

Option for Consultation Report of Responses March 2011

(Partially updated November 2011
to refer to the Housing Provision
Position Paper and Climate
Change Consultation)

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1 Introduction

1.1 The councils of Ashfield, Broxtowe, Erewash, Gedling, Nottingham City and Rushcliffe are working with Derbyshire and Nottinghamshire County Councils to prepare a new aligned and consistent planning strategy for Greater Nottingham. Greater Nottingham consists of the administrative areas of all the local authorities, except for Ashfield, where only the Hucknall part is included. Ashfield are therefore preparing a single Core Strategy for the whole of their area, but working closely with the other greater Nottingham Councils to ensure consistency.

1.2 The Aligned Core Strategies will be the key strategic planning documents for Greater Nottingham and will perform the following functions:-

- Define a spatial vision for Greater Nottingham to 2028;
- Set out a number of spatial objectives to achieve the vision;
- Set out a spatial development strategy to meet these objectives;
- Set out strategic policies to guide and control the overall scale, type and location of new development (including identifying any particularly large or important sites) and infrastructure investment; and
- Indicate the numbers of new homes to be built over the plan period.

1.3 The Aligned Core Strategies Option for Consultation document was published in February 2010 for an eight-week period of consultation.

1.4 All comments received during this consultation period have been carefully considered by the councils. The comments have been used to prepare the next draft of the Aligned Core Strategies, known as a Publication Draft. Whilst all views are taken into account it is not possible to meet everyone's wishes and aspirations. Difficult choices have to be made to arrive at a strategy which meets all the needs of the area.

1.5 The remainder of the document takes each chapter or policy of the Core Strategies Options for Consultation document in turn and sets out an overview of the responses received to the consultation exercise. The overview is intended to draw out the key issues raised (rather than addressing technicalities and matters of detail) in order to be taken forward, and discussed, through the rest of the Aligned Core Strategies drafting process. There were a few occasions where the consultation responses were factually incorrect or unsupported by available evidence and as such little weight could be given to them in policy wording development. However, many others will be taken into account in the preparation of the Publication Draft document. The key points arising from the consultation exercise that have been taken into account are summarised at the end of each chapter.

1.6 The Councils have endeavoured to reflect the responses made, but reference should be made to the original representations for the full details. The following overview of consultation responses by chapter does not seek to offer individual responses to the comments raised. The names of organisations and individuals who made comments on that section of the Option for Consultation are listed at the end of each chapter.

1.7 This document summarises only those comments made formally through the consultation process. However, it should be emphasised that there were a large number of other methods by which comments were gathered by the Greater Nottingham councils. These included workshops with business representatives, school children, consultation bodies and stake holders; displays at community events etc. In addition, two of the councils (Ashfield and Gedling) have previously consulted on Issues and Options for their areas and comments made to these earlier consultations will also be taken into account when drafting the next stage.

1.8 The Coalition Government has announced its intention to make a number of changes to the Planning System to introduce a more 'localist' approach through the Localism Bill with greater control over planning matters at a local and neighbourhood level. These changes will include the removal of the East Midlands Regional Plan from the Development Plan. The Publication Draft of the Aligned Core Strategies reflect those changes.

2 General Comments, Vision and Objectives

General Comments

2.0.1 There was general support for aligning the process of Core Strategies preparation across a meaningful area as this allows for joined up thinking. However, there were also a number of comments in support of a formal Joint Core Strategy. The concept of 'Greater Nottingham' was not supported by some, especially in Erewash and Derbyshire who fear a loss of local identity and a 'take over' by Nottingham. A number of respondents also felt that the document failed to provide the confidence that there is sufficient and significant political support and agreement on the Aligned Core Strategies process. Additionally, a number of respondents questioned the lack of contingency scenarios if one of more of the authorities decided not to implement its part of the Aligned Core Strategies.

2.0.2 There were a number of objections to the content of the document, especially the housing numbers and potential impact on transport infrastructure (notably the A46, A52 and A453). Respondents were of the opinion that the housing numbers were too high, failed to take account of the economic circumstances and were not supported by data on population growth. Other respondents referenced the need to ensure good quality agricultural land, maintain the character of villages and protect the principle role of the Green Belt in stopping coalescence. There was also opposition to the distribution of development from those who felt that there should be more of an even spread across towns and villages, from those opposed to the Workplace Parking Levy and from those who felt that affordable housing could lead to higher crime rates and lower house prices.

2.0.3 In Erewash there was support for the regeneration of Stanton provided the character of surrounding villages was protected. There was also support for substantive additional housing growth at Long Eaton as it benefits from a strong infrastructure base.

2.0.4 There were a number of comments regarding the style of the document and the process used to this point. There was a view that the document used too much jargon and too many acronyms and the use of 'plain English' was supported. There was also a view that there has been insufficient public consultation and that the process is too long meaning only those with a specific interest will see it through and the process should be speeded up.

2.0.5 A number of respondents identified gaps or omissions in the document. These included:

- The lack of identified funding for proposals
- The lack of reference to Mineral Safeguarding Areas as required by Mineral Policy Statement 1
- The lack of policies related to Hazardous Installations, pipelines on other similar facilities
- Adequate reflection of PPS5 :Planning for the Historic Environment and the accompanying practice guide
- Consideration of the 'what ifs' in case the strategy is undeliverable for any reason

- The lack of a Monitoring Framework using appropriate targets and indicators to provide timely trigger mechanisms
- Lack of reference to Grantham being a designated Growth Point

2.0.6 There were a number of comments intended to help guide the Local Authorities through the process. The focus of the document should be on 'place shaping and delivery' and the Vision should 'tell the story'. The Core Strategies should set the agenda and be clear about where tough decisions need to be taken especially about whether identified sites are allocations or not. The grouping of draft policies under headings is useful but the policies should be more focused on place and locally distinctive. The evidence base does not need to be complex or over detailed and should be clearly signposted throughout the document. The locally distinctive sections should be more consistently and clearly presented and it would be beneficial to identify the differing circumstances of Erewash that have resulted in the inclusions of a vision here but not for the other districts.

Key Diagram/Maps

2.0.7 There was general support for the key diagram although there were a number of comments. Respondents were split over the Green Belt issue with a number believing that it was drawn too tightly around the urban areas and others who stated that housing should not be promoted on Green Belt land. Both Whyburn Farm and Top Wighay Farm should be included on the map as Sustainable Urban Extensions with the employment land at Top Wighay Farm being shown. Green Infrastructure including strategic corridors, all sites important for nature conservation and the British Waterways network should also be shown.

Vision and Objectives

Vision

2.0.8 There was general support for the Vision with a number of comments on its content. However Government Office for the East Midlands (GOEM) felt that the Vision was too site specific when compared to the Objectives which were not locally distinct enough.

2.0.9 Green Infrastructure and heritage were identified by some respondents as being areas where the Vision could be improved. The view was that more emphasis could be given to Green Infrastructure connections in both the vision and sections on local distinctiveness. Equally, the contribution to local distinctiveness made by heritage was seen to be underplayed in the document and the Vision could be more aspirational in respect of the historic environment.

2.0.10 The intention to address climate change was welcomed although it was felt that there was a need to recognise wider issues such as the need to reduce carbon emissions by reducing travel demand and effecting a modal shift. The role of smaller developments and the existing building stock in contributing to carbon neutrality should also be emphasised more.

2.0.11 The economy was seen as an important issue by many with some respondents seeing job creation as an overwhelming factor for the Vision which should give equal emphasis to employment and housing. While the references to the 'knowledge economy' and the Science City objectives were seen as appropriate by some, the economic health of the area will continue to be based on a wider spectrum of businesses. The role of the City Centre was highlighted by a number of respondents who sought to ensure that its regional role and the contribution Broadmarsh and Victoria Centres play are clearly identified in the Vision. However, a number also raised the tensions between growth in the suburbs and lack of investment in the City and the need to support and enhance rural economies.

2.0.12 Transport was also an issue which was raised by respondents. There was support for the emphasis placed on public transport, including bus, rail and tram and the need to integrate such provision with new developments. However, the role rail could play, especially the scope for new stations, was felt to be underplayed and the provision of public transport in rural areas was seen to be an issue.

2.0.13 Again the release of Green Belt land for housing was objected to by some while others felt that certain sites, such as Whyburn Farm, should have been included in the Vision as sustainable urban extensions. While the aim of regeneration was supported by a number of respondents there was also a view that the role of Hucknall and Ilkeston as sub-regional centres has not been sufficiently followed through.

Objectives

2.0.14 Despite strong support for many of the objectives there was a view that they should clearly bring out what is locally distinctive about Greater Nottingham. A number of respondents wanted to place more emphasis on certain topics including sport, Green Infrastructure, water resources, community safety and health. A number of suggestions were received from consultees as to how these elements of the objectives could be enhanced.

2.0.15 In relation to the economy it was suggested that the objective should be widened to take account of the complementary nature of the area around the conurbation. The objective on town centres was not seen to be effective as there is a need to significantly enhance city centre shopping. There was also support for communities achieving high design and environmental standards, although one respondent felt that rebalancing the housing mix was political correctness gone too far.

Officer Response

2.0.16 Many comments here have been addressed through other changes to policies listed elsewhere in this report.

2.0.17 Strategic Green Infrastructure is now included on the Key Diagram. The Vision and Objectives have been recast to shorten the vision and make the objectives more spatially specific especially the housing objective, with more consistency and coherence introduced in the 'Local Distinctiveness' sections.

| Number of Comments | Number of Consultees |
|--------------------|----------------------|
| 406 | 99 |

List of Respondents

Alliance Planning, Andrew Martin Associates, Barratt Strategic/Westerman Homes Ltd, British Waterways, Capital Shopping Centres, CEMEX, Crown Estate, David Wilson Estates, Deancoast, Derbyshire and Peak District Transport 2000/2001/2002/2003, Derbyshire County Council, Derbyshire County, Primary Care Trust (PCT), Derbyshire Gypsy Liaison Group, Derbyshire Wildlife Trust, Derwent Living, Dr Richard Hyde, E Franks, East Midlands Development Agency, Elton Parish Council, English Heritage, Environment Agency, Government Office for the East Midlands, Green Squeeze, Health and Safety Executive, Holmes Antill, House Builders Federation (HBF), Hunter Page Planning, JS Bloor (Services Ltd), Kinoulton Parish Council Langridge Homes, Lower Bath Street Area Residents and Business Association, Mr Allan Kerr, Mr and Mrs Pratt, Mr Anthony Morris, Mr Charles Etchells, Mr David Alexander, Mr G Joseph, Mr Graham Kirby, Mr Grant Withers, Mr J and Mrs S Summers, Mr Jeremy Fenn, Mr Justin Mclarney, Mr Malcolm Varley, Mr Martin Truman, Mr Neil Trickey, Mr Nigel Perkins, Mr Paul Green, Mr Philip Champ, Mr Ray Barker, Mr Shyam Brahmhatt, Mr Tony Fisher, Mr. Richard Jefferson, Mr. T.C.Lindsay Simpson, Mrs Whitt, Mrs Ann Brereton, Mrs Christina Morgan, Mrs Deirdre Westwood, Mrs Fay Sexton, Mrs Gillian Chesney-Green, Mrs Joan Bennett, Mrs Kimberly B Cooper, Mrs Louise O'Donoghue, Mrs Marion Bryce, Mrs Shirley Dooley, Mrs Susan Ebbins, Ms Emma Parry, Ms Jill Pearson, Ms Karen Hodgson, Ms Lorraine Koban, Ms Pat Ancliffe, Ms. Peach, Nathaniel Lichfield and Partners, Natural England, NHS Nottingham City, Nottingham Action Group on HMOs, Nottingham City Council, Nottingham City Homes, Nottingham Trent University, Nottinghamshire County Council, Nottinghamshire County PCT, Nottinghamshire Police, Notts Wildlife Trust, Oakhill Group Ltd, Professor Neville Davies, Professor Robert, Radcliffe-on-Trent Golf Club, Rushcliffe CPRE, Sport England, Taylor Wimpey UK Limited, The Co-operative Group, The National Trust, The Theatres Trust, Tillbridge Developments LLP, Turley Associates, UoN Students Union, Victoria TRA, Wheeldon Brothers Ltd, Whitehead (Con) Ltd C/O IPlan Solutions, Wilson Bowden Development Ltd

3 Delivery Strategy

3.1 Climate Change

3.1.1 There was strong support for climate change as a principle that underlies the whole document, with mitigation and adaptation both acknowledged as important principles.

3.1.2 There was also generally strong support for policy aims from individuals and public sector organisations, such as Natural England although some respondents considered that the role of the natural environment in mitigating and adapting to climate change should be mentioned and the possible negative effects of climate change mitigation and adaptation on the character and appearance of the built and historic environment. Similar points were also raised by others who felt that there needed to be reference to the role of the natural environment in helping to alleviate the impacts of climate change and also the role of spatial planning in facilitating the adaptation of the natural environment to climate change.

3.1.3 The Government Office for the East Midlands (GOEM) recommend that the policy should provide clear justification to demonstrate both why the Greater Nottingham area needs to be different from national policy and that it is affordable in delivery (commercial viability) terms. GOEM also note that Supplementary Planning Guidance (SPG) should not be prepared with the aim of avoiding the need for examination of policy, and therefore reference to them for sites of around 500 homes is inappropriate. The table of CO₂ reduction targets should be part of the policy.

3.1.4 Comments from the development industry objected to the fact that policy goes beyond government targets on climate change, without any justification for the approach. There were concerns from a number of developers and the Home Builders Federation (HBF) about the negative affect on the viability of development, that the evidence base covers this only in a very generic sense, and relies on some questionable assumptions, e.g. continuing house price rises. The timetable to zero carbon has been negotiated between the house building industry and government and there is no justification for variance from this.

3.1.5 The development industry also commented on other additional burdens on development, such as affordable housing and infrastructure costs, which are likely to worsen the viability position. The policy needs to recognise that there may be judgements between which elements can be viably delivered – e.g. affordable housing or climate change mitigation. There are additional concerns expressed over the policy not being clear as to what it was trying to achieve and how it should be interpreted and concern over possibly more stringent standards for larger developments of ‘around 500 dwellings or more’. In addition, targets should not be set beyond 2016 and the policy needs to accommodate ‘allowable solutions’.

3.1.6 One commentator felt an understanding of the demand and supply potential for the use of renewable and low carbon energy should be the starting point of the policy. Opportunities are more appropriately considered at the site level rather than over the whole plan area. The policy should also clarify a number of terms, namely 'sustainable construction methods' and 'appropriate energy sourcing'.

3.1.7 In relation to flooding there was broad support for the inclusion of provision for Sustainable Drainage in policy from environmental groups such as the Wildlife trusts and the Environment Agency but concern that flooding from sources other than watercourses needed wider recognition in the policy. GOEM commented that Section 3 on Flood Risk appears to repeat national policy and as such would not seem to be necessary while some developers felt that limiting development in flood zone 3 to 'urban' could limit opportunities in and around Greater Nottingham.

Officer Response

3.1.8 The Policy has been redrafted to reflect many of the comments made, including a clarification of the approach to low and zero carbon energy sources, explaining the 'Merton rule' rather than being an approach that goes beyond Building Regulation requirements. Accordingly, it is also made clear that the Merton rule may be waived if equivalent carbon savings are made through alternatives.

3.1.9 Consistency has also been introduced between the methodology for working out low and zero carbon contributions to reducing carbon emissions from residential and non residential development, which should make the policy simpler to understand. The position in Erewash (Derbyshire) has also been clarified and simplified.

3.1.10 The Policy also now makes it clear that any approach to enhanced construction standards (eg requirement for development to meet higher level of Code for Sustainable Homes) will be set out in future Development Plan Documents, to allow for an Examination.

3.1.11 The flooding element of the policy has been amended to be locally distinctive, and now sets out factors to be taken into account when applying the PPS 25 Sequential test.

3.1.12 As this policy has changed substantially, it was subject to a further round of consultation during the summer of 2011. The results of that consultation, and the further changes made to the policy, are set out in the Report of Consultation on the Housing Provision Position Paper and the draft Climate Change Policy.

| Number of Comments | Number of Consultees |
|---------------------------|-----------------------------|
| 92 | 65 |

List of Respondents

Alliance Planning, Andrew Martin Associates, Ashfield District Council, Barratt Strategic/Westerman Homes Ltd, Bartons Public Limited Company, British Waterways, Butler, Campaign for Better Transport, Capital Shopping Centres, Commercial Estates Group (CEG), CPRE Derbyshire Branch, Crown Estate, Dale Abbey Parish Council, David Wilson Estates, Deancoast, Derbyshire County Council - Forward Planning, Derbyshire County Primary Care Trust (PCT), Derbyshire Gypsy Liaison Group, Derbyshire Wildlife Trust, Dr Richard Hyde, DTZ Piedad Consulting, East Midlands Development Agency (EMDA), English Heritage, Environment Agency, Erewash Borough Council, Foster, Government Office for the East Midlands, Green Streets West Bridgford, Heaton Planning Ltd, Holmes Antill, House Builders Federation (HBF), Indigo Planning, Langridge Homes, Miller Homes Limited, Mr Allan Kerr,

Mr and Mrs Brian Spencer, Mr G Joseph, Mr Paul Green, Mr Peter Lane, Mrs Christina Morgan, Ms. Peach, National Farmers Union - East Midlands, Natural England, Nottingham Action Group on HMOs, Nottingham City Council, Nottingham City Homes Nottinghamshire County Council, Nottinghamshire County Teaching Primary Care Trust, Nottinghamshire Police, Oakhill Group Ltd, Peel Environmental Limited, Greenwood Community Forest Partnership, Ramblers Association, Ruddington Parish Council, Rushcliffe CPRE, Shire Consulting, Taylor Wimpey Developments Ltd, The Co-operative Group, The National Trust, The University of Nottingham, Tillbridge Developments LLP, Wheeldon Brothers Ltd, Whitehead (Con) Ltd C/O IPlan Solutions, William Davis Ltd, Wilson Bowden Development Ltd

3.2 The Spatial Strategy

3.2.1 There were a range of comments regarding the overarching strategy set out in the policy. A number of respondents, including CPRE, commented that the time frame of the Aligned Core Strategies should be reduced to allow more flexibility in future housing provision. A time frame of 10 years was felt to be more appropriate. One of the key reasons for this was that the evidence base was seen to be flawed and based on outdated assumptions especially in relation to migration. Ashfield District Council also objected to the use of the SUE Study as the basis of the policy as it was not subject to public consultation and is now out of date.

3.2.2 Many respondents felt that the total housing target was too high and should be reduced. Members of the public were especially critical and felt that the proposals were developer led to satisfy speculative demand rather than those in greatest need. The approach to rural areas was also seen to require amendment with the inclusion of a settlement hierarchy supported by a number of respondents including GOEM.

3.2.3 The use of SUEs to help deliver the housing target was the subject of a number of comments. National Grid supported the strategy to concentrate all new development in and adjoining the existing settlements, but some developers also felt a strategy based on large urban extensions will be riskier in the current economic climate and would have high infrastructure requirements and long lead in times. Additionally, build out rates on large sites tend to be low, threatening delivery targets. An approach including a wider portfolio of sites was preferred.

3.2.4 The lack of identified SUEs in Broxtowe was highlighted as an important issue. Many respondents, including both developers and members of the public, considered that the Aligned Core Strategies could not be found 'sound' if Broxtowe did not identify SUEs.

3.2.5 Some developers also felt the requirement of PPS12 that Core Strategies be flexible and to show how contingencies will be dealt with, is not adequately addressed, especially if one or more large sites were delayed. One suggestion was to have higher provision levels to allow for this. The implementation of the Core Strategies should avoid being delayed or even prevented due to the late or non delivery of strategic transport infrastructure.

3.2.6 A number of respondents made comments regarding the distribution of housing around the conurbation. The level of development identified for Rushcliffe was questioned as it was much higher than for other Districts. Additionally, Trowell Parish Council felt that having three possible locations for growth in their area was unfair. Developers were broadly supportive of the level of growth and sub-regional distribution but a number of respondents considered that there should be greater flexibility in the split between the PUA and the non-PUA.

3.2.7 The impact of the policy on the Green Belt was also a source of comments especially from members of the public who highlighted the potential for settlements to coalesce along with the loss of productive agricultural land. Derbyshire Wildlife Trust were also concerned with coalescence between Derby and Nottingham and the loss of Green Infrastructure. One respondent identified that the existing tight Green Belt boundaries had led to the compact and sustainable nature of the city and that reviewing the boundaries would threaten this.

3.2.8 There was support for the inclusion of a strategic Green Belt review from Derbyshire City Council, Derbyshire Gypsy Liaison Group, Nottinghamshire County Council and GOEM. The HBF also felt that the existing approach to the review was a piecemeal way of dealing with an important issue. Overall it was felt that the review should include:

A clear decision on the status of 'white land'

The whole Green Belt and not just the inner boundaries

Small scale housing in villages

A robust methodology to decide on redrawing the Green Belt having regard to landscape, visual unity/condition, biodiversity and cultural assets

Accommodation of the remaining 8340 dwellings

3.2.9 There was support for the inclusion in the Policy of Green Infrastructure however Natural England felt that there should be reference to the 6Cs Green Infrastructure Strategy and links back to the natural environment as mentioned in the vision. Notts Wildlife Trust consider that all sites should be subject to full ecological assessments, biodiversity mapping or Green Infrastructure opportunity mapping prior to being identified in the plan to ensure that issues can be dealt with appropriately.

3.2.10 The British Horse Society note that the scale of growth will impact on the ability to keep horses and on the rights of way network. English Heritage also have concerns over the impact of some of the named sites and their impact on heritage assets. They also note that the named villages often have historic character which would need appropriate regard.

3.2.11 In relation to the employment element of the policy a number of respondents, including Wilson Bowden, suggest that more clarity should be given to what 'significant' means. Town centres were also addressed by a number of respondents. There was seen to be a need for retail development to be more explicitly recognised as economic development. It was also identified that existing centres should be developed to support new development rather than providing new centres. There was also objection to the restriction placed on retail, leisure and cultural uses outside of established centres. The following were put forward as places that should be included in the policy:

Broadmarsh and Victoria Centre

Sandiacre

The Tank Farm, Colwick Industrial Estate

Transport was a key issue raised by a number of different respondents. The HBF noted that major new transport infrastructure will be needed, however, the policy is unclear how, when and by whom it will be funded. Key infrastructure needs to be embedded in the Core Strategy, and not left to be dealt with later. GOEM also noted that some matters covered in the RSS, particularly with regard to Strategic Rail Freight facilities and improving access to the airport need to be covered in the Core Strategy.

A number of potential schemes were highlighted by respondents including:

Use redundant rail lines as new public transport links (Gedling Colliery/Great Northern line/Cotgrave)

Road improvements would be required, including to the A453, A606 and A523.

Extensions to the NET to West Bridgford and Kimberley

3.2.12 Support was expressed for the reference to new transport infrastructure, but note that provision should be made for trains to stop at intermediary stations between Nottingham, Newark and Lincoln rather than focusing on enhancing speed times between these locations.

3.2.13 The Coal Board recommend the strategy takes account of surface and deep coal resources through avoiding sterilisation of resources and allowing for pre-extraction. The Aligned Core Strategies should also take account of the mining legacy present in many parts of the area.

3.2.14 CPRE welcomes the decision not to further develop Top Wighay Farm beyond the area already allocated in the Gedling Local Plan, but give reasons to remove the allocation all together.

3.2.15 There was a good level of agreement over the named key settlements in policy 2, albeit with provisos around the impact on Green Belt, especially in Erewash. In Rushcliffe, Crown Estates consider that Bingham should be identified as a rural growth hub and the main focus for rural growth. Other settlements in Rushcliffe not named in the Core Strategies, but which respondents felt appropriate for smaller scale growth include Aslockton, Gotham, East Bridgford, Orston and Tollerton

| Comments on Sites Named in the Policy | | | |
|---|---|--|---|
| Site | Support | Objections | Other Comments |
| Severn Trent Boots Site (Broxtowe) | STW provide evidence from a Flood study to suggest that development is deliverable in this location and point out that further studies are underway. The site got 11 supporting comments. | The site got some objections. | English Heritage comments recorded for Nottingham City apply to the Broxtowe part of Boots/ Severn Trent as well. |
| Between Toton and Stapleford including Toton Sidings (Broxtowe) | Trowell Parish Plan Steering Group cite the site as the only one in Broxtowe with the potential for sustainable transport links. Lafarge Aggregates point out the proximity of their business and the potential for recycling used railway ballast into materials suitable for construction products. The Land and Development Practice believe that Toton Sidings is preferable primarily because it is entirely brownfield and will be accessible because of the commitment to NET. | Beeston and District Civic Society feel the substation and pylons running through the land will restrict development and the house types which can be accommodated. Stapleford Town Council consider development will join Toton, Trowell and Stapleford with a lack of infrastructure planned for Stapleford. This site got the most objections from the general public with the main concern being the loss of open space. | |

| Comments on Sites Named in the Policy | | | |
|---------------------------------------|--|--|--|
| | <p>The site has potential for tram connection and because it is flood zone 2 & 3 potential for green leisure areas and enhancing biodiversity.</p> <p>This site got most support from the general public the main reason cited was the commitment of NET2.</p> | | |
| North of Stapleford (Broxtowe) | <p>Westermans consider that development will not erode the Green Belt and they believe that this SUE meets all 3 of the 'general principles'.</p> <p>Beeston and District Civic Society state this as the preferable site.</p> | <p>Trowell Parish Council consider this should be left as a nature reserve.</p> <p>They also suggest that 3 of the proposed SUEs fall within Trowell which is disproportionate and they want to prevent coalescence. They also suggest that the recent flood alleviation scheme cannot cope with any more development.</p> <p>Stapleford Town Council consider growth without jobs and infrastructure would be unsustainable and there is a lack of provision.</p> <p>Trowell Women's Institute are concerned about flooding issues.</p> <p>The Land and Development Practice do not support the site because it will not contribute to the Previously Developed Land targets.</p> <p>Trowell Parish Plan Steering group have concerns that development will double the size of Trowell.</p> | |
| West of Woodhouse Way (Broxtowe) | <p>GVA Grimley state that this site is deliverable and development is in accordance with the principles of SUEs and development in the Nottingham PUA is more sustainable than in rural areas.</p> <p>The Woodhouse Trust emphasise the good accessibility and infrastructure of the site.</p> | <p>Gaintame Ltd state that their site at Nottingham Road Nuthall is preferable to this site because it is immediately deliverable.</p> | |
| West of Bilborough Road (Broxtowe) | <p>The Crown Estate point out that the site accords strongly with the general principles for the choice of housing sites in</p> | <p>Trowell Parish Council suggest that 3 of the proposed SUEs fall within Trowell which is unfairly disproportionate and they want to</p> | |

| Comments on Sites Named in the Policy | | | |
|---------------------------------------|---|--|---|
| | <p>Broxtowe. It is accessible, not sensitive in landscape terms, has minimal environmental constraints and performs well on Green Belt criteria.</p> <p>Savills state that development will not cause coalescence, is close to facilities and has good transport links and Green Infrastructure.</p> | <p>protect coalescence. They also suggest that the recent flood alleviation scheme cannot cope with any more development.</p> <p>Trowell Parish Plan Steering group have concerns that development will double the size of Trowell</p> | |
| West of Coventry Lane (Broxtowe) | Some very limited support. | <p>Trowell Parish Council suggest that 3 of the proposed SUEs fall within Trowell which is unfairly disproportionate and they want to protect coalescence. They also suggest that the recent flood alleviation scheme cannot cope with any more development.</p> <p>Trowell Parish Plan Steering group have concerns that development will double the size of Trowell.</p> | |
| Stanton Ironworks (Erewash) | <p>Sandiacre Parish Council supports Policy 2 especially the inclusion of a Sustainable Urban Extension at Stanton.</p> <p>Derbyshire County Council supports the approach of providing for 4,420 dwellings in or adjoining Ilkeston Sub-Regional Centre, including the sustainable urban extension at Stanton.</p> <p>Alliance Planning express support for the specific identification of Stanton as a Sustainable Urban Extension stating that the identification of strategic sites critical to a plans delivery is wholly consistent with guidance and advice within PPS12 (paras 4.6 and 4.7)</p> | <p>Alliance Planning state that the minimum number of homes to be provided as part of the Stanton SUE should be revised to 3,000 homes. They also query the use of the word 'significant' (in the absence of any definition) in relation to the amount of new employment to be provided.</p> <p>Many planning consultants/developers (e.g. Smith Stuart Reynolds, Andrew Martin Associates, Westermans Ltd) believe it is questionable that the Stanton SUE can realistically facilitate the number of homes proposed. As such, they believe other sites needs to be examined and looked favourably on e.g. other brownfield sites and sites adjoining sustainable settlements such as Borrowash. Indeed they believe that there are questions about whether the 'unresolved' remediation and infrastructure works required (contamination and highway improvements) can be economically overcome. As such, it is considered the development is unlikely to come forward in the near future.</p> | <p>The Coal Authority reported that it was likely that development at the Stanton SUE would extend over the surface coal resource. As such, it will be necessary to take into account any possible sterilisation impacts and assess the potential for the prior extraction of coal.</p> |

| Comments on Sites Named in the Policy | | | |
|---|---|---|--|
| | | Derbyshire PCT have produced a long list of requirements for development in Erewash notably at Stanton to improve the design and quality of development | |
| Waterside Regeneration Zone (Nottingham) | <p>A resident supports persuading businesses in the Waterside to relocate to modern facilities, the area could be redeveloped as a mixed use development.</p> <p>Oakhill Group Ltd supports the provision of 3000 houses, as well as new employment development on the Eastcroft site.</p> <p>British Waterways - supports proposal for up to 3000 houses and new retail development, in the PUA, as a key element in the delivery of the spatial vision.</p> | | <p>Deancoast highlight that the lack of progress on the redevelopment of the Waterside area, even at a time when the housing market was buoyant, indicates the difficulties with delivery of urban regeneration sites.</p> <p>Environment Agency states that the site is at high risk of flooding. Strategic sites must be tested against the Sequential Test, in the LDF process. The LPA must carefully consider whether this should be carried out to inform the CS or the LAPP DPD. Welcome requirement of strategic Green Infrastructure provision as mitigation.</p> <p>Whitehead (Con) Ltd believe 3000 houses is an optimistic figure.</p> |
| Gedling Colliery/Chase Farm (Gedling Borough) | | | Policy should also recognise employment opportunities at Gedling Colliery. |
| North of Papplewick (Gedling) | <p>Good connectivity with Hucknall (for jobs, services and infrastructure). Site would be within 1km of proposed tram extension. Opportunities to enhance Green Infrastructure. (1 respondent)</p> <p>Support for growth around Hucknall.</p> | <p>On grounds of increase in traffic, impact on local services and infrastructure (especially schools and doctors), impact on the environment/ biodiversity (especially at Moor Pond Wood and the River Leen), destruction of openness to many on the adjoining estate, leading to a town (Hucknall) joining up with a village (Linby)</p> <p>Site is in Hucknall not Gedling, so expense of infrastructure falls to Hucknall. Loss of community spirit, identify and cause disharmony.</p> <p>Uncertainty of housing market.</p> <p>Impact on Linby and Papplewick villages also and coalescence of the 2 villages. Site is on flood plain of River Leen and liable to flooding.</p> | <p>Concern expressed that capacity of site has increased from Local Plan.</p> <p>Should look at mid-term planning rather than long term in current financial climate.</p> <p>Current houses being built at Papplewick Lane are not affordable.</p> <p>Area around Papplewick Woods needs to remain as green fields.</p> <p>Plan unrealistic as recent developments unsold or empty.</p> <p>Better sites than Papplewick Lane</p> |

| Comments on Sites Named in the Policy | | | |
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| | | (27 respondents) | <p>are available at Newstead and Gedling Collieries, Mapperley Golf Course, New Farm Stockings Farm, other brownfield sites.</p> <p>Developer contributions need to be pooled for sites around Hucknall.</p> <p>May be opportunities for positive enhancement of site fringes.</p> |
| Top Wighay Farm (Gedling) | <p>Should allocate more houses at TWF on the grounds the site is a suitable SUE site with an adopted development brief. More suitable than land east of Gamston. (3 responses)</p> <p>Support for growth around Hucknall.</p> | <p>Site is in Hucknall not Gedling, so impacts are on Hucknall.</p> <p>Site is on flood plain of River Leen and liable to flooding. No extension to Line One of NET now, which means site is no longer sustainable. (6 responses)</p> | <p>Remainder of TWF site (white land) should be returned to Green Belt.</p> <p>If site does come forward, then developer contributions should only be spent in Linby, Papplewick or Hucknall (and not the remainder of Gedling borough).</p> <p>Support for decision not to allocate safeguarded land at TWF – should now be returned to Green Belt.</p> |
| Remainder of Boots Site (Nottingham City) | <p>A resident states that we should be utilising all Brownfield sites, such as Boots, before considering the development of any Green Belt land.</p> <p>STW states that development is deliverable.</p> | | <p>English Heritage say redevelopment would need to be very sensitive to the setting of the Grade I listed buildings on site. This issue needs to be acknowledged in the Core Strategy. Associated transport infrastructure could harm the historic environment beyond the site.</p> <p>The Environment Agency states that the site at high risk of flooding. Strategic sites must be tested against the Sequential Test, in the LDF process. The LPA must carefully consider whether this should be carried out to inform the CS or the LAPP DPD. Welcome requirement of strategic Green Infrastructure provision as mitigation.</p> |
| Stanton Tip (Nottingham City) | Strawsons Holdings Ltd say the Core Strategies should read 'at least' 500 dwellings. | | |

| Comments on Sites Named in the Policy | | | |
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| <p>East of Gamston (Rushcliffe)</p> | <p>There was very limited support for the development beyond the site promoters.</p> | <p>There were very many objections to the proposed scheme:-</p> <p>Gamston has already has lots of new housing</p> <p>destruction of farm land within the Green Belt. Impact on two SINCS</p> <p>Susceptible to flooding, from the Trent in the north and from its tributaries.</p> <p>Allotments would be lost</p> <p>Housing targets cannot be met without going across the A52.</p> <p>Absence of an identifiable, defensible Green Belt boundary</p> <p>Loss or rerouting public footpaths/bridleways</p> <p>Bassingfield would be subsumed by development.</p> <p>Coalescence with Tollerton.</p> <p>TollertonAirport should remain.</p> <p>Highly visible</p> <p>Too close to the Water Sports Centre and West Bridgford</p> <p>Impact on Listed buildings in villages</p> <p>Absence of assessment of accessibility, landscape, and environment capacity and infrastructure capacity.</p> <p>Reliance on their private vehicles</p> <p>significant additional commuting</p> <p>cost of road improvements to A52</p> <p>resurrection of plan for a 4thTrent crossing</p> <p>the Tribal report considers the site unsuitable for development.</p> <p>The Grantham canal should be protected rather than further compromised.</p> | <p>Many comments over the characteristics of any new development to make it sustainable and a place which is attractive for residents.</p> <p>If the high land to the east of the airfield and Jubilee Wood, any land liable to flood and the oil pipeline is avoided, development would only be feasible if the airfield closed.</p> <p>A smaller number of houses should be allowed with a mix of dwellings similar to Gamston and Edwalton, largely privately owned with some affordable housing.</p> <p>The future of the airport will have impact on the location of development. CAA safety requirements will dictate what land could be developed.</p> <p>Whilst some respondents consider that the scheme should incorporate the airport, others consider the airport's removal would improve quality of life of residents – blighted by noise of flights currently</p> <p>Tollerton mobile home park should be protected</p> |

| Comments on Sites Named in the Policy | | | |
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| South of Clifton (Rushcliffe) | <p>Opportunity to create a sustainable scheme benefiting the existing Clifton estate through regeneration by association, especially through job opportunities.</p> <p>Potential to deliver high quality employment that would assist Greater Nottingham in terms of economic investment and job creation.</p> <p>Location is ideal for commuting to Derby and Nottingham, the motorway and tram are also close to the site. It would link naturally to Clifton and have good links to the City. The approach to Nottingham from the south will be significantly enhanced, raising the image and profile of the conurbation to widespread future economic and environmental advantage. The Green Infrastructure proposed will enable greater access to the countryside.</p> <p>Development should take place to the east of the A453 and west of the railway line – the residents would then have pedestrian access to Ruddington Country Park and good access to Nottingham (particularly if the A453 is improved)</p> | <p>There were very many objections to the proposed scheme.</p> <p>Concerns were raised including:-</p> <p>loss of Green Belt loss of Grade 2 agricultural urban sprawl. impact on the landscape affect the setting of Glebe Farm. harm to wildlife including hare and mink. Impact of light pollution flood risk the electricity pylons. Clifton is already too big impact on local villages (loss of character, increase in traffic) supermarket threatens village shops industrial estate or retail park would take away existing local businesses. negative impact on house prices development could only go ahead if an infrastructure plan is in place. even with improvements to A453, unable to cope with the traffic. loss of or re-routing of public footpaths</p> | <p>4200 does not reflect capacity which could comprise 5500 dwellings.</p> <p>Many comments over the characteristics of any new development to make it sustainable and a place which is attractive for residents.</p> <p>One respondent suggests that there should be an A453 by pass to the south of Clifton linking to the A52 - housing could then be built between the bypass and the Clifton estate which would remove through traffic from Clifton and preserve a section of the Green Belt.</p> <p>Clifton is thought of as a separate community, in order to make new development sustainable there would need to be an attempt to create a larger Clifton which sees itself as a single place. It was also noted that there is a local authority boundary between the existing and proposed developments, proper integration should take place. However, another respondent considers the development should remain separate to Clifton and have its own identity.</p> |

| Comments on Key Settlements Named in the Policy | | | |
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| Settlement | Support | Object | Other |
| Awsorth | Whitehead Ltd and Fould Construction put forward their site at Gin Close Way | Awsorth Parish Council believe Awsorth does not have the facilities/capacity to sustain further growth. | |
| Brinsley | Some support recorded. | <p>North Broxtowe Preservation Society wish to preserve the Headstocks Heritage site.</p> <p>SABHRE suggest that Brinsley does not have the infrastructure for new housing.</p> | |

| Comments on Key Settlements Named in the Policy | | | |
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| Eastwood | Engine Lane, Lower Beauvale has been put forward by McDyre as a sustainable location on brownfield land. | Some objections reported. | |
| Kimberley | Herbert & R Clay Trust promote their site at Church Hill, Kimberley as a potential site. The land owners at Alma Hill feel their site is in accordance with the site selection criteria. | Some objections reported. | |
| Watnall | Trowell Parish Council query why Watnall has not been put forward for development. Ken Mafham Associates put forward Watnall Brickworks. | Greasley Parish Council comment that Watnall was regarded as not suitable for development after an inquiry and feel there have been no changes since then. | |
| Breaston | Derbyshire County Council supports the approach of providing growth in these 'larger settlements' | CPRE (Derbyshire Branch) state that is important to recognise that Breaston, Draycott, Borrowwash and West Hallam all have their individual characteristics and centres and should not be joined. There is already little open space separating them and a danger of developing a huge conurbation from the East of Nottingham to the West of Derby. The importance of the Green Belt in avoiding the coalescence of existing settlements needs reinforcing. Also want to avoid the need to use greenfield land for development by only seeing greenfield development allowed if needed in the later stages of the plan. Concerned about the statement "...homes...in or adjoining ...Breaston, Borrowwash, Draycott ..., in Erewash". Any development is likely to erode the Green Belt, the continuation of which is essential to prevent the coalescence; the residents of these villages frequently state that there has already been too much development in these locations. | |
| Borrowwash | See Derbyshire County Council comments for Breaston. The identification of Borrowwash as one of the growth locations outside of the PUA is fully endorsed. Borrowwash is a | See CPRE comments attributed to Breaston (above). | |

| Comments on Key Settlements Named in the Policy | | | |
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| | sustainable settlement and its proportionate growth accords fully with the Regional Spatial Strategy. Collyers Nursery and Garden centre on the eastern edge of the settlement, is both available and deliverable and the Green Belt could be amended to the more appropriate defensible boundary of the eastern hedgerow, which separates the built framework of Borrowwash from the open countryside. | | |
| Draycott | The Derby and Sandiacre Canal Trust wishes to see the Canal fully reinstated throughout its length and has considered the possibility of a large housing allocation bordering Draycott (mainly) and Breaston being the catalyst for recreational and housing developments which might contribute in a positive way to housing needs and recreational opportunities in the area. | See CPRE comments attributed to Breaston (above) | |
| West Hallam | See Derbyshire County Council comments for Breaston. | See CPRE comments attributed to Breaston (above). West Hallam Parish Council believes there is very little opportunity for any development in West Hallam and the existing Green Belt and Open Space provision should be protected. | |
| Bestwood Village | 4 responses support the identification of this village. Would enable the renewal of the social infrastructure of the village. Potential for regeneration-led development. | 1 response objects to the identification of this village. | Should be named as a Sub Regional Centre in parag 2.3.6 to reflect fact that village is part of HMA and PUA. Need to avoid coalescence with Bulwell and Hucknall. |
| Calverton | 3 responses support the identification of this village. Support for conclusions of Sustainable Locations for Growth study. | The potential scale of development is out of proportion to the existing envelope and to what is proposed for other villages. Limited employment opportunities in village. High proportion of commuters to Nottingham. 1 response objects to the identification of this village. | Specific sites proposed for development to west of Flatts Lane, to south of Crookdole Lane, and at Hollinwood Lane. Document contains factual inaccuracies in assessment of viability of Calverton to sustain new growth (Calverton Parish Council). |

| Comments on Key Settlements Named in the Policy | | | |
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| <p>Ravenshead</p> | <p>Would provide more ecofriendly low-cost housing for younger people to afford which is desperately needed. Capacity in schools. Could develop land on Ravenshead side of Kighill without extending into surrounding countryside. Proximity to A60.</p> <p>5 responses support the identification of this village.</p> <p>Potential development of land between Cornwater and Kighill Lane.</p> | <p>On grounds of lack of shopping facilities, parking problems, loss of green field land, loss of character, lack of employment facilities, loss of Green Belt, increase in traffic on A60, loss of green space (vital for leisure and tourism and general health), pressure on existing amenities, has had sufficient development over past few years, proposed number of dwellings is too high (too high density) so little or no parking facilities, drainage problems, lack of need, associated increase in use of the car.</p> <p>13 responses object to the identification of this village.</p> | <p>Would like to see smaller properties made available to the elderly and starter homes for the young.</p> <p>Queried the 80/20 split for owned/rented affordable homes.</p> <p>Proportion of affordable housing unacceptable as contrary to special character of the village.</p> <p>Need provision for older people as identified in Ravenshead Housing Needs Study.</p> <p>Impact on development on nearby SSSI – consider instead land to south of Kighill Lane/east of A60.</p> <p>Consider building a new primary school</p> <p>Calverton more sustainable than Ravenshead due to larger shopping area.</p> <p>New building should be visually appealing and complimentary to the village.</p> |
| <p>Bingham</p> | <p>One respondent considered that Bingham should be identified as a rural growth hub and the main focus for rural growth within Rushcliffe.</p> <p>Houses should be focused on Bingham so strong transport links can be established.</p> <p>It is noted that Bingham is already on the rail network providing transport links. The respondent felt that the A52 should be expanded to provide serviceable road link into city centre</p> <p>One respondent noted that land on the outskirts of Bingham is suitable for new housing as there are less traffic problems there.</p> | <p>One respondent commented that they were happy Rushcliffe Borough Council are challenging the figures set as 3,500 houses seems too high to attach to Bingham - this would alter the town and ruin its character, the railway currently acts as a barrier to the town, this site will never become a part of the Bingham area.</p> <p>It was noted that part of the Parson's Hill area is floodplain, it is also productive farming land and should remain as such.</p> | <p>A comment was made that the former Local Plan allocated a large site between the A46 and Chapel Lane Bingham for a BusinessPark, the dualling of the A46 and proximity of A52 must make this an attractive employment location?</p> <p>Bingham needs infrastructure - schools (more, not bigger), police, car parking (not pay/display), one way system.</p> |

| Comments on Key Settlements Named in the Policy | | | |
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| | <p>Land for development at 'North Bingham' should not be dismissed as an alternative option that has been rejected.</p> <p>Bingham Town Council note that they support the omission of large development sites near Bingham, this they consider would be inappropriate.</p> | | |
| Cotgrave | <p>Some support was given for new houses, it was noted that the town is well served by range of services including primary school, health centre, leisure centre and local shops, employment opportunities and good public transport links.</p> <p>Cotgrave needs development led regeneration to enhance its physical environment and its social and economic performance. Colliery site should be developed for mixed use, including some employment, the value which it has developed for biodiversity and recreation should be recognised through the inclusion of open space.</p> | <p>One respondent noted that whilst none of the sites are particularly desirable for large scale development, none would have the devastating impact that would occur at Cotgrave, which is already over developed.</p> | |
| East Leake | <p>The village is a sustainable location with good public transport.</p> <p>It was noted that new residential growth would assist in maintaining the vitality and viability of rural settlements by supporting the existing shops and local facilities.</p> <p>Development in particular of the site promoted by Mr. Brooksbank could be accommodated without the settlement boundaries needing to be extended further into the open countryside.</p> | <p>East Leake has had too many houses over the last 10 years, with no infrastructure put in place to serve these properties. It was noted by one respondent that the Health Centre cannot cope with existing patient numbers, schools are struggling with numbers, there is no bank and more shops have been lost.</p> | |
| Keyworth | <p>Keyworth has a defined centre, with a range of services, it has local employment opportunities, good public transport links, and is well positioned within the Tollerton transport corridor. No constraints identified that would prevent development of the land in principle.</p> <p>Limited Green Belt expansion of the village is a realistic option for growth, significant distance between Keyworth and neighbouring villages would prevent coalescence.</p> | <p>Keyworth is already over developed and does not have growth potential beyond meeting local needs. There are concerns that development would result in an increase in traffic add to existing problems and demands on infrastructure and services.</p> <p>One consultee notes that allocation of sites could drastically impact on settlement's character as this would compromise the Green Belt.</p> | <p>The elderly population is well catered for in Keyworth. Wrights garage should become housing for the elderly.</p> <p>There is not a need for additional bungalows for older people.</p> <p>A respondent felt that self build properties should be encouraged.</p> |

| Comments on Key Settlements Named in the Policy | | | |
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| | <p>Various site specific suggestions:</p> <p>Land at Bunny Lane would create linkages to Debdale Lane and</p> <p>Wysall Lane and relate better to the existing settlement boundary than would development to the east of the village.</p> <p>Expansion to the west preferable, it is closer to the village centre. Facilities within walking distance.</p> <p>Land at the south-east of Keyworth, off Willow Brook is available and deliverable, being in single ownership.</p> <p>Some development in Keyworth would make efficient use of existing services, and support new ones, it is noted that this is supported by the Village Plan.</p> | <p>It was noted that only land available for development is playing fields and allotments, neither are up for negotiation therefore Green Belt land will have to be lost.</p> | <p>Any development in Keyworth should retain the 'village' atmosphere and should have a sustainable means of getting to one of Keyworth's two centres.</p> <p>It was felt that Keyworth will need some development at some point – more mid range houses are needed, the village plan which suggests that people feel there should be more affordable housing for local young people in an area where house prices are high.</p> |
| Radcliffe on Trent | <p>Radcliffe on Trent should be considered a priority for development. Land to the east of Radcliffe on Trent is available and deliverable and does not require major infrastructure. It relates well to the existing urban area, and is accessible to the village centre. The village has good public transport and cycle links to the city centre.</p> <p>Settlement has a local centre, with a range of jobs and services, and school provision. A limited number – say 200 new dwellings if developed over the next 15 years would be acceptable.</p> <p>One respondent set out the advantages of land to the west of Radcliffe on Trent and north of Nottingham Road :</p> <p>Land at Grantham Road Radcliffe is identified as a location for an extension to the village.</p> | <p>Local facilities would not be able to cope, with the increased development destroying the soft approach to the village; it is felt that proposed access points will create traffic problems.</p> <p>One respondent identified that they would oppose development of the land north of Nottingham Road. The site is within the Green Belt and would change the character of the village, the land is within the flood plain area - the area and surrounding floods regularly. The greater part of the development sits under electricity pylons - this is not a healthy environment to live in.</p> <p>The local road network would be unable to cope. A respondent queries whether the developers budgeted to build another sewage works for Severn Trent.</p> | <p>One comment noted that there is a need for a more comprehensive building for medical services with a full size chemist attached, services such as dentistry, alternative therapies etc should be given opportunities to develop.</p> <p>Affordable housing and bungalows are a priority.</p> <p>A comment was made noting that a radical rethink of car parking facilities would be needed if population is to increase.</p> |

| Comments on Key Settlements Named in the Policy | | | |
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| Ruddington | One respondent notes that Ruddington has a defined centre, containing a range of jobs and services, and school provision, good public transport links to the city centre. Land at the northern end of Ruddington to the west of Wilford Road is available and deliverable, being in single ownership. While the land is Green Belt, policy 2.5 endorses the need to review Green Belt boundaries to accommodate development of smaller settlements, inline with the requirements of the Regional Plan. The Green Belt could be amended to a highly defensible boundary. No constraints have been identified that would prevent development of the land in principle. | A respondent states that they would not support further large developments near Ruddington as the High Street is already a bottle neck. | |

3.2.16 Respondents suggested the following alternative locations for major development:

Whyburn Farm, north of Hucknall, Ashfield

Low Wood Road and north of the B600 Nottingham Road at Nuthall, Broxtowe

Site at Nottingham Road , Nuthall, Broxtowe

New Farm Lane , Nuthall, Broxtowe

Land at Engine Lane, Lower Beauvale, Eastwood, Broxtowe

Church Hill, Kimberley, Broxtowe

Watnall Brickworks, Broxtowe

Alma Hill, Kimberley, Broxtowe

Gin Close Way Awworth, Broxtowe

Oakwell Brickworks, south of the A609, Erewash

Land at Woodlands Farm, Erewash

Willow Farm, Erewash

Land at Stanley Lodge Farm, Stanley Common, Erewash

Land bordering Draycott and Breaston could be catalyst to restore the Derby and Sandiacre Canal, Erewash

Engine Lane, Lower Beauvale, Eastwood, Erewash

Bunkerhill site

Arnold, (supported by a further tram line) Gedling

BrookfieldsGarden Centre, Gedling

New Farm, Red Hill, (and also land off Lodge Farm Lane on the opposite side of Mansfield Road), Gedling

Land at Willow Farm, adjoining the PUA, Gedling

Westhouse Farm, BestwoodVillage, Gedling

Land off Hollinwood Lane , Calverton, Gedling

A60/Longdale Lane/Kighill Lane , Ravenshead, Gedling

Mapperley Golf Course/Newstead Colliery (Gedling) instead of Papplewick Lane , Gedling

An enlarged allocation at Top Wighay Farm, Gedling

Burton Joyce should be named as a settlement for growth in Gedling.

Quarry area of Holme Pierrepont, Rushcliffe

Newton Airfield, Rushcliffe

Holme Pierrepont, Rushcliffe

Land to the north of Ruddington, Rushcliffe

Edwalton Golf Course, Rushcliffe

A new town on land to the east of Rushcliffe

Cotgrave Golf Course, Rushcliffe

Grantham Road, Radcliffe, Rushcliffe

West of Wilford Road, Ruddington, Rushcliffe

British Geological Survey, Keyworth, Rushcliffe

Manor Farm, East Bridgford, Rushcliffe

Bunny Lane, Keyworth, Rushcliffe

Yew Tree Farm, Orston, Rushcliffe

Cliff Hill Lane, Aslockton, Rushcliffe

East of Radcliffe on Trent, Rushcliffe

Nottingham Airfield, Tollerton, Rushcliffe

Bingham, Rushcliffe

NB many of these sites are too small to be included as 'strategic sites' within a Core Strategy.

Officer Response

3.2.17 A number of changes have been made to reflect the Regional Strategy being abolished, resulting in some policy basis needing to be established with the Core Strategy.

3.2.18 The policy now sets out both a spatial strategy for growth and the settlement hierarchy to accommodate that growth. A separate Green Belt policy is now also included.

3.2.19 The total housing provision figures have been revisited, and have been subject to separate consultation in the Housing Provision Position Paper, for which a separate Report of Consultation has been prepared. The new policy reflects the fact that Rushcliffe Borough have decided to take a different approach to housing provision and prepare their own Core Strategy, whilst Broxtowe Erewash, Gedling and Nottingham City continue to consider the figures from the Option for Consultation, derived from the Regional Strategy, remain the most appropriate figures, albeit adjusted to allow a 15 year plan period, from adoption (ie 2011 to 2028).

3.2.20 Due to deliverability issues in the current economic climate, Gedling Colliery/Chase Farm in Gedling and Stanton in Erewash are unlikely to be developed as early in the plan period as initially hoped. In these cases the relevant councils are proposing alternative locations (at Key Settlements in Gedling, and Ilkeston West and Land West of Quarry Hill Road in Erewash) to allow for the delivery of the housing figures proposed through the Aligned Core Strategies. Stanton remains a Strategic Site, but is not expected to deliver housing until later in the plan period, and has a reduced housing provision figure as a result. Gedling Colliery/Chase Farm is now identified for future housing development in the longer term potentially beyond the plan period, and therefore it has no specific housing provision figure associated with it. Nevertheless, every effort will be made to address deliverability issues with the aim of bringing forward development earlier in the plan period.

3.2.21 From the range of sites proposed by Broxtowe Borough as potential Sustainable Urban Extensions, Field Farm has been selected as the most appropriate location.

3.2.22 Where points are made to the Employment, Town Centre, Transport or Green Infrastructure policies, these are reflected in the summary sections of Policy 2.

| Number of Comments | Number of Respondents |
|--------------------|-----------------------|
| 1,537 | 1,258 |

List of Respondents

A A H Cunningham, A C Toy, A Carter, A Chilton, A D Austin, A Dabell, A Freestone, A M Geary, A W Howick, AB & RFA Parker, AE Fox, AI Weatherall, Alison & Mark Pilnick & Beaven, Alliance Planning, Andrew Cope, Andrew Martin Associates, Angela Plowright, Anita Turnbull, Ann & Alastair Wilkes & Langton, Ashfield District Council, Awsworth Parish Council, B Hunn, B L Taylor, B Moverley, B Wray, B.G Spilsbury, Barbara Judd, Barbara Ross, Barbara Walker, Barratt Strategic/Westerman Homes Ltd, Barry Carr, Barton in Fabis Parish Council, Bartons Public Limited Company, BD Wisher, BE Wilcox, Bev Wynne, Bingham Town Council, Brenda Barker, British Horse Society, British Waterways, Brookfields Garden Centre, Bryson, Burton Joyce Residents Association, Butler, C Deakin, C Farrow, C Tailby, Campaign for Better Transport, Capital Shopping Centres, Caroline Coles, Caroline Staves, Caroline Trickett, CEMEX, Chris Hendy, Chris Swallow, Christine Smith, City Estates, Claire Worthington, Cliff Way, Clifton Wilford & Silverdale Forum, Cllr J. M. Fraser Royce, Cllr John Stockwood, Cllr Robert Parkinson, Commercial Estates Group (CEG), Confederation Of Passenger Transport UK, Conrad Oatey, Corylus, Councillor Linby Parish Council, Councillor Philip Waldram Smith, CPRE (Gedling), CPRE Derbyshire Branch, CPRE, Crown Estate, D A Page, D A Rosselli, D C Phillips, D File, D Smith, D Wilkinson, Daisy Bailey, Dale Abbey Parish Council, Dani and Ben , David and Rosemary Register, David N Ogden, David Shepherd, David Valencia, David Whitehall, David Wilson Estates, DB Power, Deancoast, Derby and Sandiacre Canal Trust, Derby City Council, Derbyshire County Council, Derbyshire County Primary Care Trust (PCT), Derbyshire Gypsy Liaison Group, Derbyshire Wildlife Trust, Derwent Living, DI Newton, Different Owners (4), Dorothy Matthews, Dr & Mrs J R Brown, Dr A Raouf, Dr C C Beardah, Dr Helen McVicar, Dr Jan Smrz, Dr Jennifer West-Jones, Dr Joan Hiller, Dr KA O'Hara-Dhand, Dr Kevin Pyke, Dr Walid Tizani, Dr, Penn, Dr, Waldron, DTZ Piedad Consulting, E Franks, E Peterson, EA Pattinson, East Midlands Development Agency, EJ Coles, Eleanor Vickers, Elizabeth Brackenbury, Elizabeth Fradd, Elton Parish Council, English Heritage, Environment Agency, Erewash Borough Council, F D Wisher, F M Scotney, Foster, Fran & Rod Tristram & Bailey, G & W Cursham, G B Pike, G Dennis, G Dyke, G Fletcher, G Fraser, G Lockwood, G Madgett, GA and GL Bourne and Brewster, Gaintame Ltd C/O Nattras Giles, Gary Callon, Glennis P Taylor, GN Cutts, Government Office East Midlands, Gotham Parish Council, Graham Harvey-Flewitt, Greasley Parish Council, Green Squeeze, Green Streets West Bridgford, Greenwood Community Forest Partnership, Hallam Land Management Limited, Harriet Kaczmarczuk, Hazel Dill, Heaton Planning (on Behalf Of LAL), Helen Ogden, Herbert Button & Partners, Hickling, Hilda G Clarke, Holme Pierrepont and Gamston Parish Council, Holmes Antill, House Builders Federation (HBF), Hucknall North Safer Neighbourhood Committee, Hunter Page Planning, Indigo Planning, isabella dobson, J Akroyd, J Barnes, J Chester, J Depian, J Evley, J P W & P A Wall, J Robinson, J Scotney, J Sullivan, J Thomas, J W Dring, J Watson, J.G Kerr, JA & DM Woodall, JA Sanders, Jack Burdett, JC Gale, JE Hogg, Jean Green, Jennifer Harbey, JK Browne, John Perivolovis, John Vanhegan, Joy Mayfield, JP Hopkinson, JS Bloor (Services Ltd), Julie Mortimer, Julie Napper, Junction 26 Investments Ltd C/o GVA Grimley, K L Spencer, K Raynor, K Winfield, Karen Burton, Kate Preston, Kearton, Ken Mafham Associates For Chantry 27, Keyworth Parish Council, Keyworth Village Design Statement, Kim Simpson, Kinoulton Parish Council, L Garton, L Hodson, L M Greenwood, L McCarthy, L Ward, Lady Bay Community Association, Langridge Homes, Lee , Leicestershire County Council, Lilian Neely, Lily , Lisa Sumner, Louise unk, Lynda Cooper, Lynn Stultz, M A Towers, M Bidmead, M Davies, M Edwards, M G Banbury, M Horseman, M J Anderson, M J Whittington, M

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Mr P Baxter, Mr P Chettle, Mr P F Parker, Mr P Veal, Mr paramjit somal, Mr pat norton, Mr Patrick Thomas Guerin, Mr Paul Aikens, Mr Paul Beck, Mr Paul Booth, Mr Paul Cooper, Mr paul cowland, Mr Paul Freeborough, Mr Paul Green, Mr Paul Smith, Mr Paul Ward, Mr Paul Watson, Mr Paul Worley, Mr Paul Wright, Mr PD Walker, Mr Peter Anderson, Mr Peter B Inskeed, Mr peter burnett, Mr Peter Lane, Mr Peter Smith, Mr Peter Wilson, Mr Peter Winstanley, Mr Peter Woodhead, Mr PF McGowan, Mr Phil Daniels, Mr phil roberts, Mr Philip Buckby, Mr Philip Hill, Mr philip hopewell, Mr Philip Matthews, Mr Philip Norris, Mr Phillip A Taylor, Mr PW Butler, Mr R Allright, Mr R Brougham, Mr R J Brooks, Mr R Priestley, Mr RA May, Mr Ralph Todd, Mr RH Pickerill, Mr Richard Anthony Spouge, Mr Richard Burrows, Mr Richard Dearden, Mr Richard Harris, Mr Richard McDonough, Mr Richard Woodhurst, Mr Richard Woodings, Mr RJ Wakefield, Mr Rob Kerr, Mr Robert Crosby, Mr Robert Dixon, Mr Robert Hardisty, Mr Robert Hogg, Mr Robert Lilley, Mr Robert Stanley, Mr Robert Webb, Mr Roger Baird, Mr Roger Hawkins, Mr Roger Holland, Mr Roger McMurray, Mr Ross Martin, Mr Roy Haines-Young, Mr Roy Smith, Mr Russ Hamer, Mr RW Green, Mr S Barnes, Mr S Broderick, Mr S Matthews, Mr S Wood, Mr Scott Bowes, Mr Shaun Hayfield, Mr Simon Davies, Mr Simon Hudson, Mr Simon Robinson, Mr SR Guy, Mr Stephen Barnes, Mr Stephen Hogg, Mr Stephen Humphreys, Mr Stephen P Hogg, Mr Stephen Rice, Mr Steven Holley, Mr Steven Johnson, Mr Steven Roberts, Mr Stewart Burrows, Mr Stewart, Davidson, Mr Stuart Holden, Mr T Garfield, Mr T Glover, Mr T Hall, Mr T R Kirkham, Mr Thomas Hall, Mr Thomas Parker, Mr Tim Dobson, Mr Tim Ireland, Mr Tim Potts, Mr Tim Shephard, Mr Toby Greany, Mr Tom Kay, Mr Tony Fisher, Mr Tony Teatum, Mr Trevor Marriott, Mr Trevor Pull, Mr Trevor Sparks, Mr Trevor Vennett-Smith, Mr W Mellors, Mr William Bacon, Mr William Gunn, Mr William Hodson, Mr William John Lewin, Mr, Gilbert, Mr, Harrison, Mr, Henson, Mr, Mrs and Miss JW, VM and MA Allen, Mr, Mrs, Miss & Miss D, J, D & J Fisher, Mr, Mrs, Mr & Miss A, E, C & R Allright, Mr, Trinder, Mr. Chris Kemp, Mr. James Lowe, Mr. T.C.Lindsay Simpson, Mrs & Dr Teresa & Geoff Matthews, Mrs A Ellis, Mrs A Hallam, Mrs A Harding, Mrs A Hartshorne, Mrs A J Baxter, Mrs A Toombs, Mrs A Wilcox, Mrs Adela Clarke, Mrs and Miss, Shaw and Strickland, Mrs Ann Brereton, Mrs Ann Thompson, Mrs Ann Tinklin, Mrs B Chester, Mrs B Cooke, Mrs B Downing, Mrs B M Hallam, Mrs B Newell, Mrs B Stevenson, Mrs B Tomlinson, Mrs B Venes, Mrs Barbara Sketchley, Mrs Beverley Severn, Mrs BI Bellamy, Mrs Brenda Collishaw, Mrs C Edis, Mrs C Greenhalgh, Mrs C North, Mrs C Vickers, Mrs Carina Neil, Mrs Carole Jervis, Mrs Cecily Atkins, Mrs Cheryl Thorley, Mrs Christina Morgan, Mrs Cynthia Woodhead, Mrs D Bassford, Mrs D Garfield, Mrs D Kent, Mrs D Mellor, Mrs Deborah Leatherbarrow, Mrs Denise Ireland, Mrs Diane Wright, Mrs E Jones, Mrs E Pirt, Mrs E Wood, Mrs EA Soar, Mrs Ellen Newton, Mrs F Hallam, Mrs G Robinson, Mrs Gillian Chesney-Green, Mrs Glenys Wyles, Mrs GS Hind, Mrs H Hopps, Mrs HA Holland, Mrs Hazel M Trobridge, Mrs Helen Lomas, Mrs Irene Briggs, Mrs J E Turner, Mrs J M Wilkinson, Mrs J Peckover, Mrs J Pratt, Mrs J R Cooper, Mrs J Smith, Mrs J Towers, Mrs J Williams, Mrs Jane Wallace, Mrs Jeanette Stinchcombe, Mrs Jennifer Marshall, Mrs JM Healy, Mrs Judith Raven, Mrs Julie Turner, Mrs K A Bexon, Mrs K Taylor, Mrs Karen W, Mrs Kathleen Pietrzak, Mrs L Dransfield, Mrs L J Taylor, Mrs LB School, Mrs Lesley Hughes, Mrs Lorraine Philip, Mrs M Archer, Mrs M Cunningham, Mrs M Heys, Mrs M Jones, Mrs M Mitchell, Mrs M Pipes, Mrs M S Luff, Mrs M Wood, Mrs M Woodhead, Mrs Margaret Ann Holland, Mrs Margaret Cooper, Mrs Margaret Kerr, Mrs Margaret Warsop, Mrs Mary Gell, Mrs Mary Whitehead, Mrs Maureen Hudson, Mrs Mavis Harrison, Mrs MF Harvey, Mrs MI Brereton, Mrs MJ Bird, Mrs MJ Forsyth, Mrs MJ Plumb, Mrs N E Blackmore, Mrs N Fitchett, Mrs Nicola Shaw, Mrs Nina Davies, Mrs O Thomas, Mrs P A Moore, Mrs P Anderson, Mrs P Curtis, Mrs P Dean, Mrs P Hartshorne, Mrs P Head-Rapson, Mrs P Jephson, Mrs P Martin, Mrs P Stace, Mrs PA Basford, Mrs Pahela

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3.3 The Sustainable Urban Extensions

3.3.1 The consultation responses to this policy are generally focused on specific SUE sites in the respective districts and for the main part residents raise the potential problems for their neighbourhood and disagree with building in the Green Belt. Members of the public questioned the need for housing and believe that existing housing should be utilised. Developers on the other hand put their sites forward as deliverable and spell out barriers to other sites. In this respect the policy responses are similar to those of Policy 2.

3.3.2 The overarching aim of the policy to provide high level guidance for the delivery of sustainable housing sites was supported, as was the emphasis placed on climate change, transport and Green Infrastructure provision. The Environment Agency considers that higher levels of sustainability should be delivered by the SUEs if achievable in order to accelerate mitigation and adaption to climate change. The emphasis in the Policy should be establishing self-sustaining communities that support existing facilities not just 'commuter' towns. The Derbyshire branch of the Campaign to Protect Rural England (CPRE) highlight that the Sustainability Appraisal needs to consider the net effect on sustainability of developing the SUEs.

3.3.3 However, a number of criticisms of the spatial strategy behind the identification of specific sites were raised by respondents. The logic of selecting development sites close to the City Centre in order to minimise environmental impact from traffic was seen to be flawed, comes at the expense of more distributed development and fails to take account of local need. Additionally, the connection between Erewash Borough and the Nottingham Core Housing Market Area (HMA) was questioned.

3.3.4 The element of the policy dealing with renewable energy was the subject of a number of comments. The statement that there had been agreement that large scale developments should meet higher targets for CO₂ reduction was questioned by a developer who believed that this agreement was not universal. The same developer highlighted the potential for confusion or conflict between this Policy and Policy 1 (Climate Change) in relation to the requirements for sustainability. There were also calls for renewable energy to be made a requirement of the SUEs. The ability to recover energy from waste was an issue that one respondent felt could be highlighted in the policy.

3.3.5 Green Infrastructure and heritage were also issues which attracted a number of comments. Derbyshire Wildlife Trust felt that the protection of important natural, cultural and historic assets should be the first objective of the development of sites. English Heritage were of the view that heritage should be separated out from Green Infrastructure. The potential confusion that could arise from the different terms used for local sites of biodiversity value should be addressed; Nottinghamshire uses the term Site of Importance for Nature Conservation (SINC) while Derbyshire uses the term Local Site and definitions for both should be included in the glossary. Natural England's ANGSt standards discussed in Policy 15 should be cross referenced to this policy. In addition, British Waterways consider that a Water Cycle Study should be undertaken for each of the identified SUEs.

3.3.6 References were also made to the approach to local services. Respondents raised the need to address 'non-school learning' alongside discussion of education requirements and also the need to make specific references to library facilities. Sports England suggested

that local facilities should clearly emphasise sports facilities. Derbyshire County Primary Care Trust considered that provision of health care should be given the same prominence as education and fully considered as part of the planning process to avoid health inequalities and ensure that healthy lifestyles are reinforced by excellent community design.

3.3.7 Although there was support from Leicestershire County Council amongst others for the policy approach of mixed housing and employment developments to reduce the need to travel, there were concerns raised by a Parish Council regarding the impact on local communities due to the increase in traffic. It was felt that a plan for connecting new development with the local area will be needed and that the list of methods to produce a modal shift away from the private car should not be seen as exhaustive. Transport assessments will be needed and the East Midlands Development Agency (EMDA) suggest that the use of Delivering a Sustainable Transport System (DaSTs) will require the commitment of a wider range of stakeholders than those identified. References to cycling and walking should be given more importance.

3.3.8 The need to ensure delivery of the sites was identified by a number of respondents. The use of masterplans, area action plans, supplementary planning documents or site specific policies could be used to ensure that locally distinct issues were addressed although this would make this policy unnecessary in future versions of the Aligned Core Strategies. One developer identified that the use of these should not hinder the development of needed housing. It will be important that local community groups are fully involved in consultations. It was identified that Council Tax will not be able to provide for all the infrastructure required. The Community Infrastructure Levy should be taken forward along with contributions from Central Government.

3.3.9 GOEM highlighted that strategic sites should be included in the Core Strategies and these should be clearly defined. In addition to the key diagram, the Core Strategies should show how the proposals map is to be updated once adopted. Reference to the Green Belt and specifically PPG2 could also be made in the policy along with the impact on mineral sterilisation.

Officer Response

3.3.10 It is agreed that this policy is not needed as the policy hook on all relevant matters are contained elsewhere in the Aligned Core Strategy (in particular Policy 2 Spatial Strategy), and the detail will be dealt with in subsequent policy documents.

| Number of Comments | Number of Consultees |
|--------------------|----------------------|
| 140 | 108 |

List of Respondents

F D Wisher, Alliance Planning, Barratt Strategic, Westerman Homes Ltd, Barton in Fabis Parish Council, British Waterways, Campaign for Better Transport, Capital Shopping Centres, CEMEX, Confederation Of Passenger, Transport UK, CPRE Derbyshire Branch, Dale Abbey Parish Council, David Wilson Estates, Derbyshire County Council - Forward Planning

Derbyshire County Primary Care Trust (PCT), Derbyshire Gypsy Liaison Group, Derbyshire Wildlife Trust, Dr Sue Ball, East Midlands Development Agency (EMDA), Elton Parish Council, English Heritage, Environment Agency, Erewash Borough Council - Development Management, GOEM, Government Office East Midlands, Holmes Antill, J Barnes, Junction 26 Investments Ltd C/o GVA Grimley, Langridge Homes, Leicestershire County Council - Planning Policy, Miss H Robson, Miss Rachael Thorne, Montagu Evans, Mr & Mrs Bartram, Mr & Mrs D & A Howick, Mr & Mrs D & R Mills Deakin, Mr & Mrs F Taylor, Mr & Mrs Mark & Rachel Hill, Mr & Mrs R V Corney, Mr Allan Kerr, Mr and Mrs Watson, Mr and Mrs B and E Stevens, Mr, Anthony B Green, Mr Anthony Crean, Mr Clyde Hinton, Mr David Alexander, Mr ED Murphy, Mr Edward Stace, Mr G Joseph, Mr Gary Trickett, Mr Ian Hayward, Mr J Winder, Mr Jeremy Fenn, Mr John A Fletcher, Mr Martin Truman, Mr Melvyn Tisbury, Mr Michael J Shepperd, Mr Mick Ackroyd, Mr Nigel Perkins, Mr Paul Green, Mr Robert Hoare, Mr Stephen Walker, Mr Steven Roberts, Mr Tony Fisher, Mrs A Hallam, Mrs Christina Morgan, Mrs Fay Sexton, Mrs John Hooley, Mrs M Archer, Mrs Shirley Dooley, Ms Angela Cooper, Ms christine youldon, Ms Elaine Padden, Ms Emma Parry, Ms Julie Shepperd, Ms Lorraine Koban, Ms Nicola Roberts, Ms Patricia Dines, Ms Rosanne Shepperd, Ms Wendy Kerr, Ms. Peach, Natural England, Nottingham Action Group on HMOs, Nottingham City Council, Nottingham City Homes, Nottinghamshire Police, P.G. Ellison, Planning and Development, Nottinghamshire County Teaching Primary Care Trust, Ramblers Association, Risley Parish Council, Ruddington Parish Council, Rushcliffe CPRE, Sandiacre Parish Council, Savilles FAO Sam Stafford, Spatial Planning, Nottinghamshire County Council, Sport England, Stanton-by-Dale Parish Council, Taylor Wimpey Developments Ltd, The Coal Authority, The Co-operative Group, The Crown Estate Office (FAO Jon Beeson ENTEC), Theresa Holland, Thrumpton Parish Meeting, Tillbridge Developments LLP, Turley Associates, Victoria TRA, W Westerman Ltd C/O DPDS Consulting Wilson Bowden Development Ltd

3.4 Employment Provision and Economic Development

3.4.1 Policy 4 received general support with many respondents encouraged by its intended objective to provide a sufficient amount of good quality job opportunities across Greater Nottingham. Nottingham City Council Estates expressed support for the central element of Policy 4 which enables poor quality sites to be released for other uses whilst allowing for a range of new sites to be provided which are attractive to the market.

3.4.2 EMDA supported paragraph 3.4.10 that highlights the need to strengthen the city's role as an exemplar of international science and technology innovation and go on to emphasise the need for site specific Development Plan Documents (DPDs) to identify such sites. The University of Nottingham and Nottingham Trent University both 'fully' and 'strongly' support the recognition of the Universities' positive economic role and way the Policy will help to deliver the Science City Agenda. EMDA are encouraged by the promotion of training opportunities (at Policy 4(7)) to assist residents in accessing new jobs. Similarly, several Parish Councils, the National Farmers Union and the CPRE, were all 'particularly glad' at the inclusion of (7) to promote the rural economy and encourage rural diversification.

3.4.3 Various concerns were expressed about aspects of Policy 4 which require re-consideration. One respondent stated that the target for office jobs should be regarded as an indicative minimum whilst also criticising the lack of provision for non-office based employment, thereby providing no incentives to potential developers. Similarly, Erewash Borough Council's Development Management section were concerned that the policy is specific to office jobs and not other forms of employment-generating development. Another respondent stated that more focus needed to be made on addressing manufacturing needs.

3.4.4 Nottinghamshire Police expressed concern about the high level of focus on providing employment-generating development in the city centre (Eastside & Southside) and limited amounts in outlying areas. This would increase the number and length of journeys and threaten carbon reduction targets. A Parish Council shared this concern and proposed 'active encouragement of small medium sized business in other areas' alongside the city centre development.

3.4.5 A comment regarding why 'significant' employment development was proposed as part of some SUE sites and not others was raised by a planning consultant. In addition to this, GOEM and Nottinghamshire County Council both raised concerns about the use of words such as 'significant', 'local' and 'lesser scale' when used to explain the provision of new employment development due to the potential for different interpretations.

3.4.6 Sport England requested that Policy 4 needed to recognise the role that sports facilities can play in economic development.

3.4.7 A number of general comments were made regarding the approach taken towards encouraging employment provision as part of developments at SUEs. Comments querying the suitability of Top Wighay Farm were made by the CPRE, Linby Parish Council and Ashfield District Council and these are better attributed to Policies 2 and 3. Support for locating new employment on SUES was made most notably by Leicestershire County Council, and a range

of comments including Derbyshire County Council also expressed support for locating employment on SUES to create opportunities for economic prosperity within surrounding communities and towns.

Officer Response

3.4.8 A series of amendments have been made to the policy which address consultation comments and also reflects changes in economic development at a local and national level.

3.4.9 Office-based district job figures have been refreshed and converted into floorspace requirements. In doing this, most recent employment densities have been used to help incorporate best practice. The requirements are shown in tabular form in the justification and present a spatial distribution of office floorspace across the conurbation. This will inform a more robust approach towards planning for future office floorspace need which will occur through the production of subsequent Site Specific Development Plan Documents.

3.4.10 The approach to industrial and warehousing land has also been refined, but due to the existing over provision of industrial warehousing employment land, it does not include new floorspace or hectare requirements, but instead emphasises the need to retain good quality sites while considering poor quality sites for release for other purposes.

3.4.11 Direct reference to storage and distribution uses has been added to encourage and maximise development opportunities which have accessibility to Greater Nottingham's rail network. This responds to the findings of a study which concluded that there was no suitable location for a strategic rail distribution centre within Greater Nottingham. Without such a facility, consideration must be given to the development of smaller scale opportunities, particularly in locations which can benefit from rail accessibility. The additional wording now reflects this position.

3.4.12 Reference to the proposed Enterprise Zone at Boots Campus has been included alongside other sites mentioned in the policy. This reflects its economic status following the 2011 Budget announcement which identified the creation of 21 Enterprise Zones where large-scale employment-generating development would be focused.

3.4.13 Reference to the formation of Local Enterprise Partnerships (LEP) and their role has been made within the policy justification which also identifies the emerging priorities of the newly-established Derby-Derbyshire Nottingham-Nottinghamshire (D2N2) LEP.

| Number of Comments | Number of Consultees |
|--------------------|----------------------|
| 75 | 63 |

List of Respondents

Alan Johnson - Chairman CPRE (Gedling), Alice De La Rue - Derbyshire Gypsy Liaison Group, Allan Kerr, Anthony Crean, Ashfield District Council (Planning Officer), Asif Mohammed - Nottingham City Council, Capital Shopping Centres, Carol Collins - Rushcliffe CPRE, Chris

Key - Indigo Planning, Christina Morgan, Crown Estate, D Fixter - City Estates, David Thornhill - Campaign for Better Transport, David Ward - Wilson Bowden Development Ltd, Dr Paul Greatrix - The University of Nottingham, Dr Richard Hyde, E M Mackie - Elton Parish Council,

Emily Benskin – Deancoast, Emma Orrock - Nottingham City Council, Emma Parry - CPRE Derbyshire Branch, Fay Sexton, G Joseph, Ged O'Donoghue - Nottingham Trent University, H.W. Lawson, Ian Dickinson - British Waterways, Ian Goldstraw - Derbyshire County Council (Forward Planning), J Raven - Gotham Parish Council, Jamie Lewis - Hunter Page Planning, Jane Johnson - Linby Parish Council, Keith Fenwick Alliance Planning, Keith Spencer - Dale Abbey Parish Council, Keith Wallace – CPRE Derbyshire ranch, Kevin Brown - Nottinghamshire Police, Liz Banks - Holmes Antill, Lorraine Koban, Marion Bryce, Martin Smith - Ramblers Association, Mary Carswell - Thrumpton Parish Meeting, Matt Anderson - Victoria TRA, Michael Smith - Senior Planning Officer Government Office for the East Midlands, Mike Downes - Barratt Strategic/Westerman Homes Ltd, Natalie Sellears - Nottingham City Council, Neil Oxby - Kinoulton Parish Council, Neil Trickey, Nottingham Action Group on HMOs, Oakhill Group Ltd, Patricia Dines, Paul Kaczmarczuk - Barton in Fabis Parish Council, Paul Tame - National Farmers Union - East Midlands, Peter McCormack - Derwent Living, Richard Hyde, Robert Galij - David Wilson Estates, Sally Gill - Spatial Planning Nottinghamshire County Council, Sally Handley - Nottinghamshire County Teaching Primary Care Trust, Samuel Stafford – Savills, Sarah McCartney - Leicestershire County Council (Planning Policy), Steve Beard - Sport England, Steve Harley - East Midlands Development Agency (EMDA), T F North - Tim North & Associates Limited, Tony Morkane Derbyshire County Primary Care Trust (PCT), Ursula Dove, Valerie Glew - Erewash Borough Council (Development Management), Whitehead (Con) Ltd C/O IPlan Solutions

3.5 Nottingham City Centre

3.5.1 GOEM welcomes that Policy 5 appears to be locally distinctive, but suggests some aspirational elements be improved by addressing matters such as what new facilities will be required, or identifying the amount of additional floorspace.

3.5.2 EMDA supports the intention to promote the vitality and viability of Nottingham City Centre. The City Centre is a key driver of regional economic performance and continual improvement is needed.

3.5.3 Nottinghamshire County Council supports the emphasis on the role of the historic environment in Policy 5. Similarly, English Heritage supports the aspiration to improve access between key historic and cultural assets and reduce severance, as historic assets bring economic, social and cultural benefits and are important in their own right. A thorough understanding of key historic routes and urban form must inform major development proposals. Reference should be made to the relevant conservation area Character Appraisals, and the Urban Archaeological Database.

3.5.4 Natural England supports making the city more attractive to pedestrians, cyclists and public transport users which will bring economic, environmental and social benefits. Section 7 should refer to attracting visitors to both built (City Centres) and to natural environments.

3.5.5 Capital Shopping Centres (comments submitted by Nathaniel Lichfield & Partners) are concerned that the Policy lacks clarity in relation to retail capacity and the need for, and timing of, new development. Policy should be consistent with evidence which shows retail led development will be required at Broadmarsh and Victoria Centres to meet retail development needs in the first half of the plan period.

3.5.6 Westfield Shopping towns supports the overall spatial strategy and approach. Broadmarsh Centre is a key redevelopment opportunity and a key 'gateway' site on the south side of the City Centre and should be retained as the only focus for major retail development in the Core Strategy.

3.5.7 Marks & Spencer Plc supports Policy 5 overall, but suggests the references to a cumulative limit on retail floorspace be removed, as PPS4 only suggests that is needed if there would be an adverse impact on other centres.

3.5.8 Nottingham City Homes supports the housing issues mentioned in this section (point 6, pg 70). These are important and should help to deliver a more stable and ultimately more sustainable 'city centre living' housing market. The Community Protection team at Nottingham City Council suggest the Policy should have regard to the importance of design to minimise crime, disorder and anti-social behaviour, and deal with the impact of large licensed premises in the city centre, particularly in or close to existing hot spots.

3.5.9 Nottinghamshire Wildlife Trust suggests the policy should recognise the importance of Green and Open space and commit to protecting existing valued spaces, and creating or enhancing others. The potential for major shopping centre development to include green or brown roofs to provide biodiversity opportunities should be included as the City accommodates many species.

3.5.10 Dale Abbey Parish Council is concerned that the policy fails to recognise that Erewash is in Derbyshire and many rural areas to the west (e.g. Dale Abbey, West Hallam, Breadsall, Little Eaton, Stanley and Stanley Common) may look to Derby rather than Nottingham as the key retail and leisure centre.

3.5.11 Many responses agree that the City should be promoted as the Region's principal shopping, leisure and cultural destination. Many support the suggestion that there is no need to identify retail development opportunities at out of centre locations and policy and the wording regarding this should be strengthened and clarified.

3.5.12 One response supports 'enhancement' of the City's offer as a better defence to external threats than protection. However, use of primary shopping frontages does not support wider city centre objectives and can keep acceptable activities out of key parts of the City Centre. Regulation of some 'evening economy' uses is already provided through licensing legislation and there is therefore a risk of duplication if planning policies also seek to do so.

3.5.13 The Confederation of Passenger Transport welcomes the strategy to provide replacement City Centre bus stations and improve other bus interchange facilities, but would also welcome recognition of the role of Coach travel.

Officer Response

3.5.14 Overall, the comments received show a good degree of support for the emphasis given to Nottingham City Centre in the emerging policy as the focus for major development. The 'primary shopping frontages' approach is well established, and although the need for some flexibility is recognised within the City Centre, this is still widely supported to help maintain a focus for retail activity. It will, however, be kept under review in light of emerging national policy in relation to the use classes order and permitted development rights. The importance of sustainable design, and of the opportunities to improve open space provision and biodiversity are well recognised, but the policy is considered to provide sufficient strategic guidance. These issues will be taken forward in greater detail via separate development plan documents in due course by the City Council.

3.5.15 Some responses do raise issues which have required clarification in the policy. In particular, in terms of ensuring the policy approach fully reflects PPS4.

| Number of Comments | Number of Consultees |
|--------------------|----------------------|
| 34 | 29 |

List of Respondents

Ms Hayley Cross – NLP Ltd, Ms Alice De La Rue – Derbyshire Gypsy Liaison Group, Mr Ian Dickinson – British Waterways, Mr Mike Downes – Barratt Strategic, Ms Christina Dyer, Mr Michael Fearn, Mr Robert Galij – David Wilson Estates, Mr Tom Gilbert-Wooldridge - English Heritage, Mrs Sally Gill – Nottinghamshire County Council, Ms Valerie Glew, Sally Handley, Mr Steve Harley - EMDA, Ms Caroline Harrison - Natural England, Mr & Mrs G.C. Jackson,

Mrs Gaynor Jones Jenkins – Notts Wildlife Trust, Mr G Joseph, Mr. Chris Kemp, Dr Rick Keymer, Neil Oxby – Kinoulton Parish Council, Mr Dan Lucas – Nottingham City Homes, Mr Peter McCormack – Derwent Living, Ms Emma Orrock, Mr Michael Smith, Mr Michael Smith - GOEM, Mr Keith Spencer – Dale Abbey Parish Council, Mr David Ward – Wilson Bowden Development, Mr S Wood – Westfield Shoppingtowns, Capital Shopping Centres, Marks and Spencer Plc, Confederation Of Passenger Transport UK, Nottingham Action Group on HMOs.

3.6 The Role of Town and Local Centres

3.6.1 The intention of the policy to protect vitality and viability was supported by respondents including EMDA, although the need for clearer definitions of 'vitality' and 'viability' was identified along with suggestions as how to define them. There was also general support for the identified hierarchy of centres, although the designation of a number of centres was questioned and the variation in the level and scale of services between centres was identified.

3.6.2 There was disagreement over the designation of Sandiacre (Erewash Borough) between those who supported its identification as a Local Centre and those who felt it should be a Town Centre in order to deliver a hierarchy over the course of the plan period. Kimberley should also be upgraded to a Town Centre to reflect its importance and role within Broxtowe. Bestwood Village (Gedling Borough) was identified by a respondent who felt there was scope to identify a Local Centre there. Proposals to include a supermarket at Keyworth were opposed by a number of respondents from Rushcliffe Borough.

3.6.3 There was support for the identification of under performing centres especially in relation to Cotgrave. A number of respondents including EMDA identified that the proposed development of Cotgrave and adjoining land may potentially play a major role in improving the Centre. However, one respondent opposed the identification of Cotgrave as under performing as it was not identified as such in the Retail Study.

3.6.4 The proposals regarding new retail development of an appropriate scale as part of a number of Sustainable Urban Extensions and Regeneration areas was generally supported by respondents including EMDA and developers. However an issue was raised in relation to new retail at Gamston by a respondent who felt that links to existing retail provision should be made first.

3.6.5 The role and function of centres was identified as a key issue. The importance of cultural activities was raised by both the The Theatres Trust and Nottingham City Council. The need for leisure and cultural activities of an appropriate scale and kind in smaller centres was seen to contribute to vital and vibrant town centres. The importance of library services should be highlighted as recent experiences in Birmingham, Manchester, Liverpool and Newcastle shows. The policy should also consider enhanced roles for local service centres in the rural parts of Greater Nottingham and should respond positively to the latent retail needs of Bingham and its catchment area.

3.6.6 Nottingham City Homes noted the importance of centres to low income communities. A range of retail within accessible locations can help permit healthy living choices as well as access to other commercial services. Opportunities to use housing to maximise the chances of success of the centres should be taken.

3.6.7 A number of developers felt that some of the wording used in the policy was unnecessarily restrictive and suggested alternative wording. One felt that there should be an acknowledgement that it is not appropriate for all retail uses to locate in centres due to congestion issues. There were also calls from those with interests in retail parks, including Victoria Retail Park (Gedling Borough) and Castle Meadow Retail Park (Nottingham City) to designate them as centres to recognise the roles they play and allow growth.

3.6.8 PPS4 confirms that it is no longer necessary to demonstrate a need for new retail development in out-of-centre locations and therefore this reference should be deleted from the policy. Furthermore there is no recognition of the need to broaden and enhance consumer choice and increase competition within the Core Strategy, with PPS4 referring to the Government's objective to increase competition between retailers and enhance consumer choice.

3.6.9 GOEM have identified a number of areas in the policy where further work is needed. These include:

Combined or individual floor space figures to provide adequate strategic guidance;

The status of Hucknall should be clarified due to a difference with Ashfield District Councils Options document

The terms 'appropriate scale' and 'lesser scale' should be defined in terms of new major residential-led development

3.6.10 In addition, respondents identified that the policy lacks reference to the existing or potential role of the historic built environment in local centres. Local distinctiveness is worth supporting which by no means relies solely on designated assets

Officer Response

3.6.11 Careful consideration has been given to consultation responses promoting the re-positioning of identified centres within the Policy's proposed retail hierarchy. In assessing the merits of each, councils were mindful of evidence produced from independent retail studies covering the Greater Nottingham area. These studies collectively proposed a recommended network and hierarchy of centres across the conurbation as a way of promoting a balanced and strategic approach to providing for future development needs. Proposals to alter the position of centres were extensively considered, but ultimately not accepted as changes to their role would risk unbalancing the hierarchy and potentially threaten the health of nearby centres. The inclusion of several areas as new centres were also promoted in response to the consultation. For similar reasons given to the re-positioning of centres, the inclusion of these areas (mainly established retail parks) is not supported as it isn't considered that these offer a balanced range of community facilities and services which city, district, local or neighbourhood centres are typically expected to provide for local residents.

3.6.12 Centres previously identified within Rushcliffe and Hucknall (Ashfield) have now been removed from Policy 6. This is as a consequence of each Council preparing its own separate Core Strategy. However, retail policies in each document will still be based upon common evidence covering the Greater Nottingham area which promotes a conurbation-wide approach to planning for the needs of its town and local centres in a balanced manner.

3.6.13 To aid understanding of key retail terms, definitions of 'vitality' and 'viability' have now been added to the glossary of the Aligned Core Strategies document.

3.6.14 A number of respondents criticised the draft Policy's heavily restrictive approach towards new out-of-centre retail and leisure development. Upon review it was felt that this did not necessarily reflect the current position of national planning guidance. Therefore wording which establishes the councils stance on controlling retail development in out-of-centre locations has been amended to accord with current Government guidance. Additionally, a new element of this policy now gives councils the flexibility to define and set thresholds for the scale of main town centre development in edge-of and out-of-centre locations through subsequent Development Plan Documents. Councils will be expected to justify such an approach with robust evidence relating to their identified centres.

3.6.15 In response to comments suggesting that Policy 6 fails to recognise the existing or potential role of the historic built environment in local centres, it is worth highlighting the amended content of Policy 10 of the Aligned Core Strategies. This acknowledges the importance of reinforcing valued local characteristics around Greater Nottingham (both inside and outside of local centres). The policy also identifies the role new development can play in helping to enhance local identity through improving the public realm includes the setting of heritage assets.

3.6.16 The contribution made by culture within centres was also raised in responses to the consultation. Policy 6 currently acknowledges the importance of centres in helping to maintain their vitality and viability by promoting the widening of uses (whilst maintaining a mainly retail character) as a way of achieving greater diversity. Policy 13 of the Aligned Core Strategies supplements this approach and recognises that the protection of existing and the development of new cultural facilities is an vital factor in maintaining a good quality of life for Greater Nottingham's residents and visitors.

| Number of Comments | Number of Consultees |
|--------------------|----------------------|
| 60 | 55 |

List of Respondents

Aldi Stores Ltd (2), Mr Martin Allen, Mrs Olda Allen, Mr Andrew Astin (Indigo Planning), Ms Liz Banks (Holmes Antill), Mrs Emily Benskin (Deancoast), Mr Kevin Brown (Nottinghamshire Police), Butler (Icon Business Centre), Capital Shopping Centres, Mrs Carol Collins (Rushcliffe CPRE), Crown Estate, Ms Alice De La Rue (Derbyshire Gypsy Liaison Group), Mr Ian Dickinson (British Waterways), Mr Mike Downes (Barratt Strategic), Ms Christine Dyer (Nottingham City Council), Mr Keith Fenwick (Alliance Planning), Mr D Fixter (City Estates), Foster (Icon Business Centre), Mr Rogers Foxall (Langridge Homes), Ms Rose Freeman (The Theatres Trust), Mr Robert Galij (David Wilson Estates), Ms D Gilhespy (EMDA), Mrs Sally Gill (Spatial Planning Nottinghamshire County Council), Ms Valerie Glew (Development Management Erewash Borough Council), Mr Ian Goldstraw (Spatial Planning Derbyshire County Council – 3), Mr Paul Green (2), Sally Handley (Nottinghamshire PCT), Mr Steve Harley (EMDA – 2), Dr Prue Hobson-West, HSBC, Mrs Catherine Haskew, Mr G Joseph, Chris Kemp, Mrs HW Lawson, Ms Lorraine Koban, Mr Sidney Leleux (Risley Parish Council), Miss KE Logan (Bartons Public limited Company), Mr Dan Lucas (Nottingham City Homes), Miss E Mackie (Elton Parish Council), Mr Steve McBurney (Commercial Estates Group), Mr

Peter McCormack (Derwent Living), Nottingham Action Group, Ms Emma Orrcock (Nottingham City Council), Mr J Potter (Ruddington Parish Council), Ms Natalie Sellears (Nottingham City Council), Mr Michael Smith (GOEM), Ms Hayley Sowter (Derwent Living), Mr Keith Spencer (Dale Abbey Parish Council), Mrs & Mrs Pat Stuar, The Co-operative Group, William Davis Ltd, Wm Morrison Supermarkets, Mr David Ward (Wilson Bowden Developments), Mrs Whitt, Ms Purnima Wilkinson (East Midlands Housing Association).

3.7 Regeneration

3.7.1 Nottinghamshire County Council suggest that in part 1 of Policy 7 "leisure" should be replaced by "sports and leisure" to recognise the role of sport in regeneration.

3.7.2 GOEM suggest that more detail is required, including principles for the type and amount of floorspace at regeneration zones, and that it should be made clear that boundary definitions for regeneration zones will remain as in the saved Local Plan.

3.7.3 The Environment Agency welcomes the proposed policy which provides the opportunity to regenerate land potentially affected by contamination. Regeneration should be accompanied by searches and remediation in line with PPS23. EMDA supports the partnership approach to regeneration across the conurbation, with shared visions and aligned investment planning seen as essential to maximise the regeneration outputs and outcomes.

3.7.4 The Coal Authority support regeneration of former industrial and mining sites, and are keen that the Policy helps ensure that masterplans or allocations reflect mining legacy issues in accordance with the advice set out in PPG14.

3.7.5 Natural England are keen to see existing biodiversity on brownfield sites considered, and enhancements made through development by 'designing in' biodiversity interests from the outset. English Heritage welcome the Policy's reference to the importance of historic and cultural assets.

3.7.6 Nottingham City Homes commented that regeneration is a vital component of the Aligned Core Strategies (ACS), and that the importance of Strategic Regeneration Framework (SRFs) and neighbourhood plans should be more explicitly noted. The ACS must prioritise regeneration to reduce potential for SUEs to undermine the market for housing in regeneration areas. In delivering economic conditions may extend likely delivery period for sites. The Culture and Community Services Department of Nottingham City Council support the policy overall but suggest the text should give more detail about what is considered to be appropriate regarding the cultural and community functions of the defined sites and the areas they serve.

3.7.7 One developer suggests it is unlikely that the regeneration sites will deliver the required level of housing allocated (as relevant in Policy 2) within the timescales of the Core Strategies. The Rolls Royce site is seen as an unsustainable location for mixed-use regeneration, and should be replaced by Bestwood village as a regeneration priority. There was also concerns regarding the failure to identify additional or fallback sites for regeneration. A developer's representative suggests the Policy should reflect the potential for the Nottingham Forest City Ground, and Nottingham Airfield to come forward as a potential major regeneration sites.

3.7.8 Another private sector interest suggests that while regeneration is a key objective, it must not be supported at all costs – a balanced approach to development is required to deliver the economic objectives. One response calls for additional guidance in the policy on how competing local interests across the conurbation will be managed.

3.7.9 There was broad support from a number of respondents for the specific regeneration areas are supported, including the Regeneration Zones within Nottingham City Centre, Gedling Colliery, Stanton Ironworks and the mixed use regeneration at Cotgrave Colliery. Regeneration must be delivered in a comprehensive, coordinated and sustainable manner.

3.7.10 There were a number of comments regarding Stanton Ironworks, with many such as the CPRE supportive of the principle of redevelopment, and keen to see a scale and type of development which reflects the site's transition between urban and rural areas. A critical issue identified by many is the relationship and links between the site and central Ilkeston, Sandiacre, and Nottingham, and ensuring that the regeneration directly and measurably benefits existing communities. Alliance Planning suggest that the Policy should be amended to remove the 'nil detriment' ('without prejudice') approach to Stanton in terms of the impact on current infrastructure. Phasing of delivery information should also be added.

3.7.11 Others are opposed to development options for Stanton Works which would cross and damage fragile Green Belt surrounding the site, and threaten wildlife found there. Others feel the existing road infrastructure around the Stanton site requires significant improvement, and a new M1 junction should be provided if development is to proceed. Some responses object to the fundamental approach of the strategy for Stanton, feeling that local economic regeneration will not be delivered by one large housing development site, and that the site should remain in economic or industrial use. Others question the sustainability of the location of Stanton Works for development, and whether in such an isolated location it will meet local social and economic regeneration needs.

3.7.12 Many responses support the redevelopment of the Cotgrave Colliery site for housing and other uses, including offices or small industrial units. Some respondents suggest that the site could accommodate more than 500 homes. In taking the site forward one response suggested a shuttle bus service to Cotgrave, cycle routes, and limited impact on the canal must be ensured. Extension to include the Hollygate Lane site was suggested, as was ensuring regeneration benefits the existing town.

3.7.13 However, there was some concern about the scale of the proposals. Regeneration in Cotgrave would be better served by the redevelopment of the colliery site for employment and recreation, or as a transport interchange, rather than for large-scale housing development. Others object to the site being redeveloped, feeling that local building around smaller towns and would be more appropriate. Some responses question the justification for the site's redevelopment, including how it benefits the existing community. Numerous responses suggest that Cotgrave does not have the social structure to support regeneration of the colliery which might generate problems such as crime, traffic and pollution, and additional pressure on already constrained local schools, as well as creating pressure on the Green Belt for additional development. There were also concerns about the potential loss of wildlife on the site.

3.7.14 One response identifies the significant employment development for Southside and Eastside Regeneration Zones, and welcomes the proposed provision of new retail, social, leisure and cultural development which will revitalise poor quality areas. Another identifies the benefits Southside will have on the Station 'Hub' scheme to encourage shift from road to rail. Also east-west transport benefits and new links via Waterside.

Officer Response

3.7.15 While there was a range of comments submitted, including a number of objections in relation to specific proposed regeneration sites, many of the responses also endorse the approach taken, and support the key regeneration sites or locations identified. However, a number of issues raised via the consultation have been clarified to better reflect progress or changes made since.

3.7.16 However, some important issues and questions were raised, and more thought given to how to respond to them. In particular, the assumed phasing or timing of development at regeneration areas or sites has been revisited in taking the Core Strategies forward, both in the context of the work to revisit the Greater Nottingham housing allocations, but also to reflect the evidence gathered in preparing the Infrastructure Delivery Plan. This also enables a clearer definition of specific, allocated sites expected to be delivered in the short-term, as opposed to broad locations expected to see development in the longer-term. In terms of the calls for additional detail regarding the mix and types of land-uses at particular sites, the proposal is that this will be provided in future local Development Plan Documents produced at the local authority level.

| Number of Comments | Number of Consultees |
|--------------------|----------------------|
| 633 | 688 |

List of Respondents

Mr Adrian Adkin, Mr Paul Aikens, Ms Supriya Akroyd, Ms Catherine Alderson, Mr Colin Aldworth, P & WSH Alexander, JA & K Allan & Threapleton, Mr Matt Anderson - Victoria TRA, M J Anderson, Mr Gary Arkless, JW Armstrong, UG Ashcroft, Miss S Askem, Ms Belinda Asquith, A Atkinson, Mr & Mrs CR & PJ Attewell, Mr William Bacon, D Bailey, Mr & Mrs Bailey, Mr Roger Baird, Mr M Baker - Rushcliffe Residents Association, Mr Graham Baldry, Mr J W Baldry, Mr Andrew Baldwin, Professor Frank Ball, M G Banbury, Ms Liz Banks - Holmes Antill, Steven Banks, Mr Michael Barker, Mr Ray Barker, Mrs PA Basford, Mrs V Bates, Miss P Bates, Mr Steve Beard - Sport England, D Bell, Mr EB Bell, Mr EB Bell, RH Bellamy, Mr & Mrs JP & CD Bennett, Ms Julia Bennett, Mr Michael Bennett, J Bennett, ER & S Bennett, Mrs Emily Benskin –Deancoast, Mr E Best, Mr Malcolm Bibby, Mrs J Biggins, Mr & Mrs PW & SJ Bilzon & Simnett, Natasha Blackburn, Mrs N E Blackmore, Mr Dan Bloomfield, Mr DB Boggild, Ms Ashleigh Bond, Mr Christopher Bostock, Stuart & James Botterill & Broughton, Mr Barry Bottomley, Ms Alison Bottomley, Mr & Mrs A Brace, Elizabeth Brackenbury, Mr Cavan Bradford, Ms Karis Bradford, Ms Linda Bradford, Marcia Bradshaw, BA Bramley, Mr Bryan Brears, Mrs Ann Brereton, Mrs MI Brereton, Luke Brindley, P Brooker, Ms Joanna Brookes, Mr Andrew Broughton, Ms Lisa Brown, Mr Kevin Brown - Nottinghamshire Police, Mr Nigel Brown, Mr & Mrs A Brown, Brown, JK Browne, Ms Julie Bruce, Bryan Brunt, Mr Philip Buckby, Mrs H R Bull, Ms Penny Bunn, Mr Philip Burghar, Mr Peter Burnett, Mr John Burton, Miss Rachael Bust - The Coal Authority, James & Patricia Bust, C Callison, Mr Andrew Cameron, Capital Shopping Centres, Ms Diane Carnill, Barry Carr, Ms Mary Carswell - Thrumpton Parish Meeting, A Carter, Miss S Carver, Ms Charlotte Caven-Atack, Mr MS Cawthorn, Mr Chris Charter, Ms Carrie Chalmers, Mr John Chalmers, JV Childs, A Chilton,

Mr Jonathan Chubb, Mr Geoffrey Chubb, Ms Frances Church, Mr AJ Clark, Miss NR Clarke, Mr K M Clifford, Brian Cohen, Shirley Cohen, Mr & Mrs Coleman, Josephine Collington, Mr John Collins, Mrs Carol Collins – Rushcliffe CPRE, N Conway, Mrs Elizabeth Cooper, Mr Paul Cooper, Ms Susan Couldry, Mr Paul Cowland, Michael & V Cragg, Mr Ian Craig, PJ Croclew, Susan Crooks, Mr Robert Crosby, P Croshaw, Crown Estate, Ms Julia Cudbard, A A H Cunningham, Mrs M Cunningham, Ms Georgina Cursham, GN Cutts, Mr B Dale, Christine Dale, Mr Phil Daniels, Mrs P Darras, Mr Stewart Davidson, R Davies, RP Davies, Ms Alice De La Rue - Derbyshire Gypsy Liaison Group, C Deakin, Mrs P Dean, Mr & Mrs L & R Demaine, J Denham, G Dennis, Mr Ian Dickinson - British Waterways, Trish Dickson, Mr Robert Dixon, Mr Tim Dobson, Mrs Shirley Dooley, Mr Mark Doughty, Mr Alan Douglas, Ms Bernadette Downe, Mr Mike Downes - Barratt Strategic/Westerman Homes Ltd, Mrs B Downing, A Downs, Mrs L Dransfield, MD Dugan, P Dugan, Ms Christina Dyer - Nottingham City Council, G Dymond, Mr K. Eaton, Ms Linda Eccles, Mr & Mrs P Eden, M Edwards, Mrs A Ellis - Cotgrave Town Council, Ms Elizabeth Evans, Miss Ruth Evans, J Evley, Mr Graham Ewing, Mr R S Exton, RE & M Fardell, Mr Chris Farrelly, Mr Keith Fenwick - Alliance Planning, Anne E Ferguson, Leanne Ferguson, Elaine Ferguson, Mr Alastair Ferraro, Mr J Firth, Mr D Fixter - City Estates, Mr & Mrs N P Fowler, AE Fox, Mr Rogers Foxall -Langridge Homes, G Fraser, A Freestone, Ms Donna Frend, Mr Keith Frend, Ben Frodsham - Turley Associates, Mr & Mrs Fryer, Ms Sue Furness, Mary Gadd, JC Gale, Mr Robert Galij - David Wilson Estates, Matt and Lisa Gapp, Colleen Gardener, L Garton, A M Geary, Mr Tom Gilbert-Wooldridge - English Heritage, Anne Gilbey, N Gilbey, Ms D Gilhespy - East Midlands Development Agency, Mrs Sally Gill - Nottinghamshire County Council, Mrs C E Gill, S S Gill, T Gillott, Ms Valerie Glew - Erewash Borough Council, Mr T Glover, Mr David Godson, Mr Adrian Goose, Mr Mike Gordon, Mr Paul Green, Mr Chris Green, Mr RW Green, Mr David Greenwood, Mr Ian Gregson, Mr David Griffiths, Ms Shirley Gunn, Mr Martin Gunn, Mr William Gunn, S Gunn, Mr Jonathan Gutteridge, Mr Roy Haines-Young, Eileen & Brian Hall, Mrs A Hallam, Mr & Mrs David Hallett, Mr John B Hallsworth, Mr Russ Hamer, Mr David Hammond, Ms Pippa Hand, William Handbury, Sally Handley -Nottinghamshire PCT, Mrs A Harding, Mr Robert Hardisty, Mr David Hardwick, Mr Steve Harley - East Midlands Development Agency, Mr and Mrs Harms, E Harpham, Mr Richard Harris, Ms Joanne Harris, Mr Jonathan Harrison, Mr Clifford Harrison, Ms Caroline Harrison - Natural England, J Harrison, Ms Eileen Haselden, D & J Haskell, Mr Anthony Hatfield, Mr John Hayes, RD & H Head, Mrs P Head-Rapson, Mrs JM Healy, M Heard, Ms Susan Heath, Mr K A Hemsell, M Henderson, Mrs M Heys, Mr Colin Hickinbottom, Mrs SB Highley, Mr DE Highley, Ms Lindsey Hill, Mr Philip Hill, Mr D Hind, J Hodges, D & N Hodgkinson, Mr Albert Hogg, Mr Stephen Hogg, Mark Hogg, R Hogg, Mr Stuart Holden, Mr Steven Holley, Unk Holmes, J F Holtham, Mr Philip Hopewell, JP Hopkinson, Mr Andrew Horrocks-Taylor, M Horseman, Mr & Mrs Howard, Mr Simon Hudson, B Hunn, Mr LG Hunn, Ms Jackie Hutton, Ms Heather Ingham, Ms Rachel Inman, Mr Mark James, Mr Lee James, Mrs Resil Jarrett, AH Jenkinson, Ms Joanna Jevons, Glen Jobson, Mr Steven Johnson, Mark G Johnson, Mr Nick Johnson, J Johnson, Mr G Joseph, Mr & Mrs GG Justice, Ms Claire Kay, Mr Tom Kay, Mr Declan Keegan, Joan Keelin, Mr CJ Kelby, Ms Adrienne Kelly - Nottingham City Council, J Kendal, M Kennedy, K, B & L Kennedy, J.G Kerr, Dr Rick Keymer - Natural England, Mr and Mrs Kidger, Mrs Stephanie King, PWE King, Anthony King, Mrs A King, Ms Sheila Kingdom, Mr Graham Kirby, Mr Gary Kirby, Mr Barry Kirke, Mr and Mrs Geoffrey Kirkland, Ms Lorraine Koban, Mrs Deborah Leatherbarrow, Mrs Deborah Leatherbarrow, Ms Amber Leggett, Mr Graham Leigh-Browne, Mr Jamie Lewis - Hunter Page Planning, Mrs JA Ley, B Lilley, Mr JT Lindsay, Mrs B Lindsay, Ms Elizabeth Lister, David Loach, Mrs A Logue-Worgan, Mr & Mrs DA & EA Lothian, Mr. James Lowe, Mr Dan

Lucas - Nottingham City Homes, Mr Gary Lund, Mr Colin Maber, Mr Ian Machan, A Mack, Miss E M Mackie - Elton Parish Council, G Madgett, R Mansfield, Mr John Mapperley, Mr & Mrs A & M Mark, Mr Kevin Markland, Mr Trevor Marriott, Muriel Marriott, Mrs Jennifer Marshall, Mr Noel Marshall, M Marson, Ms Claire Martindale, Mrs F Mason - Rushcliffe Conservative Association, Mr JW Mather, Ms Susan Matthews, Mr Steve McBurney - Commercial Estates Group (CEG), N McCann, J McCann, Mr Alistair McCulloch, Mr & Mrs McDonald, Mr Gerald McDonough, Mr Richard McDonough, Mr PF McGowan, Mr Ian McIntyre, Mr Justin Mclarney, CW & H McLean, Mr and Mrs Michael Mcloughlin, IM & C McMurdo, Mr Roger McMurray, Mr & Mrs P McNab, Mr & Mrs W & Diane McNair, Deborah Mears, Stephen Mears, MR Meese, DH Mehew, Miller Homes Limited, Mr Martin Miller, Mr & Mrs R Millhouse, Mr Nick Mills, M Millward, P Mohandas, Ms Kristine Mole, Mr James Morley, B Moverley, Miss Rebecca Muir, Mr John Murray, Dr David M G Myles, Mrs Mary AL Myles, Julie Napper, Mr & Mrs D B Nason, Lilian Neely, Mrs Carina Neil, Ms Kirsty Nelson, R News, Mr & Mrs JM & JM Nichol, Mr Nick Noble, Ms Jean Noblett, Mr Pat Norton, Nottingham Action Group on HMOs, Oakhill Group Ltd, Conrad Oatey, Ms Carla O'Brien, Mr & Mrs PN Ogle, Ms Emma Orrock - Nottingham City Council, Ms Karen Osborne, P Osborne, Ms Sonia Ostapjuk, G & B Panter, Mr Thomas Parker, Mr Jim Parkhouse, Ms Emma Parry, Ms Sheila Payne, Ms. Peach, Mrs C Peet, Dr Penn, Ms Kathryn Penn, Ms Marion Penn, Mr & Mrs Tony & Wendy Perkins, Mr Derek Perkins, Mr David M Perry, Miss EJ Philbin, Mr & Mrs A Philbin, D C Phillips, Mr John Pichota, JM Pickard, Ms Delia Pickerill, Mr RH Pickerill, Pickering, Pickworth, Ms Carol Pierrepoint, Denys J Piggott, E Plant, Mrs S Plowright, Anna Poole, Marion Potschin, Mr Tim Potts, Joyce Pownall, Mr Geoffrey Prett, Ms Lynn Priestley, Mr John Prince, J Pringle, CH & S Proom, Mr Trevor Pull, Tracey J Purdy, Mr J Pye, Mr & Mrs Rally, Mrs W Randall, Avril Rathbone, Ms J Raven - Gotham Parish Council, Mr Matthew Ray, Ms Chris Read - Nottingham City Council, Ms Kate Read, Mr Jeff Reddhaw, E Richards, J & S Richards & Spencer, Mr & Mrs PJ & LA Richardson, Mrs Julie Richmond, K Riddell, J Riddell, Mr Carl Riddle, Mr and Mrs Riley, Mr Ken Roberts, Mr Phil Roberts, Mr Simon Robinson, Ms Rachel Robinson, Mrs G Robinson, J Robinson, Mr & Mrs J Robinson, Gareth Robinson, MJ Robinson, Patricia J Rose, Barbara Ross, M Rourke, Ms Fiona Royce, Ms Hazel Salisbury, Mrs A Sanderson, Mr Mark Saunders, Mr Mark Saunders, RL Savage, D Schade, Mrs LB School, J Scotney, F M Scotney, Ms Natalie Sellears - Nottingham City Council, Mr & Mrs MS Sellwood, Mrs Fay Sexton, Ms Miranda Seymour, J Seymour, Ms Rosie Shaw, Ms Rae Shaw, Cllr Ian Shaw, DM Shearan, Mr Tim Shephard, Shepherd, JA Shepherd, David Shepherd, CS Sheppard, B Sheppersan, R & DE Simkins, David Simpson, Mr David Simpson, Rhona Sinclair, Mr Alex Skelton, Mrs E Slater, Mr Arthur Sleep, RM & V Smart, Mr Nick Smith, Mr & Mrs D Smith, Mr Martin Smith - Ramblers Association, Cllr Philip Waldram Smith, Mr Michael Smith - GOEM, Ms Janet Smith, Mr & Mrs E Smith, Christine Smith, Mr & Mrs Paul & Yvonne Smith, Mr Paul Smith, Julie M & J & Malcolm Smith, Mr & Mrs A & E Smith, Mr & Mrs Paul & Yvonne Smith, S Smith, SNW Smith, Mr. Michael Snaith - Inland Waterways Association, Brian & Sandra Soad, H M Soiris, Mr Paramjit Somal, J Southen, R Southern, Mr & Mrs D Southern, EJ Spencer, M Spencer, Mr Keith Spencer - Dale Abbey Parish Council, EJ Spencer, Prof. Anthony Stace, Mrs P Stace, R Staley, Mr Robert Stanley, Mr Kevin Sterry, Ms Vandra Stewart, Trish Stewart, JA Stockley, P Stockton, Lynn Stultz, Chris Swallow, P Tally, Ms Tracy Taylor, MB Taylor, Glennis P Taylor, Mr Phillip A Taylor, C Taylor, Mrs. Sandra Teece, J Thomas, Mr & Mrs Francis S Thomas, Pamela Thomas, Ms Clare Thompson, Tillbridge Developments LLP, Dr Walid Tizani, Mr Ralph Todd, Mrs A Toombs, HC Toombs, J Towle, Ms Jennifer Tranter, Mr Mary Trease, Neil Trickey, Ms Alexandra Tuckwell, Anita Turnbull, Ms Angela Turner, Mrs & Mrs V Turns, W Tustin, Ms Lynn Tyson, Mr Andrew Tyson,

Martin Unk, Mr Chris Upton, K Varney, Mrs EA Varney, E & D Varney, Mrs B Venes, Mrs Karen W, Mr David Waite, Mr John Walker, S Walker, Mr Keith Wallace - CPRE Derbyshire Branch, Mr Keith Wallace - CPRE Derbyshire Branch, Mary Walton, Mr David Ward - Wilson Bowden Development Ltd, MO Ward, Ann & R Warren, Mrs Margaret Warsop, J Watson, Ms Penelope Watson, Cliff Way, G & P Webster, MJ & P Webster, Mr PB Wells, Ms Janet West, Wheeldon Brothers Ltd, Mr & Mrs R & M Wheeldon, Sheila D Wheeler, KJ Wheeler, Ms Hilary Whitby, J White, Ms Elizabeth Whitehead, Mrs PM Whitehead, Mr Keith Whitehead, D & E Widdicks, Mr Colin Wightman, Ms Jean Wightman, BE Wilcox, William Davis Ltd and Taylor Wimpey Developments Ltd, Ms Clair Williams, Ms Nicola Williams, Mrs J Williams, Mr John Willis, S V Willis, Mr Peter Wilson, Mr Ian Wilson, Miss Naomi Wing - Environment Agency, J Winstanley, Mrs M Wood, Mr S Wood, Mrs MA Wood, Mr Peter Woodhead, Mrs M Woodhead, Mr Bob Woollard, Andrew Martin Associates, Mr Paul Worley, Claire Worthington, Mr Mark Worwood, Mrs Diane Wright, MJ Wright, Ms Hazel Wright, Mr Keith Wright, Mr Lee Wright, Bev Wynne, P F Young, The New Aspley Gardenholders Ltd., Tim, Lily, Lee.

3.8 Housing Size, Mix and Choice

General Comments

3.8.1 There have been some concerns raised that, apart from the first part of the policy that deals with Nottingham City Centre, the policy is vague and generic. There has been a mixed response in relation to the overall structure of the policy. A number of respondents, including developers, believe that the policy is too prescriptive and will not allow planners to make exceptions to the rules. Other respondents, including some developers and Derbyshire County Council, feel that the policy offers a degree of flexibility that will allow local circumstances to be taken into account.

3.8.2 Certain parish councils have emphasised the need for affordable housing and a mixed housing stock. Other Parish Councils have stressed that they consider there is a need for a particular type of housing. In particular, Ravenshead Parish Council would prefer future provision to be for the elderly while Awsworth Parish Council would prefer to see larger family houses within the village. As a result of research carried out for its Village Plan, the Keyworth Village Plan group would wish to see intermediate housing or any housing product designed for young people to get onto the housing ladder.

3.8.3 A number of respondents have objected to the requirement that a proportion of new homes to be built to the Lifetime Homes Standards as such a requirement is in advance of national targets without justification. One comment suggests that the adoption of such standards at the policy stage would not be flexible enough to adapt to changing markets throughout the plan period. The lack of precision in terms of which "recognised national guidelines" it intends to apply to ensure adequate internal living space has also been raised as an issue.

3.8.4 There have been some points raised that with the move towards zero carbon by 2016 and the associated cost of this, the provision of affordable housing may become a trade-off to offset the increased costs.

3.8.5 A number of respondents have commented that housing mix, overall densities and the provision of affordable housing within larger developments should come through Development Briefs. Some respondents also believe that applying a minimum density across the plan area is not appropriate as it does not take into account the different characteristics of particular communities.

Mix

3.8.6 Concerns have been raised that the emphasis on family housing within Nottingham City could potentially lead to decreasing densities which would result in greater pressure to release land within other Districts to achieve the overall housing targets and that such an approach may be inconsistent with PPS3. Conversely, other respondents have supported the focus on family housing as it may lead to a better balance in the housing supply.

3.8.7 Some respondents have commented that high density, purpose-built student housing should be used to meet any additional student accommodation needs which arise from such a policy, and that an approach to student accommodation should be contained within the

policy. However, there is some concern that too many student flats have been provided already within Nottingham. It has also been stressed that whilst the main concentration of Houses in Multiple Occupation for students is within Nottingham City, there are also concentrations within Rushcliffe and Broxtowe.

3.8.8 Furthermore, a comment has been made that is not physically or financially possible to maximise the number of students occupying purpose built accommodation, and that for many second and third year students, living in households as part of the wider community is part of the experience of university life. The respondent also believes that the positive impact students can have in many areas of the community, including very significant volunteering activity, should be acknowledged.

3.8.9 The need for the policy to outline a strategy for existing housing stock and specifically small developments, conversions and houses in multiple occupation (HMOs) and their impact on the community and environment has been raised.

3.8.10 There have been a number of site specific comments from site promoters that a particular site or Sustainable Urban Extension could provide an appropriate housing mix.

3.8.11 The importance of viability in relation to both housing mix and the level of affordable housing was identified by a number of respondents as being important. One respondent felt that smaller developments should be excluded from the affordable housing requirement as it will render them unviable.

3.8.12 Some responses have suggested that the provision of specialist housing for specific groups will help to free up family housing. However, concerns have been raised that the ambition that all new developments should lead to the creation of "mixed and balanced communities" implies a drive to create in future uniform settlements, all of the same character and that this element of the policy goes beyond paragraph 22 of PPS3.

3.8.13 A number of comments have stated that the creation of new residential developments requires vision and imagination and should take account of what residents want to see.

Affordable Housing

3.8.14 There was some support for the detailed approach on Affordable Housing being established in separate DPD's for each authority. There was also support for the identification of variable affordable housing targets at a District level, given the variation in viability and differing levels of need and demand. However, there was also seen to be insufficient emphasis placed on "robust evidence of local need" for the setting of affordable housing targets and justification was required for the different approach for the threshold for affordable housing compared to Gedling Borough Council's Affordable Housing Supplementary Planning Document. One respondent wanted the issue of tenure split to have more open deliberation and the adoption of a flexible approach for this issue.

3.8.15 One respondent suggests that there is no recognition of the fact that gypsy and traveller residential sites demand a different approach.

Rural Exception Sites

3.8.16 CPRE Derbyshire, CPRE Nottinghamshire, and a number of Parish Councils welcomed the flexibility in Section (3) of the Policy to allow rural exception sites in response to clear evidence of local need where these will stay affordable in perpetuity. CPRE Nottinghamshire would prefer a plan-led approach with sites allocated specifically for affordable housing rather than the lottery of exception sites. A comment has also been made that rural exception sites should be identified in consultation with local communities. However, The Keyworth Village Plan Group consider that a rural exception development could be appropriate for Keyworth but this is not possible under current legislation.

Viability

3.8.17 There has been a suggestion that the Greater Nottingham councils carry out a general assessment of the viability of a plan-wide affordable housing target.

3.8.18 There have been concerns raised about using a toolkit at site level as toolkits struggle to deal with larger development sites with prolonged build-out periods. In addition, there was some disagreement from the development industry with the trend towards detailed site-by-site viability assessments because, they argue, this is chiefly a mechanism devised in order to capture the maximum amount of development value, something which is contrary to the purposes of land use planning and the approach within Circular 05/2005. Another concern states that the proportion, mix and threshold for affordable housing through cross subsidisation from other uses within the development and use of the site viability assessments to establish an appropriate level of provision is a form of taxation.

3.8.19 There was also support for section 2 which states that affordable housing delivery is contingent upon an assessment by the council concerned of the cumulative impact of other policies on viability and recognition that this can be an obstacle to delivery and that bespoke financial modelling is likely to be necessary. However, the policy should be clear that the purpose of such assessments is to enable an understanding of how planning gain can best be used to achieve spatial planning objectives.

Officer Response

3.8.20 A number of adjustments have been made to the policy in response to calls to incorporate additional local issues when looking at housing mix. Reference to elderly accommodation in areas of under occupation has been included which may help to free up family houses in a number of areas.

3.8.21 It is agreed that the reference to recognised national standards and lifetime homes should be removed. 'Lifetime Homes' is a concept that could be altered, removed or replaced during the Core Strategy's plan period. Therefore, it is better to refer to a general requirement to seek a proportion of homes capable of being adapted to suit the lifetime of the occupants.

3.8.22 It is still considered appropriate for the housing mix on larger sites to be determined on a site by site basis through development briefs or other Local Development Documents. It is agreed that an area's character should be a determining factor when looking at appropriate mixes of housing, especially with the removal of minimum density targets and the removal

of garden land from the national definition of previously developed land. A broad description of potential household types is included in the supporting text. This is considered to be sufficient to support the housing mix policy. It would be too prescriptive and meaningless to include a more detailed profile of the household types required, especially as people's housing aspirations and what they will buy may not necessarily match their actual need.

3.8.23 It is considered unnecessary to cross refer to the gypsy and traveller policy within the supporting text. A broad reference to viability assessments has been included within the supporting text to the policy, as suggested by a respondent.

| Number of Comments | Number of Consultees |
|--------------------|----------------------|
| 72 | 69 |

List of Respondents

Butler; Capital Shopping Centres; Crown Estate; Foster; Keyworth Parish Council; Manor Chiltern Ltd; Miller Homes Limited; Nottingham Action Group on HMOs; The Co-operative Group; W Westerman Ltd C/O DPDS Consulting; Wheeldon Brothers Ltd; Mr Matt Anderson-Victoria TRA; Mrs Kate Asquith; Ms. S Ball; Awworth Parish Council; Mrs Emily Benskin-Deancoast; Ms Mary Carswell-Thrumpton Parish Meeting; Mrs Carol Collins-Rushcliffe CPRE; Mr Nigel Cooke-One Nottingham; Ms Alice De La Rue-Derbyshire Gypsy Liaison Group; Mrs Shirley Dooley; Mr Mike Downes-Barratt Strategic/Westerman Homes Ltd; Mr Michael Fenton-Taylor Wimpey UK Limited; Mr Keith Fenwick-Alliance Planning; Mr Robert Galij-David Wilson Estates; Mrs Sally Gill-Service Manager Spatial Planning Nottinghamshire County Council; Ms Valerie Glew-Erewash Borough Council Development Management; Mr Ian Goldstraw-Derbyshire County Council-Forward Planning; Dr Paul Greatrix-The University of Nottingham; Sally Handley-Head of Strategic Planning and Development Nottinghamshire County Teaching Primary Care Trust; Mr Steve Harley-East Midlands Development Agency (EMDA); Ms Lynn Holland-Bingham Town Council; Mr Robert Jays-William Davis Ltd; Mr G Joseph; Mr. Chris Kemp; Chris Kemp-Keyworth Village Design Statement; Neil Oxby-Kinoulton Parish Council; Kinoulton Parish Council; Ms Lorraine Koban; Mr Peter Lane; Mrs H.W. Lawson; Mr Sidney Leleux-Risley Parish Council; Mr Jamie Lewis-Hunter Page Planning; Mr Joe Lonergan, Chairman-Ravenshead Parish Council; Mr Dan Lucas-Nottingham City Homes; Mr Peter Marson; Mr Peter McCormack-Derwent Living; Mr Tony Morkane-Derbyshire County Primary Care Trust (PCT); Mr Ged O'Donoghue-Nottingham Trent University; Ms Emma Orrock-Nottingham City Council; Ms Emma Parry; Ms Peach; Mr Nigel Perkins; Mr. J. Potter-Ruddington Parish Council; Mr and Mrs Pratt; Ms J Raven-Gotham Parish Council; Ms Chris Read-Nottingham City Council; Mrs Fay Sexton; Mr Michael Smith-GOEM Government Office East Midlands; Mr Keith Spencer-Dale Abbey Parish Council; Mr James Stevens-Home Builders Federation (HBF); Mr David Thornhill- Campaign for Better Transport; Mrs Jane Wallace; Mr Keith Wallace-CPRE Derbyshire Branch; Mr Richard Walters-Hallam Land Management Limited; Mr David Ward-Wilson Bowden Development Ltd; Mr Graham Warren-Taylor Wimpey Developments Ltd; Mr Max Whitehead-Strategic Planning Manager JS Bloor (Services Ltd); Mrs Whitt; Sam Wilkinson-UoN Students Union; Mr Bob Woollard-Andrew Martin Associates.

3.9 Gypsies, Travellers and Travelling Showpeople

3.9.1 Nottinghamshire County Council's wishes to see pitch requirements by district set out in the policy and identification of which development plan documents will allocate suitable sites. It is also requested that the specific needs of Travelling Showpeople should be included in development plan documents. The County Council also expresses the view that the sentence in the policy beginning "In countryside areas outside of the Green Belt" is not clear in that it implies an exception to policy, but establishes policy-based criteria. The point is made that exceptions to policies should not be established within policies. In addition, the point is made that the text in this sentence "meet the definition of Gypsies and Travellers" is unnecessary.

3.9.2 GOEM believes that the criteria in the policy should also apply to windfall sites as well as allocations. Additionally, it makes the point that if there is not time to allocate pitches in Site Allocations DPDs then there will need to be consideration of making required pitches a strategic allocation in the Core Strategies to ensure that they are achievable.

3.9.3 A number of respondents have requested additions to the Policy. The Nottinghamshire County PCT asks for criterion (b) of the policy to include reference to primary and community health care facilities while English Heritage believes that the word "historical" needs to be added to "natural and built environment" to ensure that all elements of the historic environment are covered.

3.9.4 Derbyshire Gypsy Liaison Group objects that the policy is too restrictive, by limiting sites to within main settlements or as part of sustainable urban extensions and the 'fall back' position of the criteria based element of the policy does not provide an acceptable solution. However, the Nottinghamshire Gypsy and Traveller Liaison Officer is supportive of the policy and the commitment to address pitch provision for Gypsies and Travellers in line with the need identified in the Nottinghamshire Gypsy and Traveller Accommodation Assessment.

3.9.5 One respondent believes that there should be no allowance for business use on site as it would be very difficult to control such uses. An error has been identified with respect to reference to listed settlements in Policy 3 as Policy 3 does not list settlements. The respondent also asks that clarification is provided over the role of Sustainable Urban Extensions in the provision of permanent gypsy and traveller accommodation and how this has been provided thus far within Greater Nottingham.

Officer Response

3.9.6 It is appropriate to include pitch requirements within the justification text but not in the policy itself, given that current identified requirements do not cover the whole plan period and, as new evidence is compiled, may well change of the plan period. That part of the policy that starts "In the countryside outside the Green Belt..." has been removed because it is potentially confusing. Furthermore, possible impacts on the countryside, whether in or outside the Green Belt, are adequately addressed elsewhere in the policy.

3.9.7 There is merit in making more explicit that the policy applies to both site allocations and to speculative/windfall proposals. It is not, however, accepted that sites should be allocated through the Core Strategy, as individual site allocations are not strategic in nature

and are more appropriately dealt with in subsequent development plan documents. For criterion 'b' of the policy, apart from primary schools, it is considered unnecessary to specifically list any other facilities. Primary schools are mentioned as an exception because ensuring their proximity to sites is of utmost importance.

3.9.8 Aside from making clear that the focus for provision is all settlements, it is not accepted that the policy is either overly restrictive or, conversely, not restrictive enough. Rather, it is considered it achieves an adequate balance between, on one hand, the needs of gypsies, travellers and showpeople and, on the other, the need to protect the countryside and achieve sustainable development. The policy has also been amended to better reflect emerging Government policy in relation identify space requirements.

| Number of Comments | Number of Consultees |
|--------------------|----------------------|
| 27 | 26 |

List of Respondents

Barratt Strategic/Westerman Homes Ltd, Mr Keith Bentley, Capital Shopping Centres, Dale Abbey Parish Council, David Wilson Estates, Derbyshire County Primary Care Trust (PCT), Derbyshire Gypsy Liaison Group, Derwent Living, English Heritage, Environment Agency, Erewash Borough Council - Development Management, Mr Jeremy Fenn, Government Office for the East Midlands, Mr G Joseph, Ms Lorraine Koban, NAVO, Natural England, Nottingham Action Group on HMOs, Nottingham City Council, Nottinghamshire County Teaching Primary Care Trust, Nottinghamshire Police, One Nottingham, Ramblers Association, Spatial Planning - Nottinghamshire County Council, Wilson Bowden Development Ltd

3.10 Design, the Historic Environment and Enhancing Local Identity

3.10.1 Overall, some respondents, including GOEM, state that the policy could be more locally distinctive and would need to be applied flexibly. The importance of a clear and explicit priority for design quality and place-making objectives in the Core Strategies which sets out the key principles was highlighted by CABE. The policy was supported by CPRE who considered that it would provide attractive communities with links to local historic and cultural background, avoiding mass produced designs. Supplementary Planning Documents were suggested as being a requirement in the implementation of the policy. It was also hoped that the “Manual for Streets” would not be applied rigidly in rural areas.

3.10.2 One developer considered that the policy delved into too much detail but was also generalised and lost meaning. Detailed bullet points were considered repetitive or vague. Reference to current best practice guidance and standards without specifying what these standards are was not helpful. Concerns were expressed over the way Building for Life standards have been applied which are a voluntary scheme.

3.10.3 It was questioned by the House Builders Federation whether the Core Strategies will require developments to meet a certain level of the Code for Sustainable Homes. This would be contrary to PPS1 as it would replicate the scope of other legislative requirements, including Building Regulations. It was viewed that Building for Life criteria are not fit for purpose for measuring design quality and recommends that the requirement for all developments of 10 or more homes to achieve a good rating should be deleted.

3.10.4 The historic environment was identified by a number of respondents as important. There was support for a separate policy on the historic environment from a number of respondents including Nottinghamshire County Council and English Heritage. Derbyshire County Council stressed the importance of relating to both historic and contemporary assets and the need for high design quality and energy efficiency relating to climate change and place making. The emphasis on high quality design, designated and non-designated heritage assets and their settings and local distinctiveness was welcomed.

3.10.5 It was noted by Nottinghamshire County Council that heritage led regeneration can enhance the quality of development and that not all heritage assets are visible. The National Trust also identified that the wider settings of heritage assets is a key consideration. The Coal Authority recommended an additional criterion, ensuring that development must have regard to its local context and impact on heritage assets in accordance with PPG14. However, one respondent noted that the objective of protecting historic buildings and townscapes may not always be compatible with the objectives of design to adapt to future climate change. The need to protect ancient farming methods and fields was seen by the Ramblers Association as important.

3.10.6 Development of housing on garden land was also the subject of a number of responses. Nottingham City Council noted that over intensive garden development may damage biodiversity. However, another respondent felt that although garden development can make an important contribution to housing supply there should be restrictions in areas of special character or where there have been urban characterisation assessments. The importance of local character especially areas of character that may not have Conservation Area status yet have a strong sense of place and are worthy of support in terms of enhancing

local identity was highlighted by Nottingham City Homes. In addition one Parish Council considered that Village Design Statements should be included in the list of supplementary planning documentation. Another Parish supported the protection and expansion of conservation areas within villages.

3.10.7 A number of issues were suggested as possible inclusions in the Policy. These included:

Natural England suggested that reference be made to the Greater Nottingham Landscape Character Assessment (2009).

The Environment Agency recommended that there should be an amendment to policy to address the matters of waste and recycling.

Nottinghamshire Police recommended that Crime Prevention Through Environmental Design should be incorporated throughout the policy.

A reference to green space and / or Green Infrastructure and its importance in design and local identity should be included.

The role of public art should be acknowledged.

The enhancement and protection of inland waterways and their settings through the inclusion of specific design criteria as suggested by British Waterways and the Inland Waterways Association

Officer Response

3.10.8 A separate policy has been included to address the historic environment and this will ensure that new development has regard to the historic character areas. A new sub-policy is added to Policy 10 addressing development within landscapes based on the application of landscape character assessments prepared as part of the evidence base. The importance of public art and open and civic spaces is acknowledged.

3.10.9 Further work such as urban characterisation studies and conservation area appraisals have been identified as methods to provide the details needed to inform planning applications and give greater recognition of the character of areas. However, the need for Supplementary Planning Documents to implement this policy is a matter best determined by each authority individually.

3.10.10 Matters relating to waste and recycling while important are too detailed for the Aligned Core Strategies and felt to be sufficiently covered by the application of best practice and appropriate standards. In relation to those standards, the Code for Sustainable Homes is a higher standard than the Building Regulations so does not replicate it. Given that the HBF is a partner of the Buildings for Life scheme it is felt that it is appropriate way to assess design quality. However, reference to specific standards are not made in the policy, to allow flexibility in which standards are appropriate to specific circumstances.

| Number of Comments | Number of Consultees |
|--------------------|----------------------|
| 57 | 50 |

List of Respondents

Mr S Baker Derbyshire County Council; Mrs E Benskin – Dean coast; Mr K Brown – Police Headquarters; Ms S Burgess – CABE; Miss R Bust – Coal Authority; Butler – Icon Business Centre; Captial Shopping Centres; Mrs C Collins CPRE; Mr N Cooke – One Nottingham; Ms A De La Rue – Derbyshire Gypsy Liaison; Mr I Dickinson – British Waterways; Mr M Downes – Barratt Strategic; Mrs S Ebbins; Mr M Fearn – Shire Consulting; Mr J Fenn; Mr M Fenton Taylor Wimpey UK; Mr K Fenwick – Alliance Planning; Foster – Icon Business Centre; Mr R Galij – David Wilson Estates; Mr T Gilbert – Wooldridge – English Heritage; Mrs S Gill – Nottinghamshire County Council; Ms V Glew – Erewash Borough Council; Mr I Goldstraw – Derbyshire County Council; Ms S Handley; Ms C Harrison – Natural England; Mr E Hopkins – Nottinghamshire County Council; Mr A Hubbard – The National Trust; Mr G Joseph; Ms A Kelly - Nottingham City Council; C Kemp - Keyworth Village Design; Dr R Keymer – Natural England; Keyworth Parish Council; Ms L Koban; Nottingham Action Group; Mr D Lucas – Nottingham City Homes; Miss E M Mackie – Elton Parish Council; Mr P McCormack – 1Derwent Living; Ms E Orrock – Nottinghamshire County Council; Mr N Oxby – Kinoulton Parish Council; Mr J Potter – Ruddington; Mr M Smith Government Office; Mr M Smith Ramblers Association; Mr J Stevens; Mr K Wallace CPRE – Derbyshire Branch; Mr D Ward – Wilson Bowden Development; Mr G Warren – Taylor Wimpey Dev; Miss N Wing – Environment Agency; W Westerman Ltd.

3.11 Local Services and Healthy Lifestyles

3.11.1 There was general support for the approach to the policy including the strategic element although the need for services to be viable in terms of numbers was raised as an issue as was the approach taken in rural areas.

3.11.2 Natural England and Sport England wished to see the policy expanded to cover matters such as the natural environment and outdoors sports provision respectively.

3.11.3 Derbyshire County PCT thought that it was important to consider the wider determinants of health beyond access to health facilities and supported the use of the 'Watch out for Health' checklist to assess the impact of planning proposals.

3.11.4 Another respondent felt the policy should address community economic development through the consideration of establishing the development of a 'social enterprise zone'.

3.11.5 As pointed out by the Home Builders Federation it will be important to follow the approach to planning conditions and obligations laid out in the regulations (Circular 11/95, Circular 05/05 and Community Infrastructure Levy regulations). One respondent highlighted that in certain cases it may be necessary to adopt a pragmatic approach to requirements for community infrastructure if the Local Authorities are looking to encourage development in certain locations.

3.11.6 A number of respondents felt that the following areas should be clarified:

The meaning of the sentence "Priority will be given to community facilities that provide the opportunity for healthy lifestyles and improve well-being throughout Greater Nottingham"

The meaning of the sentence "Where community facilities (especially health and education) serve areas covered by more than one provider, agencies should work together to ensure service integration and efficient use of resources"

Where new, extended or improved community facilities are considered necessary.

Officer Response

3.11.7 The provision of community facilities in rural areas is addressed in paragraph 3.11.2 of the justification and it is not thought that additional safeguards would be effective in protecting these facilities where they are well used and locally valued. In relation to the regulations any requirement for contributions from developers would obviously be in accordance with the law expressed in regulations at the time the decision is taken. The location of new facilities required will be explored in detail for strategic sites through the Core Strategies and for other sites through other development plan documents.

3.11.8 Use of the 'Watch out for Health' Checklist was not thought to be necessary as many of the criteria are reflected in the Sustainability Appraisal carried out for the Aligned Core Strategy. It was also felt unnecessary to include optometrists and pharmacies in the list of community facilities in paragraph 3.11.18 as the list is not meant to be exhaustive.

3.11.9 In relation to the inclusion of matters such as the natural environment, outdoors sports provision and social enterprise zones these are best dealt with in other policies. The Aligned Core Strategies are designed to be used as a whole and while there are clear links between many of the policies which are identified where necessary our approach has been to reduce the number of duplicated references to a minimum.

| Number of Comments | Number of Consultees |
|--------------------|----------------------|
| 46 | 39 |

List of Respondents

Mr Steve Beard Sport England; Ms Helen Berry; Mr Nigel Cooke; Ms Alice De La Rue Derbyshire Gypsy Liaison Group; Mr Mike Downes; Barratt Strategic/Westerman Homes Ltd; Ms Christina Dyer Nottingham City Council; Mr Robert Galij David Wilson Estates; Mrs Sally Gill NCC; Ms Valerie Glew Erewash Borough Council; Mr Ian Goldstraw DCC; Mr Paul Green; Sally Handley Nottinghamshire County Teaching Primary Care Trust; Ms Caroline Harrison; Natural England Mr G Joseph; Ms Adrienne Kelly Nottingham City Council; Dr Rick Keymer Natural England; Neil Oxby Kinoulton Parish Council; Ms Lorraine Koban; Mr Joe Lonergan Ravenshead Parish Council; Mr Dan Lucas Nottingham City Homes; Mr Ian Machan; Mr Peter McCormack Derwent Living; Mrs Christina Morgan; Mr Tony Morkane Derbyshire County Primary Care Trust (PCT); Ms Emma Orrock Nottingham City Council; Ms. Peach ; Mr. J. Potter Ruddington Parish Council; Mr Michael Smith Government Office for the East Midlands; Mr Keith Spencer Dale Abbey Parish Council; Mr James Stevens House Builders Federation (HBF); Mr David Ward Wilson Bowden Development Ltd; Mr Bob Woollard Andrew Martin Associates; Nottingham Action Group on HMOs; Capital Shopping Centres; The Co-operative Group; Crown Estate; Confederation Of Passenger Transport UK; Sport England (SE); Sam Stafford Savilles.

3.12 Culture, Sport and Tourism

3.12.1 The approach taken to sporting facilities means they are covered in a number of places in the plan, including under this policy and in relation to community facilities. Respondents felt that there should be greater clarity regarding developer contributions and whether new sporting facilities are required and include reference to culture, sport and tourism factors in new developments. The past cultural significance of those sites should be recognised when dealing with sites such as Stanton. References to Nottingham being a world class sporting city are supported although some respondents felt this could be expanded to cover Nottinghamshire County and refer to joint funding to support sports delivery.

3.12.2 The proposals for new major sports venues to be located in the 'south east of the Principal Urban Area' resulted in a number of comments including that the policy should be specific over location and include greater clarity over the meaning over the area identified. There was concern that this may result in a Green Belt location which would require robust justification. While a number of respondents supported the proposals for a FIFA compliant football stadium as this would reinforce the unique cluster of elite sporting facilities others felt there was no justification for this in an unsustainable location such as Gamston and that new venues should be located away from areas that have plenty of them. Where new major sporting venues are provided a number of respondents felt that the following were important associated developments:

Quality public houses in close proximity

Integrated public transport including appropriate level and type of parking facilities

3.12.3 The need for community facilities was also highlighted as an issue which needed greater references in the policy. Opportunities for the development of social enterprises and community businesses to grow should be explored alongside the joint or shared planning around the planning of parks, leisure and health facilities.

3.12.4 Other issues raised by respondents included:

The protection of existing facilities, especially theatres, unless it is demonstrated that the facility is no longer needed or a replacement provided.

The creation of trails between different areas and buildings connected with historic events or figures such as DH Lawrence or Robin Hood

Reference should be made to the Nottingham Physical Activity and Sports Strategy, Breathing Space and the PPG17 and Playing Pitch Audits.

Officer Response

3.12.5 The Policy now includes clarification that the reference to "in the Principal Urban Area" does not imply a Green Belt location, and that there are currently no major proposals planned, so the policy is principally intended to cover future eventualities.

| Number of Comments | Number of Consultees |
|--------------------|----------------------|
| 52 | 38 |

List of Respondents

Andrew Martin Associates, Barratt Strategic/Westerman homes Ltd, British Waterways, Campaign for Better Transport, Capital Shopping Centres, Confederation Of Passenger transport UK, Dale Abbey Parish Council, David Wilson Estates, Derbyshire Gypsy Liaison Group, Derwent Living, Erewash Borough Council, Gotham Parish Council, Government Office for the East Midlands, GVA Grimley for Oxylane, Holme Pierrepont and Gamston Parish Council, Holmes Antill, Mr & Mrs G.C. Jackson, Mr David Alexander, Mr G Joseph, Mr Jeremy Fenn, Mr Martin Smith, Mr Melvyn Tisbury, Mr Neil Trickey, Mr Paul Green, Ms Emma Parry, Ms Lorraine Koban, Nottingham Action Group, Nottingham City Council, Nottinghamshire County Council, Nottinghamshire County Teaching Primary Care Trust, One Nottingham, Ramblers Association, Ruddington Parish Council, Rushcliffe CPRE, Sport England, The Theatres Trust, The University of Nottingham, Wilson Bowden Development Ltd

3.13 Managing Travel Demand

3.13.1 The encouragement of area wide travel demand management which aims to reduce travel by private car and incentivise public transport, walking and cycling is broadly supported among the consultation responses. The identified hierarchy is also generally supported.

Public Transport

3.13.2 The development of the NET was supported by Nottingham City Homes as it will help to allow low income households to access employment and services. The quality of public transport has been improved by areas served by the NET and this will be replicated in areas served in the future. However other respondents raised concerns that development of the NET would be to the detriment of small local bus routes and that the NET is not a flexible option as communities grow.

3.13.3 To encourage the use of public transport investment needs to be made to make the services more attractive, particularly main interchanges. Investment in rail and bus priority schemes were identified as potential options.

3.13.4 Many landowners and stakeholders support the policy for creating accessible development through supporting public transport and road building and feel that the most accessible locations should come forward first.

3.13.5 Parking policies are generally believed to be effective to ease conditions for public transport operation and protect the viability of town centres (the recent changes in PPG13 may however be an issue).

Infrastructure

3.13.6 House builders generally agree that the need to place new development in locations accessible to sustainable modes should be highlighted in the policy but particularly in locations which reduce the need to travel. House builders also felt that extending the original NET system to serve new areas in the Green Belt would be more effective than expanding the network to serve development in brownfield sites.

3.13.7 Rushcliffe CPRE proposed that sustainable transport systems and investment should be in place before a site is developed and criticise the reference to sites which have the 'potential' to be well-served by transport links as this could be used to justify development at any site.

3.13.8 Respondents also felt that the following should be clarified or given greater emphasis:

The need to improve regional principal networks to accommodate further growth

Greater reference to freight distribution

Targeting congestions bottlenecks for road building investment

Modal Shift/ Behavioural Change

3.13.9 There was general support for the proposals to move away from reliance on private motor vehicles although reducing the need to travel and the stress on the strategic road network could be emphasised more clearly. However, the need for incentives to create behavioural change and safety measures for pedestrians and cyclists were both raised as issues. Sites where the delivery of a modal shift away from the car should be prioritised.

3.13.10 Respondents felt that more could be made of the benefits of modal shifts such as healthy lifestyles and reducing CO₂ emissions. Rushcliffe CPRE also felt that more could be made of the economic benefits by comparing the cost of 'smarter choices' when compared to road building. British Waterways suggest that this policy should take into account that the cost of regenerating brown field sites is higher than green field sites.

3.13.11 The situation in rural areas was highlighted as which needed to be addressed more specifically in the policy. Both Keyworth and Dale Abbey Parish Councils highlighted that alternatives to the car are not always possible in rural areas due to the lack of public transport and the remoteness of settlements.

3.13.12 Important destinations which should be specifically addressed or focussed on include business and employment provision, including business parks and retail and leisure developments, especially links to the city centre and district centres.

General comments

3.13.13 Nottinghamshire County Council states that travel plans need to be enforceable so reference to securing them through conditions or planning obligations should be made in the policy. Reference to 'Green Travel Plans' should be removed from the policy and reference made just to 'Travel Plans'. Derbyshire County Council points out that the policy dates PPG13 as published in 2005, it was however published in March 2001.

3.13.14 Many home owners do not want houses built near to their neighbourhood as it will cause further strain and congestion on the already over utilised transport systems. However, the Home Builders Federation does not agree that new developments will make considerable new demands on transport infrastructure as suggested in the policy. One house builder points out that this policy should be cross referenced with Policy 3 (point 7 in particular).

3.13.15 The Campaign for Better Transport point out that number 4 in the hierarchy is in contrast to the objectives of the rest of the document – there should be no enhancements to deal with residual car demand.

3.13.16 GOEM points out that the policy is generic and says little more than national policy and should be more locally distinctive. Both GOEM and Rushcliffe CPRE suggest that the 3 Cities DaSTS study (especially the priorities) should be used to help co-ordinate the policy.

3.13.17 The Highways Agency believes its recently commissioned VISSIM model of the A52 corridor should be used to form the evidence base.

3.13.18 Rushcliffe CPRE and British Waterways suggest that parking policies should be co-ordinated across the conurbation to achieve consistency so competition between sites is not judged on this basis.

Officer Response

3.13.19 Overall, the comments show a good degree of support for the emphasis given to sustainable transport. Although issues have been raised in terms of the effectiveness of the policy in reducing the need to travel, in promoting a clear sustainable transport hierarchy and in ensuring that where necessary public transport schemes are provided early in the build period of new development to ensure that they are fully used. Issues have also been raised with regard to whether the policy is locally distinctive and questions over whether travel plans are enforceable. The safety issue for cyclists and pedestrians has also been raised as one that requires further thought.

3.13.20 The majority of the comments raised have been addressed in terms of amending the policy to make clearer the locally distinctive aspects of prioritising travel demand management at the top of the hierarchy due to specific capacity issues within the city centre with regard to kerb space for new services. The safety issues for cyclists and pedestrians have been given greater priority in the policy and extra emphasis can be given to steer new development into the locations already best served by sustainable transport choices. The hierarchy of the policy has been clarified to ensure that all sustainable transport solutions are fully investigated before road based solutions are used.

3.13.21 It is the case that there will be circumstances where sustainable transport choices are not available for new development in rural areas and this is an issue that can be addressed in subsequent DPDs, in line with the principles of sustainable transport policy. The issue of sustainable freight has been considered in Policy 4 (Employment Provision and Economic Development) while the alignment of parking policies will be addressed in Development Plan Documents.

| Number of Comments | Number of Consultees |
|--------------------|----------------------|
| 74 | 46 |

List of Respondents

Andrew Martin Associates, Awwsworth Parish Council, British Waterways, Confederation Of Passenger Transport UK, CPRE Derbyshire Branch Derbyshire and Peak District Transport, Derbyshire Wildlife Trust, East Midlands Development Agency (EMDA), Erewash, Borough Council - Development Management, GOEM (Government Office for the East Midlands), Home Builders Federation (HBF), Junction 26 Investments Ltd C/o GVA Grimley, Keyworth Parish Council, Leicestershire County Council - Planning Policy, Miller Homes Limited, Miss Sarah McCartney, Mr and Mrs Brian Spencer, Mr Colin Allen, Mr David Thornhill, Mr Jeremy Fenn, Mr Keith Wallace, Mr Martin Smith, Mr Paul Green, Mr Peter McCormack, Mr Chris Kemp, Mrs Emily Benskin, Nottinghamshire County Council, Ms Emma Orrock, Ms Emma Parry, Ms Mary Carswell, Ms Valerie Glew (Erewash BC), Ms Peach, Natural England,

Nottingham City Homes, Nottinghamshire Police, One Nottingham, Radcliffe-on-Trent Golf Club, Risleigh Parish Council, Ruddington Parish Council, Sally Handley, Sandiacre Parish Council, Taylor Wimpey Developments Ltd, The Coal Authority, The Co-operative Group, Tillbridge Developments LLP, Highways Agency, Wheeldon Brothers Ltd

3.14 Transport Infrastructure Priorities

3.14.1 Overall, consultees objected to the policy as they did not believe that it was in line with the rest of the document and in particular conflicted with Policy 13.

Public Transport

3.14.2 One consultee suggested the inclusion in the policy of reference to bus priority schemes and the emphasis on enabling the NET network as this will enable people in deprived areas to access employment and services.

3.14.3 Other potential schemes suggested that could be included in the policy include the creation of a more frequent rail service and also fast and convenient access to and from airports improving casual and business links to Greater Nottingham. Nottinghamshire County Council also state that the A453 Widening should indicate the route from M1 to A52(T)Clifton to describe it more accurately.

3.14.4 A major refurbishment of Nottingham Midland Station will be required to attract HS2 to Greater Nottingham. However some respondents felt that this should not be put above extracting benefits from the existing transport system. The description of the proposals for 'Nottingham Midland Station Hub' could include capacity improvements to more accurately describe what is included.

3.14.5 Rushcliffe CPRE state that the 'Alternative Options' do not state why options giving a higher priority to public transport, walking and cycling were not considered and believe that this fails to comply with the LDF process.

Modal Shift/Behavioural Change

3.14.6 Many, including GOEM, criticise the policy for not including walking and cycling in the list for major transport improvements. It is suggested that 'Site specific smarter choice measures' could be included in the third list and this undermines the sequential list in policy 13.

Infrastructure

3.14.7 The funding for infrastructure proposals was raised by a number of respondents. Very few of the schemes have secured funding and are in varying stages of preparation with different degrees of certainty attached to them. There was consensus amongst the House Builders Federation, GOEM, and Nottinghamshire County Council that uncertainty over funding should be acknowledged and a contingency plan should be prepared to address the 'what if?' situation.

3.14.8 Many house builders suggest that the policy should make the source of funding clear, i.e. whether it is publicly funded or developer contributions via CIL or S106. Relying on one source of funding should be avoided and funding is likely to be scarce in the coming years. They also suggest greater flexibility and further contingency because of doubts about the delivery of the SUEs, and therefore they want more emphasis on settlement amendments and a more dispersed strategy.

3.14.9 The Highways Agency state that the forthcoming 'infrastructure capacity study' and 'Delivery Plan' mentioned in policy 18 should outline the timescales within which transport infrastructure will be delivered and be linked to this policy. Another respondent believes that the policy should refer to the need for further transport modelling.

3.14.10 A number of objections to the content of the policy were received. One respondent believes that highway improvements will encourage use of the private car which is not environmentally friendly while another states that the use of Green Belt for road building goes against sustainable principles set out by national government. Natural England state that an assessment of green corridors and the natural environment should be made and preserved as much as possible.

3.14.11 Apart from the mention of the A453 proposal the policy does not address road access to Greater Nottingham which is becoming more isolated from the rest of the country meaning that the business community may chose other locations.

General Comments

3.14.12 The approach taken to the Local Transport Plan has been criticised by GOEM as it appears to elevate it to the status of a DPD. They also considered Core Strategies need to be coordinated with the LTP despite the differing timescales.

3.14.13 GOEM suggests that the policy is vague and not locally distinctive. As drafted it could be viewed as not a policy but a list of potential schemes and the Campaign for Better Transport propose that the policy should be deleted on this basis. Other respondents also believes that the policy conflicts with the DaSTS rationale and does not serve to highlight the importance of transport which is important to justify housing numbers within the whole document.

3.14.14 Additionally there should be cross references to other policies especially policies 2 and 3 while partnership building was seen as an important way for Government to ensure infrastructure improvements. The statement that new development should not threaten the 'integrity of the transport system as a whole' is unclear and should be clarified.

3.14.15 The policy states that existing planned public transport and highway improvements included in the LTP and/or Regional Funding Allocations programmes are relatively certain however this is misleading due to the uncertainty in future funding levels. There should also be greater clarity over the status of schemes identified in the 'other schemes' list and there should be a clear statement as to whether these will be promoted.

3.14.16 Respondents also identified that the policy should:

Address commercial freight on the River Trent.

Seek to minimise crime, disorder and anti-social behaviour in new transport systems.

Deliver improvements to the heavy rail infrastructure.

Officer Response

3.14.17 The points regarding the need for the policy to properly reflect the sustainable transport priorities in Policy 13 with a clear priority of funding and timing for schemes are entirely valid, and these points have been addressed when taking the Aligned Core Strategies forward to submission.

3.14.18 This has been done through closer links to funding priorities as expressed in the Infrastructure Delivery Plan in the context of vastly reduced central government investment in transport schemes. Flexibility has also been built into the Aligned Core Strategies to deal with the failure of any identified infrastructure scheme.

| Number of Comments | Number of Consultees |
|--------------------|----------------------|
| 70 | 52 |

List of Respondents

Andrew Martin Associates, Butler, Confederation Of Passenger Transport UK, CPRE Derbyshire Branch, Derbyshire and Peak District Transport, Derbyshire Gypsy Liaison Group, Derbyshire Wildlife Trust, East Midlands Development Agency (EMDA), English Heritage, Environment Agency, Erewash Borough Council - Development Management, Foster, GOEM (Government Office for the East Midlands), Home Builders Federation (HBF), Inland Waterways Association, Leicestershire County Council - Planning Policy, Miller Homes Limited, Mr and Mrs Pratt, Mr Asif Mohammed, Mr Charles Etchells, Mr Gary Trickett, Mr Graham Ewing, Mr Graham Kirby, Mr Jeremy Fenn, Mr Mike Downes, Mr Nigel Perkins, Mr Paul Green, Mr Peter McCormack, Mr Stuart Allen, Mrs Penny Newton, Mrs Shirley Dooley, Ms Alice De La Rue, Ms Emma Orrock, Ms Emma Parry, Ms J Raven, Ms Karina Wells, Ms Patricia Dines, Ms Peach, Natural England, Nottingham City Homes, One Nottingham, Radcliffe-on-Trent Golf Club, Risley Parish Council, Ruddington Parish Council, Sally Handley, Spatial Planning Nottinghamshire County Council, The Co-operative Group, Turley Associates, Victoria TRA, Wheeldon Brothers Ltd

3.15 Green Infrastructure, Parks and Open Space

3.15.1 While there was general support for the principles set out in this Policy a number of respondents including Natural England, Sports England and Nottinghamshire County Council felt that the policy could be strengthened. This would include the following:

- specifically mentioning formal space for sport;
- including reference to Greenwood Community Forest;
- addressing heritage and the historic landscape; and
- adopting a more positive sequential approach.

3.15.2 Adopting a more positive sequential approach would ensure that the reasons for underuse or undervalued assets were addressed before its release for development was permitted. The protection of the Green Belt was seen as important by members of the public.

3.15.3 The use of the terms 'primary and secondary' in 15(3) was opposed by many including Natural England and Nottinghamshire Wildlife Trust as it could be seen to only require two functions and indicates that one is more important than another. There was also opposition to the provisions of 15(2b) which allows the need for and benefit of a development to be weighed against the harm it may cause to a Green Infrastructure corridor or asset. It was also recommended that the following change be made to the list of functions in 15(3):

- Add 'enhancement of landscape character';
- Add 'opportunities for environmental public art; and
- Amend e) to read 'climate change adaptation'.

3.15.4 The issue of access was raised by a number of respondents. Not all Green Infrastructure is equally as accessible due to the sensitive nature of certain sites especially those with biodiversity or scientific value as these could be damaged by the presence of large numbers of visitors. The map of Green Infrastructure corridors shown in the justification to the Policy was seen by a number of respondents including GOEM to be unclear and strategic corridors should be shown on the Key Diagram. It was also highlighted that the term 'major development' should be defined more clearly.

Officer Response

3.15.5 Amendments have been made to the list of Green Infrastructure uses to include sports provision, enhancement of landscape character and heritage. It was felt that to change 15(3e) to refer only to adaptation only would unduly restrict the application of the policy. Reference is made to Greenwood Community Forest in 15(2a) and paragraph 3.15.2. It was decided not to include 'environmental public art' in the list of Green Infrastructure uses as this is not a strategic issue. The list is not intended to be exhaustive and does not preclude the provision of environmental public art in appropriate locations.

3.15.6 Reference to 'primary and secondary' uses has been replaced with the requirement that Green Infrastructure corridors and assets should look to make provision for more than one of the uses identified in the updated list in 15(3). The sensitivity of certain Green Infrastructure assets to public access is discussed in the justification while those assets with the highest level of protection are also addressed by Policy 16 (Biodiversity) or the policy

dealing with the Historic Environment. The Green Infrastructure map has been updated to include strategic Green Infrastructure corridors and the key diagram has been amended to include the strategic Green Infrastructure corridors.

3.15.7 The provisions of paragraph 15(2b) that the benefits of a development proposal will be considered is an established principle of the planning system and its removal from Policy 15 will not alter this. However, the policy has been amended to clarify that alternative scheme designs should be considered first. Provision has also been made to ensure that steps are taken to explore the potential for underused or undervalued assets to be brought back into full use prior to alternative uses being permitted.

| Number of Comments | Number of Consultees |
|--------------------|----------------------|
| 110 | 63 |

List of Respondents

Ms Pat Ancliffe; Ms. S Ball Awworth Parish Council; Ms Liz Bank Holmes Antill; Mr Steve Beard Sport England; Ms Mary Carswell Thrumpton Parish; Mrs Carol Collins Rushcliffe CPRE; Ms Alice De La Rue Derbyshire Gypsy Liaison Group; Mr Ian Dickinson British Waterways; Ms Patricia Dines; Mr Mike Downes Barratt Strategic/Westerman Homes Ltd; Mr Gordon Dyne Rushcliffe Nature Conservation Strategy Implementation Group; Mrs Susan Ebbins; Mr Jeremy Fenn; Mr Robert Galij David Wilson Estates; Mr Tom Gilbert-Wooldridge English Heritage; Mrs Sally Gill NCC; Ms Valerie Glew Erewash Borough Council; Mr Ian Goldstraw Derbyshire County Council; Sally Handley Nottinghamshire County Teaching Primary Care Trust; Mr Steve Harley East Midlands Development Agency; Jonathan Harper The Co-operative Group; Ms Caroline Harrison Natural England; Ms Karen Hodgson; Mr Edmund Hopkins Nottingham City Council; Mr Alan Hubbard The National Trust; Mrs Gaynor Jones Jenkins Notts Wildlife Trust; Mr G Joseph; Ms Adrienne Kelly Nottingham City Council; Chris Kemp Keyworth Village Design Statement; Dr Rick Keymer Natural England; Neil Oxby Kinoulton Parish Council; Ms Lorraine Koban; Mrs A Lane British Horse Society; Mr Nick Law Derbyshire Wildlife Trust; Mr Dan Lucas Nottingham City Homes; Miss E M Mackie Elton Parish Council; Mr Peter McCormack Derwent Living; Mrs Christina Morgan; Mrs Penny Newton; Ms Emma Orrock Nottingham City Council; Ms Emma Parry; Mr. J. Potter Ruddington Parish Council; Mr Nick Sandford The Woodland Trust; Mr Martin Smith Ramblers Association; Mr Michael Smith Government Office for the East Midlands; Mr. Michael Snaith Inland Waterways Association; Mr Keith Spencer Dale Abbey Parish Council; Mr James Stevens House Builders Federation; Mr Paul Tame National Farmers Union - East Midlands; Mr Gary Trickett; Mr Malcolm Varley; Mr Keith Wallace CPRE Derbyshire Branch; Mr David Ward Wilson Bowden Development Ltd; Mr Robert Westerman W Westerman Ltd; Miss Naomi Wing Environment Agency; Mr Bob Woollard Andrew Martin Associates; Mrs R M Yousouf; Nottingham Action Group on HMOs; Capital Shopping Centres; Keyworth Parish Council; Crown Estate; Sport England (SE); W Westerman Ltd C/O DPDS Consulting.

3.16 Biodiversity

3.16.1 The aim of protecting and enhancing biodiversity was generally supported by respondents. As noted by Nottingham City Homes improved biodiversity and landscape features contribute to a better quality of life and sustainable communities. The relative weight to be given to biodiversity compared to other issues was identified by the Environment Agency as an issue to be clarified. Other respondents felt that greater weight should be given to biodiversity in development decisions in order to reduce the high rates of habitat loss identified in the East Midlands. Development which safeguards and boosts biodiversity should be supported if compliant with other policies.

3.16.2 Both GOEM and Alliance Planning felt that the policy added little to and repeated much of PPS9. There was a need for local detail on the type and location of sites needing protection. Details would be needed on mechanisms to achieve this. The creation of new biodiversity features in new development should be promoted but not be a requirement and it should be made clear that habitat creation carries more weight than the enhancement of existing biodiversity. The balance between biodiversity protection and policies addressing housing need requires clarification. PPS9 does not require the need for new development to be demonstrated in non-designated wildlife sites or links. A house builder stressed that biodiversity improvements in new development should be in the context of national guidance e.g. on planning obligations and that linkages to policies 2,3 and 15 should be made clear.

3.16.3 Nottinghamshire Wildlife Trust believed the policy justification did not convey the purpose of Biodiversity Action Plans in identifying rapidly declining priority habitats and species. Increased biodiversity in new development was essential in meeting Biodiversity Action Plan targets. Reference to the Broxtowe and Rushcliffe Nature Conservation Strategies was required. Some respondents noted the likely loss of biodiversity at Stanton Ironworks (Erewash) and Toton Sidings (Broxtowe).

3.16.4 The approach to mitigation and the need for a sequential approach was raised by a number of respondents. Rushcliffe CPRE, Natural England and the Environment Agency recommended that mitigation and compensation measures should only be used where there is unavoidable harm, no alternatives are available and the sequential approach has been applied. Alternative scheme designs should be looked at before considering mitigation and compensation which will require criteria to allow assessment of the required levels. The policy needed more detail on how unavoidable harm would be assessed, what new biodiversity features should be required and at what stage of the planning process will non-designated sites be identified.

3.16.5 However, others including The Woodland Trust and Nottinghamshire Wildlife Trust felt that allowing unavoidable harm and loss from necessary development went against the aims of the policy to increase biodiversity and that all designated sites should be protected including ancient wood land and ancient trees. However, Nottinghamshire County Council felt that the level of protection should be on the basis of the sites international, national or local designation.

3.16.6 Mitigation should ensure that there is no net loss of biodiversity but that replacement is not sufficient compensation as the new features will rarely have the same biodiversity value of the original natural habitat. Support was also expressed for mitigation over compensation

by Nottinghamshire County Council. Some respondents felt that mitigation was an easy option for justifying development and that wildlife corridors and habitat-rich green spaces need to be provided for the mitigation policy to be effective.

3.16.7 A number of respondents proposed additions to the policy. These included:

The use of green roofs in new developments

The use of hedgerows rather than fences

Halting the trend to concrete over front gardens

References to biodiversity being increased by habitat restoration.

The inclusion of waterways as important for biodiversity and reference could be made in a similar way to Policy 15 Green Infrastructure.

Greater protection for urban gardens which we seen by some respondents including Nottingham City Council and Derbyshire Wildlife Trust as a key feature for biodiversity

References to Nottingham City Council's PPG17 Audit, Breathing Spaces and Ambitious for Wildlife documents

Links to climate change and health priorities

Sections could be added on both the value of wildlife corridors in species dispersal in response to climate change impacts, and also the need for the appropriate management of retained and created habitats.

Officer Response

3.16.8 A number of changes have been made to this policy to reflect the comments received. Key changes include the adoption of a clearer sequential approach, reference to management and maintenance and the inclusion of local examples of biodiversity. Urban gardens have been addressed by a paragraph dealing with non-designated sites.

3.16.9 In relation to the weight to be given to biodiversity this is a decision to be taken on a case by case basis considering the status of the site and need for development as identified in the policy. It has been clarified that the potential for mitigation is not a consideration when looking at development proposals. Links to other policies including climate change have been included in the justification.

| Number of Comments | Number of Consultees |
|--------------------|----------------------|
| 67 | 50 |

List of Respondents

Ms Pat Ancliffe; Mr Keith Bentley; Mrs Marion Bryce; Capital Shopping Centres;.Mrs Carol Collins Rushcliffe CPRE; Ms Alice De La Rue Derbyshire Gypsy Liaison Group; Mr Ian Dickinson British Waterways; Mrs Shirley Dooley; Mr Mike Downes Barratt Strategic/Westerman Homes Ltd; Mrs Susan Ebbins; Mr Jeremy Fenn; Mr Keith Fenwick Alliance Planning; Mr Robert Galij David Wilson Estates; Mrs Sally Gill Nottinghamshire County Council; Ms Valerie Glew Erewash Borough Council; Sally Handley Nottinghamshire County Teaching Primary Care Trust; Mr Jonathan Harper The Co-operative Group; Ms Caroline Harrison Natural England; Ms Caroline Harrison Natural England; Ms Karen Hodgson; Mr Edmund Hopkins Nottingham City Council; Dr Richard Hyde; Mrs Gaynor Jones Jenkins Notts Wildlife Trust; Mr G Joseph; Ms Adrienne Kelly Nottingham City Council, Dr Rick Keymer Natural England; Keyworth Parish Council Ms Lorraine Koban; Mr Nick Law Derbyshire Wildlife Trust; Mr Sidney Leleux Risley Parish Council; Mr Dan Lucas Nottingham City Homes; Miss E M Mackie Elton Parish Council; Mr Peter McCormack Derwent Living; Mrs Christina Morgan; Ms Emma Orrock Nottingham City Council; Ms Emma Parry; Ms Peach; Nottingham Action Group on HMOs Mr J. Potter Ruddington Parish Council; Ms J Raven Gotham Parish Council; Ms Chris Read Nottingham City Council; Mr Nick Sandford The Woodland Trust; Mrs Fay Sexton; Mr Martin Smith Ramblers Association; Mr Michael Smith Government Office for the East Midlands; Mr Keith Spencer Dale Abbey Parish Council; Mr Paul Tame National Farmers Union - East Midlands; Mr Gary Trickett; Mr Keith Wallace CPRE Derbyshire Branch; Mr David Ward Wilson Bowden Development Ltd; Miss Naomi Wing Environment Agency.

3.17 Landscape Character

3.17.1 Natural England would like to see Policy 17 expanded to include the retention, protection and enhancement of the landscape. Policy wording should establish the principle of landscape character led consideration of development proposals, emphasise the need for landscape and visual assessment as part of planning applications, and require development to take forward the positive enhancement of landscapes, particularly where landscape character has been degraded. Nottingham City Homes would like to see the retention of existing landscape features where development is in greenfield areas.

3.17.2 CPRE Derbyshire, English Heritage, The National Trust and Nottinghamshire County Council considered the policy is weak and should be reworded. Landscape character needs to be respected and reinforced when development takes place. Strong policy is needed to ensure that landscape character is not further eroded and is restored and enhanced. Nottinghamshire County Council stated that in all cases development proposals should demonstrate how they have approached landscape character, not just “where appropriate”. The National Trust noted that the words “where appropriate” should be omitted. Nottinghamshire County Council suggested alternative wording to amend the whole of Policy 17. Several respondents suggested alternative texts to amend parts of Policy 17. One respondent stated the policy should be reworded to spell out what protection will be given to Areas of Mature Landscape.

3.17.3 Government Office for the East Midlands asked whether the policy was necessary as it appears to reflect the national policy and if so the ‘what, where, when, how and who’ questions need to be addressed to make the policy locally distinctive.

3.17.4 Tillbridge Developments LLP referred to paragraph 2.3.11 (chapter 2) which highlighted that landscape character is now a key influence on new development. Clarification was considered necessary on this issue regarding the weight to be attached to landscape character in the Core Strategy.

3.17.5 One respondent stated that planning decisions should not be informed by one source. There are other publications on landscape types and geological character in particular areas. Another respondent noted that other characteristics such as canals, natural areas, historical sites and rights of way need to be added to the list in paragraph 3.17.2.

3.17.6 It was also raised by one respondent that Rushcliffe Nature Conservation Strategy (2010) and Historic Landscape Characterisation (HLC) studies should be included in the list under ‘3.17.7 Local Policies, Strategies and Evidence’.

3.17.7 One respondent noted that planning should take into account the visual impact and the masking of views from the distance of ridgelines. It was viewed that the policy did not provide clarity over the role and impact of ridgelines in and around Arnold.

3.17.8 One Parish Council considered that there was no evidence that Landscape Character Assessments had been used in the decisions on development sites. References have been made to the historic landscape of Clifton Pasture and Barton Moor which are in danger of destruction as they are threatened by a proposed Sustainable Urban Extension site.

3.17.9 David Wilson Estates endorsed the policy but considered the approach needed to be cross referenced with policies 2 (The Spatial Strategy), 3 (The Sustainable Urban Extensions), 15 (Green Infrastructure, Parks and Open Space) and 16 (Biodiversity).

3.17.10 Nottingham City Homes noted bringing older building and empty buildings back into use should be encouraged. The policy should assist and support this.

3.17.11 It was raised by a Parish Council that garden space is not mentioned in the policy.

Officer Response

3.17.12 This policy has been removed and its constituent elements included in other policies namely Policy 10 (Design and Local Identity, Policy 15 (Green Infrastructure) and the new policy on the historic environment. However, in disaggregating the policy a number of the issues raised in the consultation have been addressed.

3.17.13 Changes have been made to Policy 15 (Green Infrastructure) to ensure that landscape character is conserved, enhanced or restored in line with the recommendations in the various landscape character assessments covering the area. The policy also allows for the identification of locally valued landscapes which are worthy of additional protection. Policy 10 (Design and Local Identity) addresses how new development should be considered when locating within landscapes while landscapes features with a historic value are considered through the policy on the historic environment.

| Number of Comments | Number of Consultees |
|--------------------|----------------------|
| 53 | 44 |

List of Respondents

Ms Mary Carswell Thrumpton Parish Meeting; Mrs Carol Collins Rushcliffe CPRE; Ms Alice De La Rue Derbyshire Gypsy Liaison Group; Mr Ian Dickinson British Waterways; Ms Patricia Dines; Mr Mike Downes Barratt Strategic/Westerman Homes Ltd; Mr Gordon Dyne Rushcliffe Nature Conservation Strategy Implementation Group; Mrs Susan Ebbins; Mr N Foster (Mr D Frudd); Mr Robert Galij David Wilson Estates; Mr Tom Gilbert-Wooldridge English Heritage; Mrs Sally Gill Nottinghamshire County Council; Ms Valerie Glew Erewash Borough Council; Mr Ian Goldstraw Derbyshire County Council; Sally Handley Nottinghamshire County Teaching Primary Care Trust; Ms Caroline Harrison Natural England; Mr Alan Hubbard The National Trust; Mr G Joseph; Mr Paul Kaczmarczuk Barton in Fabis Parish Council; Ms Adrienne Kelly Nottingham City Council; Mr Allan Kerr; Dr Rick Keymer Natural England; Ms Lorraine Koban; Mr Nick Law Derbyshire Wildlife Trust; Mr Dan Lucas Nottingham City Homes; Miss E M Mackie Elton Parish Council; Mr Peter McCormack Derwent Living; Mrs Christina Morgan; Ms Emma Orrock Nottingham City Council; Mr. J. Potter Ruddington Parish Council; Ms J Raven Gotham Parish Council; Ms Chris Read Nottingham City Council; Mr Martin Smith Ramblers Association; Mr Michael Smith Government Office for the East Midlands; Mr Keith Spencer Dale Abbey Parish Council; Mr Gary Trickett; Mr Stephen Walker; Mr Keith Wallace

CPRE Derbyshire Branch; Mr David Ward Wilson Bowden Development Ltd; Mr Peter Winstanley; Nottingham Action Group on HMOs; Capital Shopping Centres; Tillbridge Developments LLP; W Westerman Ltd C/O DPDS Consulting.

3.18 Infrastructure

3.18.1 Most respondents identify that necessary new infrastructure is needed to support new growth. There are a number of comments that the policy lacks any detail as to where new infrastructure will be required and how it will be provided. GOEM were clear that for earlier years details have to be more specific, with the level of detail lessening the further ahead the plan is looking. A number of respondents make the point that an absence of detail, as to how infrastructure necessary to deliver much of the Plan's identified growth, raises doubts over the delivery of large urban extensions. It is suggested that there needs to be greater flexibility and further contingency in relation to growth, with an emphasis on the ability of other settlements to accommodate growth taking account of existing infrastructure. One respondent makes the point that more certainty is required over whether required infrastructure can be delivered before it is assumed that major new development proposals can be delivered (e.g. confirmation of funding for the A453 and the release of land south of Clifton for development).

3.18.2 Alliance Planning highlights that the Infrastructure Delivery Plan is important to quantify the priorities for infrastructure, and where funding will arise from. They suggest given its importance it should come through a Development Plan Document route in order to be subject to independent scrutiny. GOEM also highlight the importance of a viability assessment to ensure infrastructure is delivered.

3.18.3 Nottinghamshire County Council identifies that timely delivery of new infrastructure is critical. This will involve delivery partner authorities working together, including in the preparation of the Infrastructure Delivery Plan, and the appropriate mechanisms to collect monies from developers. Specifically, the County Council suggests, in part 3 of the policy, that "councils" be changed to "planning and transport authorities" to ensure that transport requirements are adequately addressed. It is also asked that there is clarification in paragraph 3.18.2 to ensure that there is no suggestion that the County will pick up any shortfall on transport infrastructure schemes.

3.18.4 Ashfield District Council makes the point that, in relation to the identification in Policy 2 that 4,900 homes will be located in or adjacent to Hucknall, planning obligations or CIL contributions must be applied to secure the necessary infrastructure in Hucknall.

3.18.5 Specific types of infrastructure were identified by some respondents as requiring references in the policy. English Nature wishes to see inclusion of Green Infrastructure in the policy, with it being clear that resources for the creation and management of Green Infrastructure will be sought as part of infrastructure contributions. One Nottingham comment that there is an insufficient mention of digital technology and infrastructure, particularly given its integral importance to the economic growth of the city. However, some respondents point out that developer contributions towards new infrastructure can only be sought from development where, in accordance with Government circulars, the need for the infrastructure is attributable to that development.

Officer Response

3.18.6 It is accepted that the policy lacked sufficient detail and is not locally distinctive enough in relation to required infrastructure to support the Core Strategy's growth proposals. The policy has been amended to make clear that infrastructure necessary to support new development across Rushcliffe is identified in the Infrastructure Delivery Plans (IDP). Moreover, an appendix is included in the Core Strategy to provide a detailed summary of the main elements identified in the IDP as required to deliver the spatial strategy.

3.18.7 The policy's justification text has also been amended to make clear that the Council will work with other bodies to monitor the provision of services and infrastructure in relation to development growth and to identify any needs and shortfalls in those cases where new infrastructure may not be able to be provided through public finance.

| Number of Comments | Number of Consultees |
|--------------------|----------------------|
| 44 | 40 |

List of Respondents

Alliance Planning, Andrew Martin Associates, Ashfield District Council, British Waterways, Butler, Capital Shopping Centres, David Wilson Estates, Derbyshire Gypsy Liaison Group, Derwent Living, East Midlands Development Agency, D.J. Ellison, Erewash Borough Council - Development Management, Mr J Fenn, Foster, Government Office for the East Midlands, Mr P Green, Mr G Joseph, Keyworth Parish Council, Ms L Koban, Miller Homes Limited, Natural England (Ms Harrison), Natural England, Natural England (Mr Keymer), Nottingham Action Group on HMOs, Nottingham City Council (Ms Kelly), Nottingham City Council (Ms Orrock), Nottingham City Council (Ms Read), Nottingham City Homes, Nottinghamshire County Council, Nottinghamshire County Teaching Primary Care Trust, One Nottingham, Ms Peach, Mr and Mrs Pratt, Shire Consulting, Ms J Stone, Taylor Wimpey Developments Ltd, Thrumpton Parish Meeting, Victoria TRA, Wheeldon Brothers Ltd, Wilson Bowden Development Ltd

3.19 Developer Contributions

3.19.1 There is a reasonable level of support for the policy and a general acceptance that new development should be expected to meet the reasonable costs of new infrastructure required as a consequence of what is proposed. There is, however, criticism from a number of respondents in relation to the policy's specific wording.

3.19.2 Several respondents flagged up that, following the Community Infrastructure Levy (CIL) Regulations being enacted in April 2010, all authorities must now consider whether to introduce a CIL as a mechanism for funding new infrastructure. Others go further, making clear that authorities should definitely or have no choice but to introduce CIL. CIL would enable contributions from developers to more broadly support infrastructure requirements.

3.19.3 Nottinghamshire County Council identifies that the scaling back of the use of Section 106 Agreements will restrict the use of pooled developer contributions and so a clear strategy needs to be adopted in relation to this. They advocate that use is made of variable CIL rates for different identified zones, rather than a single rate across the entire area. Essentially, this is to ensure that those developments that most need to be supported by new infrastructure contribute most to its funding through CIL. It also asks that certain types of public sector and public service development attract a "nil rate" of CIL. The County Council also flags up the role that district councils will have to play in establishing CIL rates for minerals and waste related development.

3.19.4 There is some criticism that the policy implies that planning obligations will need to contribute to wider Core Strategies objectives, but that this is unacceptable as funding should specifically relate to the impacts of development only. It is asked that it be made clear that developer contributions will only be sought where new development creates a need for new infrastructure.

3.19.5 There is also some criticism that the policy sets out that details of planning contributions may come forward through Supplementary Plan Documents (SPD). It is argued that use of SPDs would avoid proper and independent scrutiny.

3.19.6 One respondent asks that it be made clear that affordable housing schemes should not be expected to meet the costs of planning obligations. Paragraph 3.19.3 refers to the use of thresholds for developments to trigger a requirement for a contribution but there is no indication of how and when these will be determined.

3.19.7 A number of respondents are critical of any approach to pool developer contributions, with questions raised about the legitimacy of doing so when legally contributions must be directly related to development. There is no justification for charging for the costs of monitoring planning obligation agreements, as Circular 05/2005 only refers to "preparing and completing the planning obligation agreement itself". Costs are covered by planning application fees.

3.19.8 The following are asked by one or more respondents to be added to the list at para 3.19.2:

public artwork

public transport (including services, facilities, marketing and promotion)

behavioural change measures (e.g. travel plans, marketing, promotion, etc)

Green Infrastructure creation and management (including wildlife habitats, waterways and water related assets

historic environment, including enhancement of historic streets and buildings and improved access and interpretation of key features

3.19.9 Others feel that the provision of some of the infrastructure listed in 3.19.2 would not meet the requirements of Circular 05/2009 and, as such, inclusion is not justified. For example, shopping facilities, ICT and training and employment of local people.

3.19.10 At Para 3.19.2, while archaeology does indeed need to be protected and planning obligations are a useful tool to do this, it is listed as 'infrastructure and facilities' when it is neither.

3.19.11 At Paragraph 3.19.5, Nottinghamshire County Council asks that reference is made to the need for travel plans to be enforceable. The following is suggested for the end of the para. – e.g. "...including the provision of travel plans as a condition and/or planning obligation (including penalty causes)."

3.19.12 Ashfield District Council makes the point that, in relation to the identification in Policy 2 that 4,900 homes will be located in or adjacent to Hucknall, planning obligations or CIL contributions must be applied to secure the necessary infrastructure in Hucknall.

Officer Response

3.19.13 The provisions of the Community Infrastructure Levy (CIL) Regulations, published in 2010, mean that a Council realistically has limited choice but to introduce a CIL. As a consequence of the Regulations, if a CIL is not introduced by April 2014 then the scope of the Council to maximise benefits from developer contributions will be become more limited. Not least, the extent to which developer contributions can be pooled to jointly fund new infrastructure will be restricted if a CIL is not in place at the time.

3.19.14 As with Policy 18, it is accepted that the policy lacked sufficient detail and is not locally distinctive enough in relation to required infrastructure to support the Core Strategy's growth proposals. The policy has been amended to make clear that infrastructure necessary to support new development across Rushcliffe is identified in the Infrastructure Delivery Plans (IDP). Moreover, an appendix has been included in the Core Strategy to provide a detailed summary of the main elements identified in the IDP as required to deliver the spatial strategy.

3.19.15 The infrastructure list at paragraph 3.18.2 has been amended where appropriate to take account of some of the suggested additions. Otherwise, the list is not intended to be exhaustive and does not preclude the provision of other necessary new infrastructure requirements. It is not accepted that some of the infrastructure already listed in 3.18.2 would contravene the requirements of Circular 05/2009, and, therefore, the list has not been shortened as a consequence.

| Number of Comments | Number of Consultees |
|--------------------|----------------------|
| 63 | 54 |

List of respondents

Alliance Planning, Andrew Martin Associates, Ashfield District Council, Awworth Parish Council, Barker, Bartons Public Limited Company, British Waterways, Butler, Capital Shopping Centres, Confederation Of Passenger Transport UK, CPRE Derbyshire Branch, Dale Abbey Parish Council, David Wilson Estates, Derbyshire and Peak District Transport, Derbyshire County Council - Forward Planning, Derbyshire County Primary Care Trust, Derbyshire Gypsy Liaison Group, Derbyshire Wildlife Trust, Derwent Living, East Midlands Development Agency, East Midlands Housing Association, Ebbins, English Heritage, Erewash Borough Council - Development Management, Fenn, Foster, Government Office East Midlands, Gotham Parish Council, House Builders Federation, Hunter Page Planning, Joseph, Kemp, Miller Homes Limited, Morgan, Ms L Koban, Ms Peach, Nottingham Action Group on HMOs, Nottingham City Council (Ms A Kelly), Nottingham City Council (Ms C Dyer), Nottingham City Council (Ms E Orrock), Nottingham City Council (Ms C Read), Nottingham City Homes, Nottinghamshire County Council, Nottinghamshire County Teaching Primary Care Trust, One Nottingham, Senior Planning Officer Government Office for the East Midlands, Shire Consulting, Sport England, Taylor Wimpey UK Limited, Turley Associates, Victoria TRA, Wheeldon Brothers Ltd, William Davis Ltd, Wilson Bowden Development Ltd