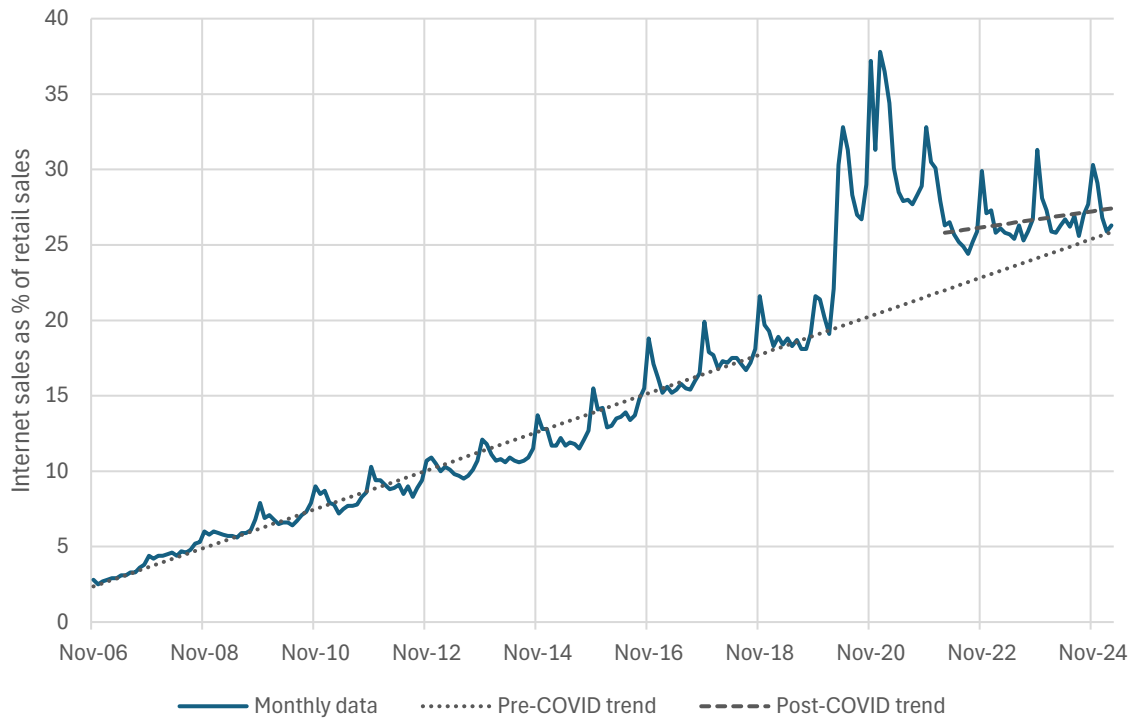
- 2.16 The Council report that contrary the expectations in the NCOHLS Study, the trend of rapid e-commerce growth has not been sustained post-2020 and has instead plateaued around 30.5% over the last three years. This suggests that the rapid growth observed during the pandemic was a one-off event rather than a new long-term trajectory, undermining this significant driver of growth in logistics.

Iceni response

- 2.17 The latest ONS data on the proportion of retail sales that take place through e-commerce is shown in the figure below, along with trend lines through the pre-COVID (i.e. before March 2020) and post-COVID (i.e. post April 2022) datapoints. While the post-COVID growth rate is slower than the pre-COVID growth rate, e-commerce has not plateaued. Indeed, e-commerce has a larger market share

than it would have had if the pre-COVID trend had continued. As the e-commerce sector continues to grow, it will continue to drive the demand for logistics premises.

Figure 2.3 Online retail market share



Source: Iceni analysis of ONS *Retail Sales Index Time Series*

2.18 Iceni would note that the NCOHLS Study was not envisaging that the higher levels of e-commerce seen during the pandemic would per se continue longer-term; with the expectation being that there would be a return to the long-term trend (see Para 4.3). The analysis above continues to support this.

2.19 In addition, e-commerce is only one of the several drivers for new logistics premises. The movement of goods is important to a broad range of economic sectors, with a much broader set of drivers identified in the NCOHLS Study which are not referred to. These include:

- Re-shoring of industrial activities;
- Other moves towards supply chain resilience – including increased stock holding;
- Automation of logistics, driving requirements for larger and higher warehouses with sufficient power;
- Decarbonisation, which again emphasises the need for modern warehousing.

2.20 The Council's Note appears to have no regard to these wider demand drivers.

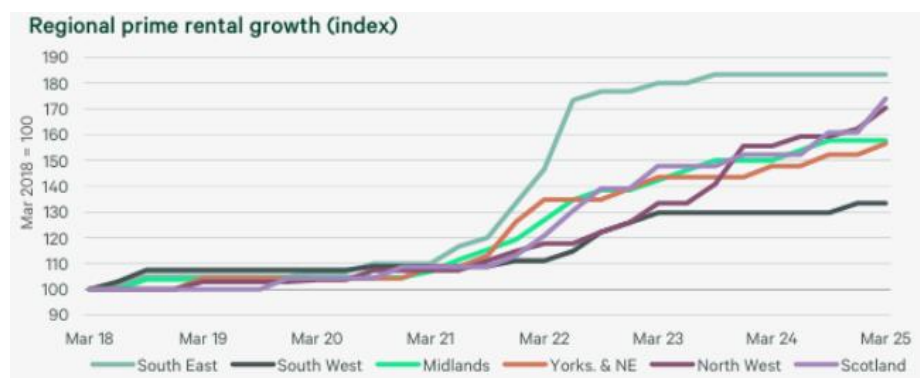
3. MARKET PERFORMANCE

- 3.1 The Council state that the NCOHLS report was prepared at a high point in the logistics market, and that rental values for logistics properties began to decline as early as 2021 reflecting drops in demand. While recent rent data is not presented, the Council infer that the stagnation in e-commerce activity is likely mirrored in a stagnation of rents.
- 3.2 The Council also question the validity of the absorption rate-based projections in the NCOHLS report, particularly the use of 2016–2021 trends which include an atypical 2020 spike. The Council argues that using this timeframe inflates projected demand, as the period contains an anomalous year of accelerated growth that is not representative of the longer-term market trend.

Iceni response

- 3.3 As shown in the figure below, rents for prime logistics space in the Midlands have continued to increase steadily over the last few years, albeit at a slower rate than the peak level of increase seen during COVID. By contrast, while the South East saw a more dramatic increase in rents during COVID, they have been relatively flat since then suggesting less continued demand. In their market summaries, Savills finds that grade A logistics rents in the East Midlands have increased by 4% from 2024 to 2025, following rises of 8% from 2023-24 and 8% from 2022-23. The suggestion that rents have plateaued is therefore not borne out in the evidence.

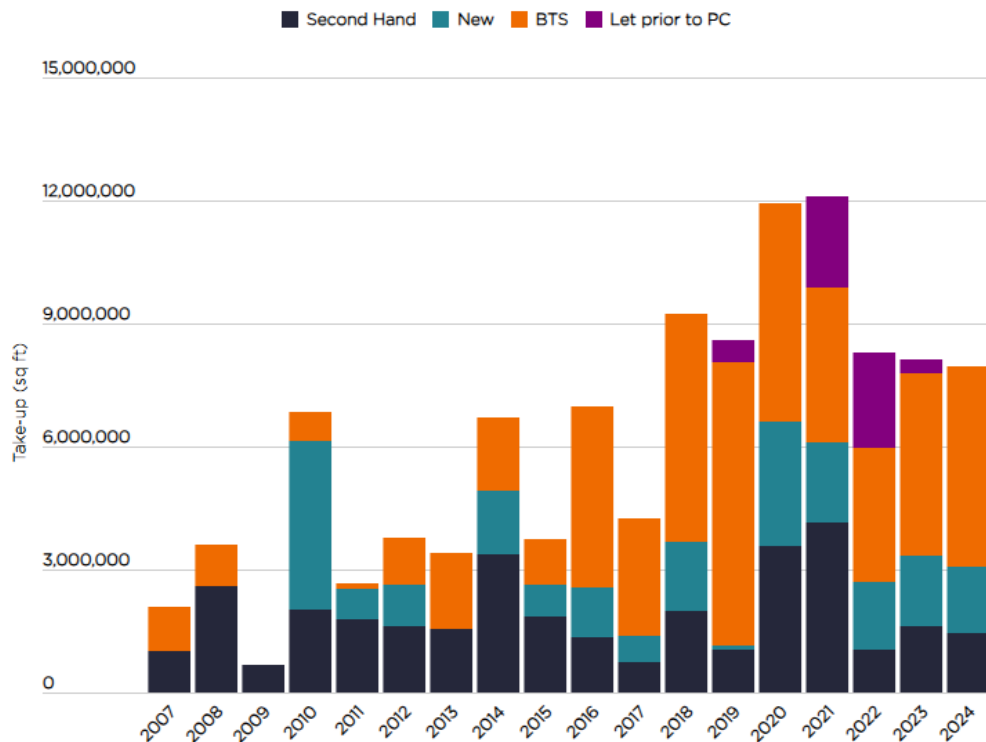
Figure 3.1 Logistics prime rental index by region (Mar 2018 = 1)



Source: CBRE *UK Logistics Market Summary Q1 2025*

- 3.4 At the same time, there has continued to be strong take-up of logistics space in the East Midlands. Savills data shown in the figure below shows take-up to be down from peak levels seen in 2020 and 2021, but similar to the high levels seen in 2018 and 2019 and well above the pre-COVID average.

Figure 3.2 Take-up of logistics space in the East Midlands



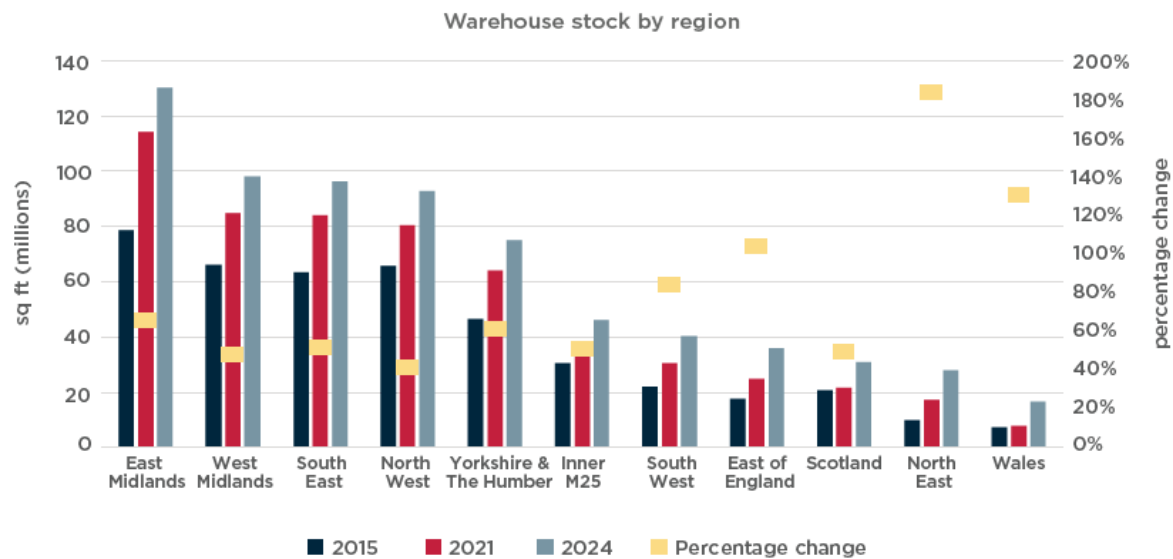
Source: Savills *The logistics market in the East Midlands January 2025*

https://www.savills.co.uk/research_articles/229130/371307-0

- 3.5 It is noted that while East Midlands logistics take-up rates may have been abnormally high in 2020 and 2021, post-COVID take-up rates seen in 2022-24 are likely to have been similar to the average across the 2016-21 period which included periods of lower take-up as well as a high take-up year in 2020. As a result, Icení's absorption-based projections using data from 2016-21 do not appear to be unreasonable in the light of more recent data.
- 3.6 The East Midlands continues to have the largest stock in logistics and large-scale warehouse space in the Country, and there were substantial levels of delivery of stock between 2021-24 as well as between 2015-21. CBRE report that in the 12 months to Q1 2025, 30.7% of UK logistics take-up occurred in the East Midlands, the most of any region, with the South West having the next highest share at 15.0%⁴. The evidence thus continues to point to strong market demand.

⁴ CBRE *UK Logistics Q1 2025 Market Summary*

Figure 3.3 Warehouse stock by region



Source: UKWA UKRA Report 2024: *The Size and Make-up of the UK Warehousing Sector*

- 3.7 Vacancy rates have increased recently for logistics stock in the East Midlands, with Savills reporting a rate of 10.3% was reached in January 2025. While this is a substantial increase from the near-zero levels of stock availability in late 2021 and early 2022, Savills attribute this spike to occupier consolidation into newly speculatively developed units (as opposed to older units that do not meet modern standards), and the failure of some companies. It reflects an overhang of dated, poorer quality stock. The need for newer modern stock as the requirements of the Logistics industry evolve is one of the key drivers of logistics demand noted in the NCOHLS report.
- 3.8 Savills estimate the currently available stock in the East Midlands to be around 2.2 years of supply at likely take-up rates. As a result, while vacancy rates have increased, additional logistics stock will continue to be needed particularly over a medium or longer term plan period.
- 3.9 Recent market data presented in this section indicates that, in line with the Council’s note, 2020-21 did see a spike in logistics demand but the fundamentals of strong demand remain. Demand for new logistics space in the East Midlands continues to be robust, and rents have continued to grow. Continued growth in logistics space needs across the Country, combined with the strong competitive position of the East Midlands and the underlying demand drivers highlighted in the previous chapter and in the NCOHLS are likely to continue to drive the need for new logistics space in the East Midlands and in the M1 Corridor within the Nottingham HMA.

4. QUANTITATIVE NEED AND SUPPLY

Floorspace need

- 4.1 The Council have reviewed the range of modelled logistics needs scenarios in NCOHLS report (reproduced in the table below), and based on the **completions annualised, 2012-21 net absorption** and **TGRD Low** and **Central** scenarios triangulated logistics need to be between 550,000 – 750,000 sqm of new floorspace over 20 years. The Council suggest that given the stalled logistics markets, the need over a 20-year period starting in 2024 is not likely to have substantially increased compared to the modelled period of 2021-2040.

Table 4.1 Range of modelled large scale logistics unit needs (sqm)

	Study area need 2021-40	Need with margin
Labour demand	-51,000	135,000
Completions annualised	707,000	893,000
2012-21 Net absorption	554,500	731,400
2017-21 Net absorption	927,300	1,113,300
TGRD Low	574,000	760,000
TGRD Central	744,000	930,000
TGRD High	1,084,000	1,270,000
Share of M1 J24-28	1,600,000	1,786,000
Increased delivery relative to Notts / L&L	1,300,000	1,486,000

Source: Icení NCOHLS

- 4.2 The Council have rejected the other scenarios considered in NCOHLS modelling on the following bases:
- **2017-21 Net Absorption – the** Council consider results for this time period to be inflated by the anomalously high net absorption in 2021;
 - **TGRD High – the** Council consider it unrealistic to assume that all warehouses over 20 years old require replacement;
 - **Share of M1 J24-28 and Increased delivery relative to Notts / L & L – the** Council note that Leicestershire, and specifically J24 in North-West Leicestershire, includes the unique logistics submarket of the East Midlands Airport, undermining the comparability of this area with the Nottingham HMA;
 - **Labour demand – the** Council agree with Icení's assessment in the NCOHLS that labour demand is not a good indicator of future logistics need.

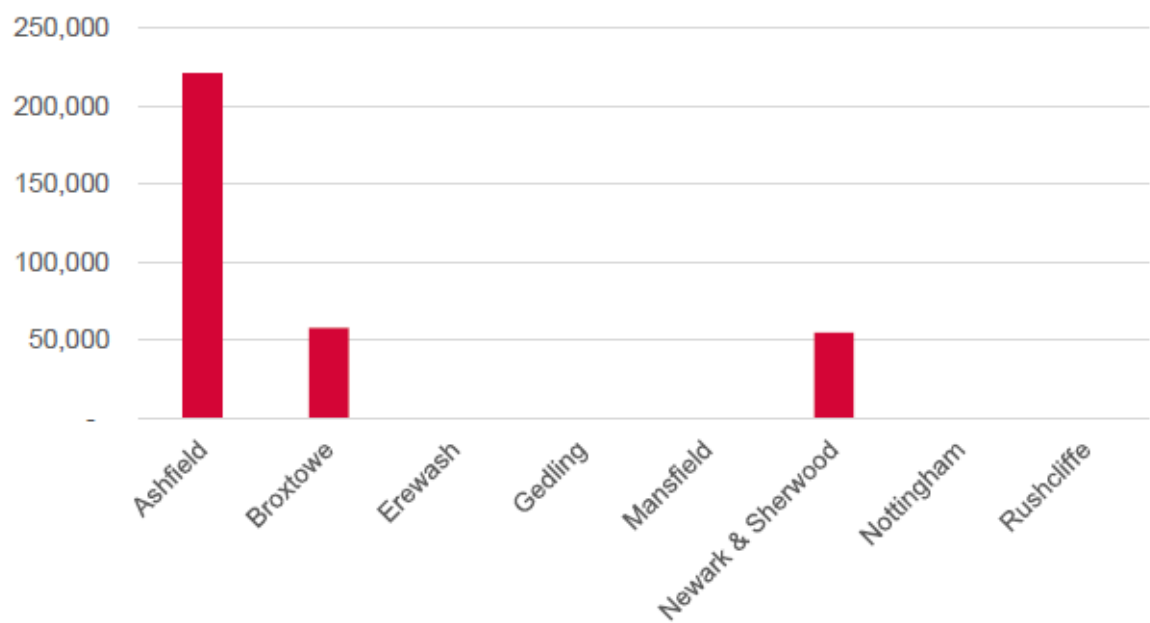
4.3 The Council disagree with the inclusion of a margin of 5 years of supply in Icení’s modelling, suggesting this to be an excessively high level of margin which is not required by national policy or guidance.

Icení Response

4.4 Based on the range of modelling scenarios considered, the NCOHLS report recommended that strategic logistics need within the study area should be considered to be between 1,270,000 – 1,486,000 sqm. Icení considers that the arguments which led to this selection of results remain robust, and that this should continue to be considered the 20-year need over the modelled period. The reasoning behind this conclusion is set out below.

4.5 Historic completions and net absorptions in the study area were suppressed by the significant supply-side constraints including those posed by the Green Belt located around the M1 junctions in the Nottingham HMA, as illustrated in the figure below which has been reproduced from the NCOHLS (where it was labelled Table 7.5). As a result the **Completions annualised** and **Net absorption** scenarios are not an accurate representation of likely future market need. These simply perpetuate past land supply constraints.

Figure 4.1 Strategic warehousing completions, 2011 to 2021 (floorspace, sqm)



Source: Local authority data

4.6 The conclusions of the NCOHLS Study were agreed collectively in signing-off of the report. In presenting alternative evidence, it is not evident that the Councils have engaged more widely with its partners across the market area.

- 4.7 As noted in the NCOHLS, records suggest that around 75% of stock in the Study Area was older than 2000. Particularly in the context of the substantial changes in the logistics sector including automation and associated increases in ceiling heights and power requirements now required by operators to facilitate automation of warehousing activities, it is not unreasonable to assume that more than 63% of stock will require replacement by 2040 (the assumption in the TGRD Central scenario). The need for replacement with new stock is heightened by the need to adapt designs to decarbonise the logistics sector. The Council have not appropriately considered these factors which underpinned the adoption of the **TGRD High** as the preferred TGRD scenario in the NCOHLS Study.
- 4.8 As outlined in Chapter 2, Icenl continues to consider that the locational advantages of the study area are comparable to those of Leicestershire and other locations considered in the NCOHLS. Equally it is evident, and was indeed accepted by the LPAs as part of the NCOHLS Study that planning policies historically had constrained delivery of strategic logistics development. These supply constraints have not been abated by changes to planning policies within local plans. These factors underpinned the **Share of M1 J24-28** and **Increased delivery relative to Notts / L&L** scenarios which continue to be considered as reasonable representations of future demand based on broader market signals (in line with PPG 2a-031) and considering past market constraints.
- 4.9 As outlined in the NCOHLS, it is important that a buffer be included in the needs figure:
- To ensure a safety margin to account for potential delays in sites or plots coming forward;
 - To provide an additional buffer to ensure that supply is not too tightly matched to forecast demand (including to provide flexibility to take account of different unit sizes/ market requirements); and
 - To allow for an effective vacancy rate within the property market (between 5-10%).
- 4.10 To allow for an appropriate vacancy rate, a buffer of 5-10% would be considered the minimum appropriate. The size of the buffer on top of this should reflect the underlying risks to site delivery. There are substantial delivery risks in this case given that much of the M1 corridor is currently covered by Green Belt, potential substantial infrastructure requirements, and delivery concerns around several of the proposed strategic industrial sites in the Nottingham HMA (for example the Ratcliffe on Soar Power Station). As a result, a relatively high buffer as proposed in the NCOHLS is appropriate. While a numerical buffer requirement is not explicitly set out in the NPPF and PPG (as opposed to the more explicit requirements for housing), planning for a buffer which is mindful of delivery risks is an essential part of a positively prepared plan.
- 4.11 It is still therefore considered appropriate to plan for 1,270,000 – 1,486,000 sqm of strategic logistics floorspace over the study period, in line with the NCOHLS. Using the 0.35 indicative plot ratio from the NCOHLS this is equivalent to a land need of between 363 – 425 ha. However, many strategic logistics facilities recently are achieving around a 0.3 plot ratio due to greater requirements to landscaping and BNG, which would translate into an increased land need of 423 – 495 ha. On this basis, planning for at least 425 ha would appear to be appropriate.

Floorspace supply

- 4.12 The Council highlights several major sites which they state will provide strategic logistics floorspace to meet assessed needs. This includes 101.07 ha of allocations and draft allocations in nearby authorities. They also cite potential provision of logistics space at the New Stanton proposed allocation within Erewash, and at Ratcliffe Power Station (which is in Rushcliffe Borough). There is also a pipeline of permissions and allocations noted in the NCOHLS of 315,233 sqm.

Iceni response

- 4.13 Iceni have not comprehensively reviewed the current pipeline supply position including current planning permissions, as data from all relevant authorities is not available. In this context, a partial update to the comprehensive evidence base in NCOHLS as undertaken by Erewash should be used with caution and afforded little weight. An update to the joint evidence would be needed to provide a more certain current supply position.

- 4.14 The following concerns are noted about the additional pipeline sites that Erewash BC refer to, having regard to the site and locational considerations identified in the NCOHLS:

- **New Stanton Park:** Hybrid planning permission was granted for this site in 2022 comprising 261,471sqm of a mix of E(g)(iii), B2 and B8 floorspace. However, subsequent reserved matters applications for the site have under-delivered the total quantum of floorspace envisaged, and have differed from the illustrative masterplan in the reserved matters application in providing smaller units rather than the 100,000 + sqft units that would constitute strategic logistics.

In addition, and as noted by Council, this site does **not** have good access to the strategic motorway network, requiring travel down several local roads to reach the M1. This severely limits the site's competitiveness and suitability for strategic logistics.

Without further certainty as to the quantum of large B8 units to be delivered, and noting the concerns with strategic motorway access, this site should not be considered to make any significant contribution to meeting the identified strategic logistics need.

- **Ratcliffe on Soar Power Station:** The local development order (LDO) which is in place for this site has a strong focus on advanced manufacturing and energy uses. It restricts B8 to the northern part of the site and to a maximum quantum of floorspace of 180,000 sqm GFA. Iceni has concerns on the potential delivery timeframes of any floorspace on this site, noting significant infrastructure requirements and the need for substantial site remediation following removal of Gypsum on the site.
- **Ashfield Junction 27:** This draft allocation is for two parcels at Junction 27, which was an identified area of search in the NCOHLS. The Draft Ashfield Local Plan notes the site to the south-east may only come forward at the latter part of the plan period (i.e. towards 2040) and

that it is substantially affected by HS2 Phase 2b safeguarding which potentially limits development potential. While the Government has announced plans to amend HS2 phase 2b safeguarding, this has not yet occurred and so there is a lack of certainty as to the timeframe of quantum of available land in this south-eastern land portion.

The draft Ashfield Local Plan notes the north-eastern portion of land to be 20.47 ha, with a potential net developable area of 18.42 ha at a 90% ratio.

- **Land East of Lowmoor Road (Ashfield):** This is a draft allocation for of 11.11 ha of land for “office, light industrial, research and development, general industrial and storage/distribution” use (Policy EM2 of the draft Ashfield Local Plan). It has moderately good access to the strategic road network, being close to the A38 which connects to an M1 junction along a mostly dualled stretch of road. Nonetheless, this land parcel is not adjacent to an M1 junction, and some infrastructure improvements may be required if strategic logistics were to be delivered.

This site is small at 11.11 ha, with the NCOHLS noting sites for strategic logistics should be a minimum of 25 ha and ideally 50 ha or above to provide a flexible configuration for accommodating the large warehouse units in demand and support infrastructure delivery alongside development.

Given the small size of this site, the uncertainty regarding infrastructure and its proposed allocation for a variety of employment uses, it should not be considered to meet the identified strategic logistics need without further evidence.

- **Top Wighay Farm (Gedling):** the Council cites 6.52 ha of land at Top Wighay Farm as additional supply. There is a strategic allocation of 8.5 ha of land in the Gedling Local Plan for B1, B2 and B8 uses, which is surrounded by a strategic allocation for a residential extension of Hucknall (which has been granted outline planning permission).

This is a very small site, well below the identified appropriate size range of strategic logistics uses. The proposed surrounding residential development would also be a constraint on strategic industrial development. The site does not have good access to the M1, being connected by Annesley Road and the A608.

Given this site’s size, context, and allocation for a mix of employment uses, it should not be regarded as appropriate to meet the identified need for strategic logistics floorspace.

- **West of Colliery Lane, Rainworth:** This is a 5.5 ha parcel of land adjacent to Rainworth and the A617 allocated for B1/B2/B8 uses. It is a substantial distance from any motorway, with the M1 accessed by several A roads through the Mansfield, Sutton-in-Ashfield and Kirkby in Ashfield areas, making it likely highly uncompetitive for strategic logistics use. Its small size, context and likely development for general industrial uses make it very unsuitable to be considered as contributing to strategic logistics land supply.

4.15 Of the five sites of additional supply listed in Appendix 1 of Council’s note, Iceni therefore considers that only the northern portion of Ashfield J27 (20.47ha) and Bennerley Coal Disposal Point (61ha)

should be considered against the unmet strategic logistics needs making 81.47 ha in total. Of these, J27 was included as part of the potential future pipeline (not included in the 315,233 sqm of allocations and permissions) identified in the NCOHLS.

- 4.16 It is worth noting, however, that the Bennerley Coal Disposal Point faces a considerable number of delivery constraints related to ecology, drainage, heritage, and its previous use. These constraints result in a very low site density, meaning the site's actual contribution to meeting strategic logistics needs is likely to be significantly less than its gross area would suggest.

Constraints of M1 Junctions

- 4.17 The Council note several constraints of junctions 25-28 of the M1 which they assert make them less suitable for strategic logistics uses:
- These junctions lack the essential infrastructure to support decarbonisation of logistics; and
 - They are poorly located for customer service fulfilment centres or cross-dock facilities due to their “extreme” levels of congestion with local traffic associated with the Nottingham, Derby and Mansfield-Ashfield urban areas, in contrast to successful distribution parks on otherwise underused and free-flowing motorway junctions.

Iceni response

- 4.18 Junctions 25-28 of the M1 lack direct access to a railway (which through electrification could facilitate decarbonisation). However, as noted by Council, there are no plans to electrify the railway line next to the single proposed strategic industrial allocation at Stanton Park. Other kinds of infrastructure to support decarbonisation explored in the NCOHLS (for example electric gantries over motorways) are still being developed and are not present at any potential industrial site in this area.
- 4.19 What however is equally relevant is that that particularly at the southern end – such as M1 Junction 25 – land is close to the existing Rail Freight Terminal at East Midlands Gateway. As explained above, it is 7 miles from M1 J25 to East Midlands Gateway, and there is therefore considerable potential for additional logistics development to operate as a satellite site to this, with the majority of the journey from East Coast ports undertaken by rail.
- 4.20 Many M1 motorway junctions experience congestion, but there remains demonstrable strong demand for logistics facilities along the motorway. Infrastructure investment may be necessary to support junction capacity, and congestion may be limited to certain times of day. In addition, the strong access to labour that is required for a site to be highly competitive for logistics use, will correlate strongly with proximity to larger urban areas. As a result, the presence of congestion should not automatically preclude a site from being considered for strategic industrial use.

Supply demand balance

- 4.21 The most recent supply demand position for strategic logistics is given in the September 2024 Greater Nottingham Employment Background Paper (EBP). This paper uses the 425 ha need figure from the NCOHLS. It then identifies a current supply position of 906,055 sqm, or around 253 ha.
- 4.22 The EBP supply includes 110,000 sqm at New Stanton Park. As noted earlier in this report, this site is poorly located with respect to the strategic road network, and recent reserved matters applications have not been delivering strategic logistics floorspace. As a result, there is substantial doubt as to whether this site will deliver strategic logistics space to the anticipated quantum or at all.
- 4.23 In addition, the EBP supply includes the 5.55 ha Land East of Lowmoor Road and the south-east portion of the draft J27 Ashfield allocation, both of which were assessed above as inappropriate for inclusion in a supply-demand calculation. Supply is included at Ratcliffe on Soar, on which delivery concerns are noted above.
- 4.24 Removing the sites which Iceni considers should not be included, and adding the Bennerley Coal Disposal site, supply amounts to 808,555 sqm, or around 255 ha of land. The table below illustrates the calculation of the unmet need after this supply, using plot ratios of between 0.3 and 0.35. Consistent with the EBP, it has been assumed that 10% of the unmet need may be met through redevelopment (noting a 10% - 20% range has been used in the EBP, but in the absence of capacity evidence 10% has been adopted here).

Table 4.2 Strategic logistics supply – demand balance

	Low	High
A: Total Need	1,270,000 sqm 362 - 423 ha	1,486,000 sqm 424 - 495 ha
B: Supply	808,555sqm (255 ha)	
C: Unmet need (A – B)	461,445 sqm 108 – 168 ha	677,445 sqm 170 – 240 ha
D: Assume that 10% of remaining demand could be met from redevelopment	46,145 sqm	67,745 sqm
E: Residual unmet need (C – D)	415,300 sqm 97 – 152 ha	609,700 sqm 153 – 216 ha

Note intermediate values have been rounded in this table

- 4.25 This calculation leaves **a residual unmet need for between 97 - 216 ha of strategic logistics land** across the study area, depending on the demand scenario and plot ratio used.

- 4.26 This constitutes a significant remaining unmet need along the M1 corridor through the Nottingham HMA. Strategic sites like J25 of the M1 could have a key role in meeting this need, noting their high level of competitiveness and suitability for strategic industrial uses.

5. CONCLUSION

5.1 As noted throughout this report, Iceni considers the NCOHLS to be the most current and comprehensive evidence base available on strategic logistics needs in the Nottingham HMA. While the NCOHLS was prepared in compliance with the PPG and in co-operation with all relevant authorities, the Council's note is a unilateral critique which does not appear to have been informed by either market evidence or engagement with the Council's DfC partners and with a limited analytical scope which should be given little or no weight.

5.2 As detailed in the previous chapters, Iceni notes the following concerns with Council's arguments:

- The Council base their argument that Iceni has overstated strategic logistics demand on Erewash and the Nottingham HMA falling outside of the Golden Triangle. The NCOHLS and this report demonstrate high levels of strategic logistics demand along the M1 corridor and a market area which extends to include M1 J25.
- The Council state that the drivers of strategic logistics present at the time of writing of the NCOHLS are no longer present, undermining future need assessments. This is not the case, with the e-commerce market share still growing (albeit more slowly than pre-pandemic), and a range of other drivers evident, which the Council has not considered, and evidence of a strong ongoing need for modern strategic logistics facilities.
- In contrast to the Council's claims of a weak market for strategic logistics indicative of a lack of demand, rents have continued to rise and take-up has been strong. While available floorspace have risen recently, they only constitute a few years of supply at current take-up rates, and they are partly caused by companies moving to new and modern stock (which is consistent with an ongoing need for such stock to be developed). The supply of good quality modern space remains limited.
- Iceni disagree with Council's reassessment of the quantitative need for strategic logistics space in the study area, and continues to consider 1,270,000 – 1,486,000 sqm to be the best estimate for likely strategic industrial need.
- Several of the additional supply sites Council cites are inappropriate for strategic logistics use, or have significant constraints on their delivery. While Council found that the need for strategic logistics space was met by this additional pipeline, Iceni have found that there is a remaining unmet need of 191 – 309 ha and an urgent need to bring forward additional well-located supply close to the M1.

5.3 Given the discussion presented in this report, Iceni considers there to be strong prospects for strategic logistics in the M1 corridor of the Nottingham HMA as well as a significant unmet floorspace

need. J25 is a strategic site within the opportunity areas identified in the NCOHLS, and could make a substantial contribution to meeting the substantial extant unmet need.

A4. REPRESENTATIONS ON THE EREWASH GREEN BELT REVIEW



Bostocks Lane, Erewash

Representations on the Erewash Green Belt Review May 2025

Introduction

1. Iceni Projects ('Iceni') have been instructed by GLP to undertake a review of Erewash Borough Council's evidence base in relation to Green Belt. This note has been prepared by Iceni's Landscape Team, who have significant experience in this area. GLP are promoting the land west of Bostocks Lane in Long Eaton for strategic logistics development (the 'Site'). The Erewash Green Belt Review was published in March 2025 following a recommendation from the Planning Inspector appointed to examine the Erewash Core Strategy Review. The Green Belt Review is accompanied by an 'Approach to Review / Methodology' document.
2. The Erewash Core Strategy Review was submitted for examination in November 2022 and is therefore being examined under the 2021 NPPF. Therefore, it does not directly deal with grey belt and references to the NPPF below refer to the 2021 Framework, not the December 2024 version.

Summary of Recent Changes to Green Belt Policy and Guidance

National Planning Policy Framework ('NPPF')

3. The 2021 version of the NPPF was published in July 2021. Section 13 of the NPPF concerns the protection of Green Belt land. Paragraph 137 highlights that the Government attaches great importance to Green Belts, adding that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.
4. Paragraph 138 defines the five purposes of the Green Belt, which are:

'a) to check the unrestricted sprawl of large built-up areas;

b) to prevent neighbouring towns merging into one another;

c) to assist in safeguarding the countryside from encroachment;

d) to preserve the setting and special character of historic towns; and

e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.'
5. Paragraph 140 states that once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of

plans. It notes that strategic policies should have regard for the intended permanence in the long term of Green Belt boundaries.

6. Paragraph 142 highlights that strategic policymaking authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt, or towards locations beyond the outer Green Belt boundary. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.
7. Paragraph 143 continues, stating that once Green Belts have been defined, local planning authorities should plan positively to enhance their beneficial use, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.
8. Paragraph 149 highlights that there are certain forms of development that are not inappropriate in the Green Belt. These include:
 - Buildings for agriculture and forestry;
 - The provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;
 - Limited infilling in villages;
 - Limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:
 - Not have a greater impact on the openness of the Green Belt than the existing development; or
 - Not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.
9. Paragraph 150 continues by stating that other forms of development are also not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it. These are:

- Mineral extraction;
- Engineering operations;
- Local transport infrastructure which can demonstrate a requirement for a Green Belt location;
- The re-use of buildings provided that the buildings are of permanent and substantial construction;
- Material changes in the use of land (such as changes of use for outdoor sport or recreation, or for cemeteries and burial grounds); and
- Development, including buildings, brought forward under a Community Right to Build Order or Neighbourhood Development Order.

National Planning Practice Guidance ('PPG')

10. Additions to the Green Belt Planning Practice Guidance ('PPG') were published in February 2025. The PPG provides guidance on how to assess the contribution of Green Belt land to the purposes of the Green Belt. This is particularly relevant to the identification of grey belt, which was introduced within the December 2024 NPPF. However, it provides clarifications and best practice for assessing the contribution of all Green Belt.
11. Paragraph 001 of the PPG reiterates that the review and alteration of Green Belt boundaries should take place, where necessary, as part of the plan making process.
12. Paragraph 002 highlights the importance of Green Belt Assessments to inform the review of Green Belt boundaries during the preparation or updating of a local plan. Green Belt Assessments should be informed by the guidance set out within the PPG. It is also noted that, when updating or preparing plans, authorities will need to consider whether any existing Green Belt Assessment remains up to date.
13. Paragraph 004 highlights how authorities should define the land to be assessed. It notes that in most cases it will be necessary for authorities to divide their Green Belt into separate assessment areas. The number and size of assessment areas can be defined at a local level and respond to local circumstances. However, the following principles will need to be considered:
 - *'when identifying assessment areas, authorities should consider all Green Belt within their Plan areas in the first instance;*
 - *to ensure any assessment of how land performs against the Green Belt purposes is robust, assessment areas should be sufficiently granular to enable the assessment of their variable contribution to Green Belt purposes;*

- *a small number of large assessment areas will not be appropriate in most circumstances – authorities should consider whether there are opportunities to better identify areas of grey belt by subdividing areas into smaller assessment areas where this is necessary (although the identification of grey belt does not need to be considered for the Erewash Core Strategy Review, the identification of smaller assessment areas is necessary for a meaningful review of Green Belt boundaries); and*
- *authorities should consider where it may be appropriate to vary the size of assessment areas based on local circumstances. For example, the assessment of smaller areas may be appropriate in certain places, such as around existing settlements or public transport hubs or corridors.'*

14. Paragraph 005 provides guidance on how the contribution of land should be assessed against purposes a, b and d. These are considered further in the following section. In relation to purpose a, it notes that villages should not be considered large built- up areas. It also notes that purposes b and d relate to towns, not villages.

15. Paragraph 008 highlights that Green Belt Assessments should also consider the extent to which release or development of Green Belt land would fundamentally undermine the purposes (taken together) of the remaining Green Belt across the plan area as a whole i.e. how the release or development of the Green Belt land would affect the ability of all the remaining Green Belt across the area of the plan from serving all five of the Green Belt purposes in a meaningful way.

16. Paragraph 013 notes that judging the openness of Green Belt land depends upon the circumstances of the case. The guidance notes that there are a number of factors to consider, and sets out three examples which include, but are 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.'*

Comments on the Erewash Green Belt Review (2025)

Green Belt Assessment vs Green Belt Review

17. With reference to paragraph 002 of the Green Belt PPG, local authorities should produce a Green Belt Assessment prior to undertaking a Green Belt Review. It is worth highlighting here the difference between Green Belt Assessments and Green Belt Reviews. The main function of Green Belt Assessments is to assess the relative performance of the Green Belt in relation to the five purposes.

A Green Belt Review, on the other hand, looks at the need for areas to be removed or added from the Green Belt, usually to accommodate development. A Green Belt Review should be informed by a Green Belt Assessment.

18. The current Erewash Green Belt Review (2025) is not a Green Belt Review, as it does not make any comment on the removal or addition of Green Belt. Furthermore, it is not clear how the Review has informed policy decisions around Green Belt release. There is no cross reference with it within the Sustainability Appraisal, nor is there any mention of Exceptional Circumstances.
19. The 'Review' is more similar to a Green Belt Assessment; however, it has adopted an unusual methodology which does not align with best practice. Paragraph 002 of the PPG notes that authorities must consider whether any existing Green Belt Assessment remains up to date. We would note that Erewash does not have an up to date Green Belt Assessment, with the previous Nottingham-Derby Green Belt Review (2006) being the only available evidence relating to Green Belt.
20. As such, it is recommended that an updated Green Belt Assessment is undertaken, followed by a Green Belt Review. The Assessment should follow the guidance published in the PPG and take note of methodology recommendations discussed below. Once this is complete, a Green Belt Review can take place which identifies suitable areas for removal from / addition to the Green Belt.

Methodology

21. Paragraph 002 of the PPG notes that Green Belt Assessments should be informed by the guidance contained within the PPG. The Review does not follow the PPG and therefore should not be considered up to date. Furthermore, we have a number of concerns relating to the methodology used to undertake the Review, which are summarised below.

Ordering of Assessment and Numbering

22. The Review re-numbers and re-orders the purposes of the Green Belt with purpose b (to prevent neighbouring towns merging into one another) labelled as purpose 1 and assessed first. Purpose c (to assist in safeguarding the countryside from encroachment) is labelled purpose 2, and purpose a (to check the unrestricted sprawl of large built up areas) is assessed as purpose 3. It is recommended that the alphabetical labelling and ordering applied within the NPPF are used within the assessment for clarity and easy cross referencing with the PPG. For clarity, reference to purposes from here forth will make use of the NPPF alphabetical labelling.

Study Parcels

23. The Council's Green Belt Review utilises an unusual approach when dividing Green Belt land into study parcels. It is typical of Stage 1 Green Belt Assessments to undertake a strategic review of an authority area's Green Belt, usually splitting the Green Belt into wider parcels which are assessed against each Green Belt purpose. Stage 2 and sometimes Stage 3 assessments, often follow a

Stage 1 assessment and break parcels down into a more granular scale. This allows for a more meaningful assessment to be made of Green Belt function to therefore identify poorly performing land prior to the review of boundaries.

24. The PPG notes that when defining land to be assessed, the following principles must be considered. Below each point, we made commentary on the approach taken within the Erewash Green Belt Review.

- *'When identifying assessment areas, authorities should consider all Green Belt within their Plan areas within the first instance;*

Although all Green Belt land is considered within the plan area for purpose c, not all Green Belt is considered within the corridors identified for purpose b, and a very small proportion of Green Belt land is assessed against purpose a. We consider this to be a selective approach to assessing Green Belt, amplifying the contribution of some areas and downplaying where Green Belt does not contribute.

- *To ensure any assessment of how land performs against the Green Belt purposes is robust, assessment areas should be sufficiently granular to enable the assessment of their variable contribution to Green Belt purposes;*

The scale of assessment parcels for purpose a allows for a granular level of assessment suitable for the identification of boundary changes. However, the methodology states that *'land surrounding each settlement will be subject to granular analysis, with particular focus on the ability of the current Green Belt designation adjoining a settlement to check urban sprawl... each of the above factors will be assessed around the entirety of a settlement which abuts Green Belt.'* This has not been done, and instead the Council has taken a selective approach by only identifying some Green Belt parcels around settlements.

- *A small number of large assessment areas will not be appropriate in most circumstances – authorities should consider whether there are opportunities to better identify areas of grey belt by subdividing areas into smaller assessment areas where this is necessary; and*

When assessing purposes b and c, a small number of large assessment areas were used, with only 15 strategic parcels identified to assess purpose c, and seven strategic parcels / corridors used to assess purpose b.

- *Authorities should consider whether it may be appropriate to vary the size of assessment areas based on local circumstances. For example, the assessment of smaller areas may be appropriate in certain places, such as around existing settlements or public transport hubs or corridors.'*

A more granular scale has been applied when considering contribution to purpose a, which is welcomed. However, this approach is flawed due to the selective approach of identifying

parcels around settlements, as opposed to assessing all land around settlements and all land within the borough's Green Belt.

25. The identification of Countryside Units used to assess purpose c have been defined using only motorway and A roads, or settlement edges where relevant. This has led to the creation of huge swathes of Green Belt consisting of varied land uses and landscape character within a single assessment area. This makes it impossible for a useful assessment of Green Belt function to be undertaken due to the variation in character and context across the Countryside Unit.
26. It is agreed that when identifying assessment areas, clearly identifiable physical and likely permanent features should be used to define parcel boundaries, as reiterated by NPPF paragraph 143. However, other natural and man-made features such as roads, railway lines and watercourses form suitable features to define boundaries. The Council's supporting methodology states that features other than motorways and A roads form part of an area's rural character. Although we do not disagree with this statement, it is not relevant when identifying Green Belt boundaries.
27. When it comes to assessment areas relevant to purpose b, these comprise a confusing assortment of straight lines between an arbitrary collection of points. Not only does this approach focus upon physical separation of towns, as opposed to physical and visual separation, but it creates poorly defined Green Belt assessment areas where boundaries cross through the landscape.
28. Poorly defined assessment areas also exist in the assessment against purpose a, where buffers have been applied to some settlements, including Ilkeston and Derby. This creates assessment areas which cross through fields on the edge of the settlement, allowing for no meaningful assessment of potential areas for Green Belt release.
29. Overall, it is recommended that assessment areas are re-drawn using areas of similar character or land use to define the broad area, then boundaries are defined using clearly identifiable, recognisable features that are likely to be permanent, including roads, railways, watercourses, woodland blocks, or public rights of way. Where more prominent features don't exist, walls, hedgerows and ditches can be used to align Green Belt boundaries. In some instances, settlement edges, including the rear gardens of properties, may need to be used.
30. The size of assessment areas should be of a scale which is granular enough to understand the varying performance of Green Belt land, and in turn allow for a meaningful review of boundaries. Variations in scale is acceptable, and it is expected that smaller parcels will be identified in proximity to towns and other settlement edges, whilst larger assessment areas will be defined within the central areas of the Green Belt, i.e. away from settlement edges. Furthermore, assessment areas should be a 'one size fits all' and be assessed against all purposes of the Green Belt.

Contribution Levels

31. As noted within paragraph 005 of the PPG, assessments of the contribution of Green Belt land towards the five purposes of the Green Belt should be accompanied by an overall judgement, which is typically demonstrated through a verbal scale. This is custom for Green Belt Assessments and, since the publishing of the PPG, should follow the scale of 'Strong', 'Moderate', 'Weak' and 'None'. By providing a judgement, it allows for a transparent and clear narrative to be presented.
32. The Review's methodology provides no defined scoring for contribution, and no judgements are made in the assessment itself. Instead, the Review provides a commentary which comes to no practical conclusions. A map is presented at the end of the report showing areas which 'fulfil' all three purposes and those areas which do not. This is discussed in more detail below, however, there is no methodology or justification provided alongside this map. Overall, the Council's current approach provides very limited transparency as to the actual conclusions of the Review.
33. It is recommended that the study's methodology is significantly revised and the assessment rewritten based off the PPG's guidance in paragraph 005, which is summarised below.

Table 1: Purpose A – to check the unrestricted sprawl of large built up areas

Contribution	Illustrative Features
Strong	<p>Assessment areas that contribute strongly are likely to be free of existing development, and lack physical feature(s) in reasonable proximity that could restrict and contain development.</p> <p>They are also likely to include all of the following features:</p> <ul style="list-style-type: none"> • be adjacent or near to a large built up area • if developed, result in an incongruous pattern of development (such as an extended "finger" of development into the Green Belt)
Moderate	<p>Assessment areas that contribute moderately are likely to be adjacent or near to a large built up area, but include one or more features that weaken the land's contribution to this purpose a, such as (but not limited to):</p> <ul style="list-style-type: none"> • having physical feature(s) in reasonable proximity that could restrict and contain development • be partially enclosed by existing development, such that new development would not result in an incongruous pattern of development • contain existing development • being subject to other urbanising influences
Weak or None	<p>Assessment areas that make only a weak or no contribution are likely to include those that:</p> <ul style="list-style-type: none"> • are not adjacent to or near to a large built up area • are adjacent to or near to a large built up area, but containing or being largely enclosed by significant existing development

Table 2: Purpose B – to prevent neighbouring towns merging into one another

Contribution	Illustrative Features
Strong	<p>Assessment areas that contribute strongly are likely to be free of existing development and include all of the following features:</p> <ul style="list-style-type: none"> • forming a substantial part of a gap between towns • the development of which would be likely to result in the loss of visual separation of towns
Moderate	<p>Assessment areas that contribute moderately are likely to be located in a gap between towns, but include one or more features that weaken their contribution to this purpose, such as (but not limited to):</p> <ul style="list-style-type: none"> • forming a small part of the gap between towns • being able to be developed without the loss of visual separation between towns. This could be (but is not limited to) due to the presence or the close proximity of structures, natural landscape elements or topography that preserve visual separation
Weak or None	<p>Assessment areas that contribute weakly are likely to include those that:</p> <ul style="list-style-type: none"> • do not form part of a gap between towns, or • form part of a gap between towns, but only a very small part of this gap, without making a contribution to visual separation

Table 3: Purpose D – to preserve the setting and special character of historic towns

Contribution	Illustrative Features
Strong	<p>Assessment areas that contribute strongly are likely be free of existing development and to include all of the following features:</p> <ul style="list-style-type: none"> • form part of the setting of the historic town • make a considerable contribution to the special character of a historic town. This could be (but is not limited to) as a result of being within, adjacent to, or of significant visual importance to the historic aspects of the town
Moderate	<p>Assessment areas that perform moderately are likely to form part of the setting and/or contribute to the special character of a historic town but include one or more features that weaken their contribution to this purpose, such as (but not limited to):</p> <ul style="list-style-type: none"> • being separated to some extent from historic aspects of the town by existing development or topography • containing existing development • not having an important visual, physical, or experiential relationship to historic aspects of the town

Weak or None

Assessment areas that make no or only a weak contribution are likely to include those that:

- do not form part of the setting of a historic town
- have no visual, physical, or experiential connection to the historic aspects of the town

Methodology for purpose a – to check the unrestricted sprawl of large built up areas

34. The assessment wrongly identifies all inset settlements as large built up areas. The methodology states that *'the Planning Inspector has instructed the Council to consider the appropriateness of housing growth in rejected tiers of the settlement hierarchy. This includes the extension of rural area settlements (Villages) into the Green Belt. To understand the level of impact any housing growth planned as part of this tier would have, assessment of the effectiveness of Green Belt to check the unrestricted sprawl around each village is necessary'*. This directly contradicts the PPG which states *'this purpose relates to the sprawl of large built up areas. Villages should not be considered large built up areas.'* As such, the only two settlements that should be assessed as large built up areas within Erewash itself would be Ilkeston and Long Eaton, not villages such as Breaston. With reference to Table 2, assessment areas which are not adjacent or near to a large built up area, cannot be assessed as contributing towards purpose a.
35. The accompanying methodology provides little clarity on how assessment areas have been evaluated as contributing towards purpose a. A list of factors has been provided, including:
- General pattern and form of land;
 - Field networks;
 - Degree of enclosure;
 - Notable landscape characteristics;
 - Physical features on the ground (roads, watercourses, railways lines, woodland)
 - Recent expansions of settlements and prevalence of modern development; and
 - The availability of defensible and permanent boundaries.
36. There is little evidence of these being applied to the assessment areas and without a clear methodology, it is impossible to tell how they have informed judgements. There appears to be confusion regarding the overarching aim of purpose a. Where 'assessment areas' have been found to make a limited contribution, it appears the argument of 'rounding off' the settlement form is the main reason for this judgement. Settlement form, although contributes towards the overall judgement of purpose a, is not a reason in itself and instead points towards planning by 'birds eye view'.

37. Overall, the 'judgements' made in relation to purpose a appear to be inconsistently applied and out of line with the PPG. It is recommended that a robust methodology which aligns with the PPG is formulated and applied to assessment areas which cover the entire Green Belt, not just select parcels on the edge of settlements. Within this methodology, the confirmed definition of large built up areas must be considered.

Methodology for purpose b – to prevent neighbouring towns merging into one another

38. The assessment methodology for purpose b makes use of the previous methodology of the Nottingham-Derby Green Belt Review as a starting point. This was undertaken in 2005 and is therefore considered to be out of date. Instead, the assessment should make use of the guidance set out within the PPG which is considered current best practice.
39. The unusual identification of assessment areas / corridors in relation to purpose b is covered earlier. We would encourage the Council to re-visit the assessment of purpose b using the assessment area recommendations made previously. Furthermore, the PPG guidance should be applied which focuses on both physical and visual separation, as opposed to geometric corridors with no clearly defined boundaries. This approach once again points towards planning by 'birds eye view' as opposed to a genuine understanding of landscape character and visual context.

Methodology for purpose c – to assist in safeguarding the countryside from encroachment

40. Commentary on the scale and definition of Countryside Units used to assess contribution to purpose c has been discussed previously. The Countryside Units are generally large in scale, meaning there is a varied character and land use across them. Often these extend from the edge of towns and large built up areas, and across open countryside. The varied character of these strategic parcels means the true contribution of the Green Belt cannot be determined, as a similar judgement cannot be applied across the whole strategic area.
41. Similarly to the other purposes, the assessment of purpose c is not accompanied by a clear and transparent methodology. The assessment of each Countryside Unit provides more of a narrative than an assessment and the overall conclusion for each Unit is either 'development in this Countryside Unit would encroach on the countryside', or 'development in this Countryside Unit would not encroach on the countryside'. Considering the scale of these units, this black or white approach is wholly unsuitable, nor is it helpful in identifying discrete areas along settlement edges which may be performing poorly.
42. Although the PPG does not provide guidance on the assessment of contribution to purpose c, an assessment framework similar to that below could be used.

Strong Contribution

Land which makes a strong contribution to purpose c is likely to be rural in character and undeveloped. There is likely to be an existing strong settlement edge and no other equally as strong potential boundaries in reasonably proximity.

Moderate Contribution

Land which makes a moderate contribution to purpose c is likely to be predominantly rural in character and undeveloped with some urbanising influences. There is likely to be an existing clearly identifiable settlement edge, however other potential identifiable boundaries occur in reasonable proximity.

Weak Contribution

Land which makes a weak contribution to purpose c is likely to be mostly or partly developed and/or not characteristic of rural countryside due to urbanising influences. The settlement edge could be well defined or not well defined, however, clearly identifiable potential boundaries will occur in reasonable proximity.

No Contribution

Land which makes no contribution to purpose c is likely to be clearly developed. Strong boundaries exist which would form a new settlement edge and Green Belt boundary.

Lack of Conclusions

43. As indicated previously, the assessment provides no judgements on Green Belt contribution and doesn't come to a clear conclusion on areas where the Green Belt boundary should be reviewed. The conclusion is limited to a map which indicates whether land 'fulfils' all three functions, or whether it fulfils one or two functions. This is misleading, as most of the borough was not assessed under purpose a. It would be argued that areas within the centre of the borough away from large built up areas cannot contribute towards purpose a. The methodology or report doesn't clarify what 'fulfil' means. This could indicate anything from a weak to strong contribution towards a Green Belt purpose. Without any judgements on contribution, it is very difficult to determine what areas would be suitable for Green Belt boundary review.

Performance of the Site

44. The Site is located to the west of Bostocks Lane in Long Eaton within the administrative boundary of Erewash Borough Council. The Site is positioned to the immediate west of the M1 and the immediate south of the A52, with the interchange between these two roads marking the north-east corner. The Site comprises approximately 31ha of land which is predominantly farmland, alongside agricultural buildings, two residential dwellings and yards used as a waste management business. The two residential dwellings include the farmhouse of Wilsthorpe Lodge Farm and a bungalow. Vehicular access to the Site is taken from a single-track bridge which crosses the M1 leading westwards from Bostocks Lane. GLP are promoting the Site for strategic logistics development.
45. The Erewash Green Belt Review indicates that the Site 'fulfils' all three of the Green Belt purposes assessed as part of the Review, purposes a, b and c. We would agree that the Site fulfils some role in all three of these purposes, however, would argue that an updated Green Belt Assessment which

follows the PPG would identify the the land as not strongly contributing towards any Green Belt purpose. The below commentary supports this statement.

Assessment against purpose a – to check the unrestricted sprawl of large built up areas

46. The Site is located on the opposite side of the M1 from Long Eaton to the east and the opposite side of the A52 from Sandiacre to the north, both of which could be described as large built-up areas. Therefore, the Site makes some contribution towards preventing sprawl of large built-up areas. The Site contains some existing development around Wilsthorpe Lodge Farm, which reduces the local openness of the Green Belt. This also reduces the significance of the Site's role in checking the unrestricted sprawl of large built-up areas. The development at Wilsthorpe Lodge Farm, although formerly rural in character as a farm, has evolved in its uses and now represents more of an edge-of-settlement character, and is therefore reflective of sprawl.
47. The Site is physically and visually separated from the large built-up areas of Long Eaton and Sandiacre due to the M1 and A52, which also provide clear settlement boundaries. Furthermore, dense belts of trees and vegetation to the north and east of the Site provide containment and reinforce this visual and physical separation. The M1 forms an existing clearly identifiable physical settlement and Green Belt boundary, however, other recognisable and likely permanent Green Belt boundaries exist in the form of the hedgerow and PRoW which mark the Site's western boundary. Overall, the Site is considered to make a moderate contribution towards purpose a of the Green Belt, as although it is in proximity to a large built area, there are physical features in reasonable proximity that could restrict and contain development, the Site contains existing development, and it is subject to urbanising influences from the adjacent M1 and A52.

Assessment against purpose b – to prevent neighbouring towns from merging into one another

48. The Site forms a very small part of a wide gap between the towns of Long Eaton in the east and Derby in the west. The Site makes no contribution towards the visual separation of the two towns and its development would have no material effect on the perceived separate identities of the towns. Overall, the Green Belt at the Site is considered to make a weak contribution towards purpose b.

Assessment against purpose c – to assist in safeguarding the countryside from encroachment

49. The Site consists of pastoral and hay fields and is therefore, in part, considered as countryside. However, existing development on Site diminishes this character somewhat and reduces local openness. The Site's position adjacent to the M1 and A52 further reduce the rural character and any sense of tranquillity. This is recognised in the Council's own evidence base which divides Countryside Units by motorway and A roads due to the '*consequence of the visual prominence these typically make as they run through the landscape*'. The Site benefits from well vegetated boundaries that contain it from the wider countryside. Overall, the Site is considered to make a weak contribution towards purpose c.

Assessment against purpose d – to preserve the setting and special character of historic towns

50. The Site does not lie within or adjacent to a historic town, nor does it play any role in the setting or special character of a historic town. It therefore makes no contribution towards purpose d.

Assessment against purpose e – to assist in urban regeneration, by encouraging the recycling of derelict and other urban land

51. The Council does not have sufficient non-Green Belt land to accommodate identified needs. The Site contains some previously developed land at Wilsthorpe Lodge Farm.
52. Overall, with reference to the PPG and suggested methodology for purpose c contained above, the Green Belt at the Site does not make a strong contribution towards any purposes of the Green Belt. Overall, it is considered to make a moderate contribution to purpose a, a weak contribution to purpose c, and no contribution to purposes b and d. Although it is recognised that the Site makes some contribution towards the Green Belt, and even if an appropriate Green Belt Review identified other parcels that make less of a contribution to the purposes of the Green Belt, its specific locational advantages should be considered when judging whether to release the Site from the Green Belt. Its location immediately adjacent to the M1 junction means it is the most suitable and sustainable location for a strategic logistics development and, therefore, the Council could reasonably make a decision to release the Site on this basis.

Conclusion and Recommendations

53. Overall, we consider the Council's Green Belt Review to fall short of its role as a Green Belt Review, as it does not identify suitable locations for amendments to the Green Belt boundary to accommodate development need. The Review is more like a Green Belt Assessment; however, its methodology is confused and does not align with best practice. The Review does not comply with the PPG, and, as such, should be considered out of date.
54. The Council should re-visit their Green Belt evidence by firstly undertaking a Green Belt Assessment. This should use a revised methodology which aligns with that presented within the PPG. The approach to identifying assessment areas should be reviewed and a scale adopted which is sufficiently granular to allow for comprehensive judgements to be made across all Green Belt purposes. The Green Belt Assessment must be accompanied by clear judgements on contribution. The Green Belt Assessment should be accompanied by a Green Belt Review, which makes use of the conclusions of the Assessment to assist in the identification of locations for adjustments to the Green Belt boundary to accommodate development need.
55. Green Belt is a complex concept and evidently plays a fundamental role in shaping local plans. We recommend that the Council ensures that their Green Belt Assessment and Green Belt Review is undertaken by a suitably qualified and experienced professional, in accordance with relevant guidance and industry standards.