

## Report of the Director of Legal and Planning Services

**SUMMARY OF THE POTENTIAL OPTIONS FOR PROGRESSING THE COUNCIL'S PART 2 LOCAL PLAN (SITE ALLOCATIONS AND DEVELOPMENT MANAGEMENT POLICIES)****1. Purpose of the report**

To present to Cabinet progress made in plan preparation in Broxtowe, to present a summary of responses to public consultation undertaken in February and March 2015 on Green Belt issues and Development Management policies, to consider the appropriate way forward including updated evidence, and to outline further work required and timescales for the recommended approach.

**2. Background**

The background is contained in more detail in appendix 1. In brief, the Council has been working closely with our partners across Greater Nottingham to get aligned Core Strategies adopted. Our shared strategy is urban concentration with regeneration which in simple terms seeks to meet the cross-boundary need for development in full, but in terms of housing, to have lower provision figures early in the plan period with higher figures later. This is to allow time for sites such as Boots, Beeston Business, Park, Kimberley Brewery and several others to deliver housing in areas in need of regeneration which are more difficult to develop. . This shared approach was found sound by the Inspector and lawful following a High Court challenge, and was important in meeting our 'duty to co-operate' with our Greater Nottingham neighbours. Separate papers circulated with the agenda contain the responses to the consultations mentioned above, which follow on from the Core Strategy, and officer comments relating to some of the key issues raised.

**3. Detail**

The Core Strategy is necessary to ensure full Local Plan coverage in Broxtowe. To enable the Council to remain in control of planning decisions, it is essential that our Part 2 Plan is prepared as quickly as possible (without cutting corners which will lead to a finding of unsoundness) The detail to inform this is included in the appendices. This includes advice from Morag Ellis QC, a leading planning barrister, who advises that any attempt to reduce housing provision figures in Broxtowe will not stand a realistic prospect of being found sound. This advice is contained in a report which is circulated separately with the agenda papers.

**4. Financial implications**

There are adequate funds in existing budgets to cover the cost of progressing the Local Plan to pre-examination stage. There is no current budget for defending planning appeals which will be submitted if progress is not made. 2016/17 is the final year of the first tranche of New Homes Bonus, which the Council receives for every new home built or brought back into use. For 2017/18 the Council will need to secure £191k in new Homes Bonus to replace the lost income relating to the first tranche of the scheme.

**Recommendation****Cabinet RESOLVES that:**

- 1. Option 2 in appendix 3 of the report be Council's recommended approach.**
- 2. The timetable in appendix 5 of the report be approved.**
- 3. The officer approach to policy in general terms be endorsed.**

**Background papers**

Nil

## Local Plan Progress

### Core Strategy (Part 1 of the Local Plan)

The Core Strategy was prepared in close co-operation with our neighbouring councils across Greater Nottingham - the Broxtowe, Gedling and Nottingham Core Strategies are fully aligned. There is a shared strategy of urban concentration with regeneration with all five Greater Nottingham Core Strategies (including Erewash and Rushcliffe) having housing policies to meet the full housing need across the housing market area. For all five councils the Core Strategy forms part 1 of the Local Plan with part 2 being the detailed site allocations and development management policies.

Policy 2 of the Core Strategy comprises the spatial strategy (distribution of development) including the housing distribution policies, which the part 2 Local Plan will need to deliver. This includes a minimum 6,150 new homes to be distributed as follows:

Table 1 – Core Strategy Dwelling Requirements (Location of Development)

Area	Housing Figures
Main built up area of Nottingham (effectively the urban south of Broxtowe and areas further north east of the M1 Motorway)	3,800 (minimum)
Eastwood (including Giltbrook and Newthorpe in Greasley Parish)	1,250 (up to figure)
Kimberley (including Nuthall west of the M1 Motorway and Watnall)	600 (up to figure)
Awsworth	350 (up to figure)
Brinsley	150 (up to figure)
<b>Total</b>	<b>6150 (minimum)</b>

As the focus of the Core Strategy is urban concentration with regeneration, the distribution strategy which flows from this results in the highest amount of development including housing being steered towards the most densely populated areas in closest proximity to Nottingham. It is for this reason that the total provision and the provision in the main built up area are minimum figures. In this way new development can take the best advantage of existing transport links, particularly to Nottingham, and can assist in providing affordable housing in some of the highest value areas of the Borough but also in areas with high levels of affordable housing need. The sole 'regeneration area' in Broxtowe in the Core Strategy is at the Boots Severn Trent site in Beeston. This is not to say that there are no regeneration challenges elsewhere, but that they are smaller in scale. The justification for this strategy is that it performs best in terms of deliverability, sustainability, and maximising opportunities for economic development, job creation and contributing to local housing needs.

In terms of the timing of housing development, Broxtowe together with our aligned partners at Gedling and Nottingham were successful in arguing that a staggered (or uneven) rate of housing delivery was appropriate. The rate at which housing is expected to be delivered is often referred to as the housing trajectory. The timing of housing delivery for Broxtowe is given in the table below:

Table 2 - Core Strategy Dwelling Requirements (Timing of Development)

<b>Time Period</b>	<b>Minimum Housing Numbers</b>
2011 to 2013	200 (already built)
2013 to 2018	1800 (360 per year)
2018 to 2023	2150 (430 per year)
2023 to 2028	2000 (400 per year)
<b>Total</b>	<b>6150</b>

This was subject to much debate on the Core Strategy and a main modification was approved which explained the effect of a standard rate of delivery (or even trajectory) would be:

- Failure to protect the Green Belt/countryside through the release of more land than that required
- Failure to encourage the re-use of existing resources including conversions
- Unnecessary harm to the natural environment
- Unnecessary impact on amenity
- Failure to make effective use of previously developed land
- Failure to manage the pattern of growth to make the fullest use of public transport, walking and cycling.

There were also important amendments to the Green Belt Policy in the Core Strategy whereby it was made clear that a search sequence for sites is to be undertaken as follows:

- Firstly, land within existing development boundaries (not in the Green Belt)
- Secondly, safeguarded land (none in Broxtowe)
- Thirdly, Green Belt land adjacent to the main built up area and key settlements for growth.

Housing need and Green Belt issues were fundamental to the overall approach taken in the Core Strategy as indicated in the extensive chronology on these matters.

## Aligned Core Strategies Chronology of Events

**March 2005** - East Midlands Regional Spatial Strategy (RSS8) approved which required a strategic review of the Nottingham Derby Green Belt (Policy 14).

**August 2006** - A 'Nottingham Derby Green Belt Review' was published by Nottinghamshire and Derbyshire County Councils to inform the preparation of the East Midlands Regional Plan which ultimately replaced RSS8.

**September 2006** - Draft Regional Plan consultation.

**2006/07** - Nottingham Core Strategic Housing Market Assessment (SHMA) published. An 'old style' SHMA pre dating the National Planning Policy Framework (NPPF) and therefore not primarily aimed at determining future housing provision, but instead primarily focussing on the characteristics of the housing market and affordable housing need.

**May - July 2007** - Regional Plan Examination in Public hearing sessions held.

**November 2007** - Regional Plan Panel Report published which concluded that the 2006 Green Belt Review 'is manifestly thorough and sound according to the remit set, its methodology permits the identification of areas for excision from the Belt in terms of Green Belt criteria only. It does not, nor does it attempt to, identify areas for development on the basis of all recognised sustainability criteria, including, for example sustainable accessibility'. The panel also recommended the requirement for further review work which should include the deletion of the majority of the Nottingham/Derby Green Belt apart from the section directly between Derby and Nottingham (in Erewash and Broxtowe).

**June 2008** - The Appraisal of Sustainable Urban Extensions (SUE Study 2008) assessed locations around Greater Nottingham against a number of sustainability criteria, accessibility, environmental constraints and Green Belt issues. The Study was focussed on the edge of the main built up area (the Principal Urban Area) as well as the edges of other urban areas (the Sub-Regional Centres of Hucknall and Ilkeston) as it was prepared in the context of the Regional Strategy which steered development to these locations.

**July 2008** - The Government's response to the Regional Plan Panel Report was published which rejected any Green Belt boundary change around Greater Nottingham in the Regional Plan but endorsed the approach to review.

**March 2009** - Final Revision to the East Midlands Regional Plan published. This set the housing provision for the Nottingham Core HMA between 2006 and 2026 and for the three ACS Councils, the provision was as follows:

- **Nottingham City** - 1,000 dwellings per annum (dpa), all within Nottingham Principal Urban Area (PUA)

- **Broxtowe** - 340 dpa, of which at least 180 dpa should be within or adjoining the Nottingham PUA including sustainable urban extensions as necessary; development in the remainder of the District will be located mainly at Kimberley and Eastwood, including sustainable urban extensions as necessary
- **Gedling** - 400 dpa, of which at least 230 dpa should be within or adjoining Nottingham PUA, including sustainable urban extensions as necessary.

**June 2009** - Issues and Options consultation on the Greater Nottingham Aligned Core Strategies including an SA scoping report. This included Ashfield District, Broxtowe Borough, Erewash Borough, Gedling Borough, Nottingham City and Rushcliffe Borough Councils.

**2009** - SHMA updated for affordable housing need.

**February 2010** - The Sustainable Locations for Growth Report (SLG Report 2010) assessed the appropriateness of development in and around key settlements across Greater Nottingham other than those addressed by the SUE Study. It used similar sustainability assessment criteria to the SUE Study and consideration of Green Belt policy.

**February 2010** - Option for Consultation ACS published. This included Broxtowe Borough, Erewash Borough, Gedling Borough, Nottingham City and Rushcliffe Borough Councils.

**May 2010** - Coalition Government elected, and stated intent to abolish Regional Plans.

**November 2010** - Government's 2008-based Household Projections published.

**February 2011** - As a result of the Government's undertaking to abolish Regional Plans, Edge Analytics were commissioned to examine the implications of different housing provision figures across the Housing Market Area (HMA) using the Government's published 2008-based Household Projections. The intention was to aid decision makers in understanding the population and economic implications of housing provision decisions.

**July - September 2011 (extended to October 2011 in Broxtowe)** - Broxtowe, Erewash, Gedling and Nottingham City Councils consulted on the results of this work in the Housing Provision Position Paper (as well as climate change and District specific matters) with a position that Regional Spatial Strategy numbers remained appropriate given that these figures allowed for continuing job growth, were similar to net nil migration and were considered the maximum deliverable, being significantly higher than housing delivery historically.

Rushcliffe Borough Council separately and unilaterally consulted on their 'fresh approach' with a clear rejection of RSS but an absence of what they thought should happen in the rest of the Housing Market Area (HMA).

**October 2011** - Additional SA workshops held to assess reasonable alternatives including consideration of higher and lower housing figures across the HMA and within each Council's area, and the economic implications of different growth options.

**January 2012** - As part of a package of measures to support councils through Core Strategy preparation, PAS gave pre-publication advice to the four aligned Councils and identified what they saw as a mismatch between economic ambitions/job provision and the housing figures to meet these. They advised that for the plan to be found sound, clear evidence reconciling the housing provision and the economic/job aspirations of the Core Strategies would be required.

**February 2012** - Edge Analytics were again commissioned to examine the population and labour market implications of using 'rescaled' headship rates (based on local information on actual headship rates, as opposed to those assumed by the Government's Household Projections) of the housing provision in all five HMA Council's emerging Core Strategies. Rescaled rates in Broxtowe, City and Rushcliffe showed that even with Rushcliffe's reduced figure there was provision to allow a net in migration of 1,200 people per annum with sufficient labour force to match with the job ambitions of the Core Strategies. The aligned Councils consider this to be an objective assessment of need, because the housing provision accords with the jobs/economic policies of the Core Strategies, and although the Core Strategy housing provision allows for a lower level of in-migration than that used by the government's Household Projections, they consider that there are good reasons to conclude that the levels of in-migration assumed in the Household Projections will not continue into the future.

**March 2012** - National Planning Policy Framework published. This clarifies that SHMAs should be prepared to assess full housing needs of areas.

**June 2012** - Aligned Core Strategies published covering Broxtowe Borough, Gedling Borough and Nottingham City Councils, alongside evidence in the various background papers and a Sustainability Appraisal. (Erewash Borough Council also publish their Core Strategy later in June, as a separate document), but relying on the same Sustainability Appraisal.

**July 2012** - First round of data from the 2011 Census published. Further work by the aligned Councils concludes that the rescaling of headship rates is supported by the new evidence, but that the previous work had overstated somewhat the level of population supported by the housing provision, i.e. it overstates the implied level of in-migration to Greater Nottingham. The revised estimate concludes a level of in-migration of 850 per annum would be supported rather than 1,200. Further work on economic activity rates taking account of the 2011 Census can only be tentative, but it demonstrates that the labour force resulting from this level of housing provision is likely to still broadly support the economic and job aspirations of the Core Strategies. A major reason for this conclusion is that the former work took insufficient account of economically active people aged over 65.

**November 2012** - SHMA updated for affordable housing need.

**January 2013** - Government announcement confirming Toton as the Government's preferred location for a hub station to serve the East Midlands.

**February 2013** - Amendments to the ACS published to provide for inclusion of the land in the vicinity of the proposed High Speed 2 Station as a strategic location for growth together with amended SA on this specific matter.

**8 April 2013** - Communities and Local Government Interim 2011-based household projections published. Strongly support the Council's approach to rescaling of headship rates for the 2008-based Household Projections.

**12 April 2013** - East Midlands Regional Plan revoked.

**7 June 2013** - ACS submitted for Examination.

**19 September 2013** - Councils and other interested parties submit statements on the Inspector's Main Matters, Issues and Questions.

**15-17 October 2013** - First week of Hearing Sessions dealing with Sustainability Appraisal, Duty to Cooperate, Objectively Assessed Housing Need, housing distribution in general terms (not site specific), Green Belt, and economic development (ACS policies 2 to 4 inclusive).

**5-7 and 12 and 13 November 2014** - Further Hearing Sessions dealing with the Environment, Transport, Infrastructure and delivery and site specific matters in relation to Broxtowe (on 7 November all day) and Gedling (on 12 November all day) together with proposed modifications to the plan.

**22 November 2013** - Inspector issues a note confirming additional work she wants the Councils to do.

In respect of Gedling she questioned whether the identified locations and sites for growth were consistent with a strategy of urban concentration with regeneration and to investigate infrastructure issues around Hucknall and opportunities for increasing housing provision around the main built up area of Nottingham.

In respect of Broxtowe she suggested that depending on the number of homes, which the Plan promotes at the Toton strategic location for growth, it will be necessary to consider the likely impact on other planned sites and locations including Brinsley, Kimberley, Eastwood and Field Farm.

**December 2013** - Gedling complete their work and send to the Inspector.

**January 2014** - Broxtowe complete their work and report their proposed modifications to Full Council who endorse the approach and Broxtowe then send to the Inspector.

**January 2014** - The Home Builders Federation submit a legal opinion asserting that the ACS policy in relation to housing provision is unlawful with regard to the Hunston Court of Appeal judgment. They assert that once the OAHN has been set the only

lawful policy approach is to meet it in full (with no lower delivery early in the plan period) unless constrained by NPPF compliant factors (not the economy).

**January 2014** - In response to the HBF opinion the Councils commission advice from Leading Counsel. This rebutted the HBF legal opinion and was circulated to the examination.

**January 2014** - Inspector calls further hearing sessions to debate the Gedling and Broxtowe changes, an additional session to accommodate Toton residents, and the implications of Hunston for the ACS.

**11-13 February** - Final week of hearing sessions to debate the Gedling changes (all day on 11 February) the Toton development and Broxtowe changes (most of the day on 12 February) and the implications of Hunston for the ACS.

**March – April 2014** - Councils consult on Main Modifications (including SA) to make the plan sound and then send to the Inspector.

**24 July 2014** - Inspector issues final fact checked report to bring the Examination to a close.

**2 September 2014** - Ken Mafham Associates submits a letter identifying flaws in the ACS and requests that the Councils do not adopt the plan (later confirming it should be treated as a letter before claim).

**8 September 2014** - Nottingham adopt the ACS.

**10 September 2014** - Gedling adopt the ACS.

**17 September 2014** - Broxtowe adopt the ACS.

**20 October 2014** - Legal challenge submitted to the High Court on behalf of Calverton Parish Council.

**24 March 2015** - Hearing of the legal challenge in the High Court.

**21 April 2015** - High Court 'Approved Judgment' issued. The challenge was dismissed. With regard to the Inspector's consideration of Green Belt issues in the context of housing need, the judge was satisfied that the acuteness of the need for homes is such that some incursion into the Green Belt (and its consequent revision) will be required. Both in general terms and in relation to specific locations at Field Farm and Toton, the Inspector was satisfied that exceptional circumstances for Green Belt boundary change had been demonstrated and the approach followed was lawful.

**APPENDIX 2****Evidence Base Updates****Retail Report Summary****Beeston**

The report was undertaken by Carter Jonas and confirms that Beeston is a popular and successful centre and current investment suggests it should continue to be vital and viable. Floorspace projections suggest there is the potential to extend existing foodstores or for the creation of one or two 'local' format foodstores. It is suggested that the centre would benefit from enhancement of the public realm environment in the vicinity of Station Road/High Rd/Wollaton Road junction and there is an opportunity to enhance the shopping offer in the eastern part of the High Rd to transform it to a complimentary offer to the central shopping area rather than a secondary offer. It is suggested that there is a gap in leisure and culture provision which potentially could be plugged. It is recommended that a reduction of the primary shopping area should be considered.

**Eastwood**

The report suggests that Eastwood district centre has an important role in the community however, the physical separation of Morrisons to the remainder of the Primary Shopping Area minimises the potential for linked trips and has a negative impact on viability and vitality. It is proposed that consolidation of the existing centre is a more realistic option than expansion due to the competition from the nearby Giltbrook Retail Park. Floorspace capacity analysis suggests there is the potential for expansion to the existing food stores or the creation of up to two 'local' format foodstores or potentially one large supermarket. It is suggested that promotion of leisure activities and the evening economy would benefit the centre. No alterations to the primary shopping area are recommended.

**Kimberley**

The report indicates that Kimberley is a generally healthy centre which is popular with its immediate catchment area. The Sainsbury's store acts as a key anchor and there is a strong set of specialist independent retailers. The centre attracts many pedestrians and therefore it is suggested that enhancement to the pedestrian environment and increasing the diversity of offer is important to maintain the centre's health. In terms of floorspace projections it is suggested that there is potential for the creation of one new 'local' foodstore or a modest sized supermarket/discount foodstore. It is suggested that there is scope to reduce the primary shopping area to exclude Station Road and the long term vacant units west of the post office which could be used for other purposes such as residential.

**Stapleford**

It is considered that Stapleford is a relatively healthy centre but is underperforming in relation to other centres in Broxtowe mainly due to the lack of a main food retailer to

act as an anchor and the fact that the primary shopping frontage is limited to one side of Derby Road only. The existing Co-op serves as the main convenience retailer and it is suggested that the primary shopping frontage is altered to include this unit in order to allow it policy protection from out of town retailers. It is also suggested that the former police station be included in the primary shopping area to aid its future development. The centre has the lowest floorspace capacity of the centres in Broxtowe and it is projected that any future increases in floorspace are likely to be limited to extensions to existing 'local' format stores.

### **Edge and Out of centre retail**

The consultants suggest that a policy which places a threshold at 500sqm on edge and out of town retail development is applied. This would mean that any proposals for development above this size out of the town centre will be required to demonstrate that they will not have a significant impact, in terms of viability and vitality on the defined district centres on their own or cumulatively. If contained within a local plan policy this will take precedent over the threshold of 2500sqm as contained in the NPPF. This will have an impact for proposals for expansions to the Borough's main retail parks, Chilwell and Giltbrook.

## **Employment**

### **Employment Land Forecasting Study**

Nathaniel Lichfield and Partners (NLP) were commissioned by the authorities of the Nottingham Core and Nottingham Outer Housing Market Areas (HMAs) to prepare up-to-date evidence on economic prospects and employment land forecasts for the period to 2033. The 'Employment Land Forecasting Study' (ELFS) was consequently produced in August 2015. The need for the Study arose from Policy 4 of the Aligned Core Strategies (ACS), which requires the authorities to keep under review the need for, and supply of, office floorspace and industrial/warehousing land. The Study will form part of the evidence base for emerging development plan documents, including the Broxtowe Local Plan.

The conclusions of the ELFS include 'scenario ranges', which are based on various demand-based and supply-based scenarios, for each authority for both office floorspace and industrial/warehousing land. For Broxtowe, the scenario range for office floorspace is between 26,482 sq m and 59,886 sq m, which compares with an ACS requirement, extrapolated to 2033, of 44,000 sq m. The scenario range for industrial/warehousing land is between 5.3 ha and 43.2 ha, which compares with an extrapolated ACS requirement of 19.5 ha. The ACS requirements for Broxtowe are therefore within both of the ELFS scenario ranges.

The ELFS indicates (as did the previous Volterra report) that the HS2 station has the potential to result in between 2,800 sq m and 19,800 sq m of office floorspace, which could support up to 1,500 new jobs in Broxtowe, which is the jobs figure originally suggested by HS2, once the station is operational. NLP comment that it is 'higher value' sectors, such as financial and professional services and company headquarters, which are likely to place greater weight on access to high speed rail services.

NLP also comment that for most businesses, general proximity to the HS2 hub may be sufficient rather than necessarily requiring a site immediately adjacent to the station. However, a high profile new development associated with the HS2 hub may serve to create a new urban district with a critical mass a mix of uses and facilities that could be attractive for some types of firms moving into the area.

A Background Paper is being prepared by the Nottingham Core authorities. This will accompany and respond to the ELFS, and it will provide a more specific basis for the provision for office floorspace and industrial/warehousing land in the forthcoming Part 2 Local Plans.

## APPENDIX 3

**Recommended Approach**

With regard to the advice of Morag Ellis QC which is circulated separately with this agenda, any attempt to fundamentally revisit issues which are addressed in the Core Strategy, including the overall number of new homes and the general approach to Green Belt Review, would stand no realistic prospect of success. In the opinion of Planning and Legal officers there is no credible reason to reject this advice. In particular it is not considered that the updated evidence summarised in appendix 2 gives rise to a need to change approach to that outlined in the Core Strategy, which is that opportunities should be taken to enhance the four existing centres in Broxtowe, and employment needs should be met. There is, however, some room to consider different options in the preparation of the Part 2 Local Plan in relation to the potential for Green Belt boundary change and these are set out below.

Part 2 Local Plan

One of the fundamental purposes of the Part 2 Local Plan in terms of site allocations is to identify sufficient sites to meet Core Strategy housing targets, and to provide a five year supply of deliverable housing sites. The Strategic Housing Land Availability Assessment (SHLAA) is important evidence to inform decisions on the appropriate amount and timing of new housing to allocate outside of existing built up areas. The most recent version of the SHLAA was published in January 2015 and the availability of sites is shown in the table below for the Core Strategy Plan period to 2028.

Table 3 – Housing Supply

<b>Area</b>	<b>Urban Housing Supply Including Sites Identified in the Core Strategy</b>	<b>Additional Dwellings Required To Meet Core Strategy Figures</b>
Main Built up area of Nottingham	3,443 including Core Strategy sites at Field Farm (450 homes) and Toton (500 homes)	357
Eastwood (including Giltbrook and Newthorpe)	1084	166
Kimberley (including Nuthall west of the M1 and Watnall)	451	149
Awsworth	104	246
Brinsley	41	109
Other rural	2	
<b>Total</b>	<b>5125</b>	<b>1025</b>

The content of the Part 2 Local Plan in terms of the amount and timing of housing allocations will need to be informed by the most up to date evidence in the SHLAA which is in the process of being reviewed now. However, the general picture of having available a combination of urban and windfall sites together with Field Farm and Toton on which just over 5,000 new homes could be constructed, in the absence of substantial sites becoming available that are not currently available, is unlikely to

be radically different when the SHLAA is reviewed this year. Moreover, the speed at which large sites are likely to be developed is expected to be slower than anticipated when the SHLAA was reviewed last year. A very clear principle, irrespective of difficulties in demonstrating a five year housing land supply, is that in line with the Core Strategy approach, the more planning permissions that are granted and dwellings built on appropriate urban sites, then the lower the pressure is to release Green Belt sites not identified in the Core Strategy, particularly in the early years of the plan. In this regard the rate at which houses are already being built will be a factor in this as we are now 2 years into the first five year tranche of the Core Strategy period. Ideally a minimum of 720 homes would have been built between 2013 and 2015 (360 x 2). The net housing completion figure (taking into account demolitions) for these two years is 228 which is almost 500 short of target. Although it was always envisaged that it would take time to build up to the 360 figure, this completion rate is substantially lower than expected in the Core Strategy trajectory, and it will reduce the likelihood of an Inspector endorsing an approach in the Broxtowe Part 2 Local Plan which seeks to defer Green Belt releases to later on in the plan period as the development industry will be arguing strongly that Green Belt releases are needed early to catch up with the deficit in supply and to provide sufficient sites for a five year housing land supply.

The five year supply was most recently reported in the SHLAA in January 2015 using a September 2014 base date for completions and permissions. This demonstrated that for the five year period of April 2015 to March 2020 Broxtowe was able to demonstrate a five year supply of 2489 dwellings against a requirement of 2165 (i.e. a supply of 5.7 years).

The following points are important factors which will have a negative impact on the Council's ability to demonstrate a five year supply when the SHLAA is reviewed in the autumn of this year and currently timetabled to be published in the New Year:

1. The NPPF requires a five year supply to include a buffer (increase) of 5% but where there has been 'a persistent record of under delivery of housing' the buffer should be increased to 20%. Previously Broxtowe argued we are a 5% uplift authority on grounds that delivery was much better before the recession and the Core Strategy would help to significantly improve delivery. Even allowing that the Core Strategy has only been adopted for a year it is highly likely that any Inspector via a planning appeal or at a Part 2 Local Plan examination will now conclude that Broxtowe is a 20% uplift authority on the grounds of persistent under delivery. Ever since the effects of the recession hit, housing completions in Broxtowe have been low with completion figures of under 100 in three out of the last six years with the highest rate in any of these six years being 222 and this was due to very high affordable housing completions in that particular year. The 'target' for most of these years was The East Midlands Regional Plan which had an annual target of 340 homes a year for Broxtowe which was similar to that now required in the Core Strategy.
2. Any shortfall in housing can be added in one of two ways. If the shortfall is not severe it can reasonably be added over the whole plan period (to 2028) giving a lower figure in the five year supply period. If the shortfall is severe (and in Broxtowe it is difficult to construct any other argument than it now is) then this increases the prospect of an Inspector concluding that the shortfall should be added in full to the five year supply period in question.

3. To demonstrate that a site is 'deliverable' to the extent that it can be included in a five year supply it is a huge help (but not an outright requirement) if planning permission is in place. It will not be realistic, other than in circumstances of ironing out minor issues of detail, to include sites in the five year supply that have been refused planning permission, as they are unlikely to be 'deliverable' in the five year period in question.
4. The most recent version of the SHLAA indicated that Field Farm would deliver 450 homes and Toton 370 during the five year period (between April 2015 and March 2020). Despite the best efforts of all concerned, progress on bringing both of these sites forward has been slower than anticipated. Although the detailed work on delivery has not yet been done for the 2015 SHLAA review, at this stage it appears highly likely that a start date on both sites is likely to be at least a year further away than originally anticipated and the rate at which housing is built particularly on Field Farm is likely to be slower, as it is now understood that the market housing will be built out solely by Westermans, which makes it very difficult to envisage market housing completions of more than 50 dwellings a year. If two house builders were building concurrently then the annual completion figures could realistically have been double this.
5. When the five year supply is reviewed this year, there will be a higher overall target irrespective of the backlog, as the staggered trajectory referred to earlier will lead to one more year of a target of 430 completions in place of one less year of 360 (an increase of 70).
6. These five points in combination means that when the detailed work is done in the autumn there is a serious risk that Broxtowe will not be able to demonstrate a five year housing land supply, and it's possible that Broxtowe will be substantially short. Clearly this evidence is not currently available, and it is possible that the situation may be better than currently expected. However, even allowing for this in the short term, the immediate steps that Broxtowe can take to improve the supply is in granting planning permission for previously developed brownfield sites, but also greenfield sites within development limits. The prospect of successfully defending appeals against refusals on urban sites in the absence of a five year housing land supply and a compelling technical refusal reason, supported by the relevant statutory consultee, is considered to be small. In the medium term it increases the prospect of an Inspector at a Part 2 Local Plan examination requiring robust policies to be in place to ensure that the overall delivery of housing is achieved, together with any backlog it may prove necessary to impose. The predictable stance of the development industry will be that new sites (in the Green Belt) are needed now, given the very low current completion rates on urban sites.

With reference to these points there are three broad options for members to consider with regard to the allocations part of the Part 2 Local Plan. All of these options assume a Local Plan time period to dovetail with the Core Strategy with an end date of 2028 which is considered the appropriate basis on which to plan as the Part 2

Plan will be the delivery mechanism for the Core Strategy development requirements. These options are:

Option 1. Allocate sites on which a minimum of 6,150 homes (minus completions) can be built with some allowance for windfalls (300 in the Core Strategy) but also flexibility/contingencies for what happens if some sites do not come forward. These sites, whether as a result of Green Belt boundary change or existing urban sites, would all be made available for residential development at the point of adoption of the Local Plan with no phasing mechanism in place. This would be the approach that would show the clearest commitment to the delivery of new homes.

Option 2. Take a similar approach to Option 1 but, in addition, include a phasing mechanism which gives priority in terms of the time at which sites come forward to include a preference for previously developed urban sites. In this way current Green Belt sites to be allocated not specifically identified in the Core Strategy (i.e. all of them apart from Field Farm and Toton) would form a 'second tier' or 'phase 2' of housing release which would only be released for development once existing completions dropped below the Core Strategy requirements. This would be the approach that strikes the most even balance between housing delivery and Green Belt protection and most closely relates to the strategy of urban concentration with regeneration.

Option 3. Allocate only sites within existing development limits in this Part 2 Local Plan and have a policy of further Green Belt/Local Plan review at some point in the future if delivery drops below the Core Strategy requirements. This would put at serious risk the delivery of housing overall, as Broxtowe would be faced with relying on a very large scale of windfall sites (sites Broxtowe are not currently aware of) to plug the gap currently identified as 1025 new homes over the whole plan period and this assumes that all of the other sites including Boots, Beeston Business Park, Kimberley Brewery and various others all deliver the numbers of homes currently anticipated. If they do not then the gap between housing delivery and housing requirement will get wider. Although on the face of it this is the option that offers the greatest protection to the Green Belt, in the opinion of officers it does not do so, as discussed in more detail below.

### Officer Comments

The consultation responses circulated separately with this agenda contain a number of sensible suggestions as to how detailed policies should be drafted to appropriately address issues such as flood risk, conserving and enhancing the historic environment, infrastructure provision, wildlife protection amongst others. It is not the purpose of this report to consider a detailed response to these issues as this will need to be informed by site specific Sustainability Appraisal and other technical work which is outlined in appendix 4.

It is the purpose of the report to consider and receive a steer from members as to the appropriate approach to balancing development requirements (mainly housing) with Green Belt protection. The consultation response indicates a clear preference from members of local communities for existing Green Belt boundaries to remain as they are with some pointing to the availability of Brown field sites to support their case.

The development industry on the other hand point to sustainability, and other credentials of specific sites, and suggest that Green Belt boundary change is required to meet Core Strategy development requirements. All of these comments have been taken into account in the commentary below.

Of the three options above, Option 3 is considered by officers to stand no realistic prospect of being found sound at examination. It will put in serious jeopardy the delivery of Core Strategy housing delivery targets, as without at least some Green Belt boundary change, existing evidence is that housing requirements cannot be met within existing development limits even when including 450 homes at Field Farm and 500 at Toton. Even with a review mechanism, it is not considered that this will be convincing to an Inspector. There is a difference here between a Local Plan whose fundamental aim is the delivery of development (as in the plan Broxtowe is now preparing) as opposed to a Strategic Plan setting the over-arching strategy and the need for new development (as the Core Strategy does) with the detailed delivery plan to come later. For a Strategic Plan it is possible (although still difficult) to convince an Inspector with an argument of early review. The plan Broxtowe is preparing here needs to contain allocation policies that when read in conjunction with each other, will convince an Inspector that there are mechanisms in place to ensure that the required number of new homes will be met without the delay that a plan review would entail. In the opinion of officers Option 3 does not do this. What it is likely to result in is a significant upturn in planning applications and then appeals for sites currently in the Green Belt. As Morag Ellis advises, there can be no security that such applications will be rejected at appeal, as the five year supply position gets worse due to an absence of deliverable housing sites and potential further delays. Although the Government have made statements to the effect that the appeal process is not the appropriate mechanism to allow Green Belt development, this position may change if housing delivery figures remain low and the backlog of required homes gets greater.

Of Options 1 and 2, in the opinion of officers Option 1 is most likely to be found sound at examination provided this approach is combined with a clear delivery strategy to bring forward more difficult to develop urban sites. The reason for this conclusion is that housing completions are already nearly 500 homes below Core Strategy delivery targets and by the time the Plan is submitted for examination, the backlog is likely to have gone up, given that there is no solution that can take effect in the immediate term. There is always a lag of at least one year and often two between planning permission being granted and development taking place. Currently there are simply not enough sites which are ready to commence the delivery of housing, and those that are currently under construction will not get close to the required 360 homes a year. A phasing mechanism will therefore not be a straightforward matter on which to convince an Inspector as Broxtowe will need to have policies to catch up in terms of housing delivery from the very point at which the plan is submitted.

Option 2 is not without any prospect of success and if this approach is pursued it will be essential to convince an Inspector that the issue of slow delivery (as it still will be a year and even two years from now), is not to do with the lack of availability of sites and that the Council is doing all that it can to bring such sites forward. The following points are ones that will assist in this:

1. A plan led approach to development at Toton will be the most immediate step available. The Core Strategy specifies the following minimum development requirements –
  - i) 500 homes
  - ii) 18,000 square metres or more of employment land
  - iii) 16 hectares or more of green infrastructure
  - iv) Safeguarded tram route to the station
  - v) Safeguarded vehicle route to the station.

In addition Cabinet at its meeting in December 2014 specified the following points be included in the consultation undertaken in February 2015 with the site specific comments relating to Toton reported to the HS2/ Toton Advisory Committee at the meeting in July 2015 –

- i) Adequate land for a school expansion
- ii) Only local (non-strategic) scale retail in any local centre
- iii) Footpath maps updating
- iv) A north/south wildlife corridor.

A village green inquiry was held in April/May 2015 which included land to the east of the proposed HS2 station. The County Council has refused the application which means that the land in question does not have the significant constraint that such a designation would entail. This does not preclude Broxtowe from concluding that maintaining the land as open space is appropriate but other options are also available for consideration.

Employment needs update work has recently been undertaken and this is summarised in appendix 2. This indicates that evidence in the Core Strategy, both in terms of Borough-wide requirements and the approach to Toton remains appropriate.

Sir David Higgins (Chair of HS2) has indicated that the issues associated with Toton are well on the way to being resolved and he praised the East Midlands Councils for the work collectively undertaken to demonstrate the clear advantages of a station at Toton.

A programme is underway to consult on further possibilities for the location over autumn 2015 with this consultation due to conclude in November 2015. At the end of this consultation it will be important to conclude on the Council's view as to how development should take shape with sufficient steer to enable a planning application to be amended to be in line with the Council's expectations.

2. Viability evidence to inform our Part 2 Local Plan is nearing conclusion. We may be able to tailor expectations of contributions in particular in the lower value areas of Broxtowe to assist in the delivery of housing. This decision will need to be taken in the submission version of the plan once the evidence is available.
3. National government initiatives are increasingly pressuring Councils to proceed down a route of loosening planning controls for previously developed sites that do not have planning permission. Part of this is a 'Local Development Order' scheme. It may be sensible to consider the merits of

relaxing S106 contributions (possibly for temporary periods perhaps with overage clauses if viability improves) in some circumstances to enable Planning Permission to be granted and schemes built.

4. A further call for sites and a developer panel to discuss in more detail obstacles to delivery on previously developed sites will form part of the current SHLAA review. Other Councils in the Greater Nottingham area are achieving substantially higher rates of housing completions and the work with this panel is intended to gain a clearer understanding of obstacles to delivery and how these can be addressed.
5. A Greater Nottingham wide SHLAA/Monitoring group has been set up to look at good practice regarding five year supply/delivery issues. This is intended to share good practice and achieve a consistent approach across Greater Nottingham.
6. The Planning Development and Regeneration Manager post at Broxtowe is a new one with a remit to bring forward previously developed sites.

On balance, therefore, it is considered that although there are significant risks in relation to Option 2, this is the general approach which, taken in conjunction with decisive action to increase housing delivery as outlined above, will strike an appropriate balance between housing delivery and Green Belt protection, will be consistent with the principle of urban concentration with regeneration set out in the Core Strategy, will be consistent with national and local policy to prioritise brownfield sites, and will give sufficient comfort (although not as much as Option 1) that housing delivery targets will be met. It will not be possible to take site specific decisions until further evidence is assembled and this is discussed in appendix 5.

**Further Evidence Required to Support the Part 2 Local Plan**

SHLAA review. This is underway and can be met within existing budgets.

Site Specific Landscape Character Appraisal. This will be commissioned from within existing budgets, unless members determine that Option 1 is the approach to follow (in which case no allocations outside of existing settlement limits will be considered).

Additional heritage assessment, including the conclusion of the Conservation Area Appraisals. This is required to address the concern of Historic England and can be met within existing budgets.

Site Specific Sustainability Appraisal. This will be undertaken in house and can be met within existing budgets.

Site Specific Infrastructure Delivery Planning. This will be undertaken in house and can be met within existing budgets.

Playing Pitch Strategy. This is underway and is being met within existing budgets and will address the objection of Sport England as they are involved in the steering group for this work.

Plan-wide viability assessment. This is underway and is nearing completion and is being met within existing budgets.

Gypsy and Traveller Accommodation Assessment. This is nearing completion and has been met within existing budgets.

It is not currently considered that a new Strategic Flood Risk Assessment will be needed as one was undertaken for the Core Strategy which included consideration of the left bank flood defences.

## APPENDIX 5

**Timescales**

The completion of the above necessary evidence base reports can be undertaken in sufficient time to allow for a report to be taken to Cabinet on the submission version of the Part 2 Local Plan shortly after the summer holidays in 2016. This will also allow time to follow a workshop based informal consultation over the spring of 2016 on a similar basis to the approach Gedling adopted which appeared to work well. If members require any more formal consultation, prior to a required six week consultation on the draft Plan, then this will add the time of any consultation plus a few weeks preparation time beforehand and consideration and reporting responses at the end.

If a Draft Plan is ready and approved by Cabinet (or whichever committee replaces Cabinet) in September 2016, then the timescales from this point would be a six week formal consultation to conclude in November 2016. Consider responses and submit the Plan during the winter of 2016/17, realistically January 2017. Depending on any concerns of the Inspector Examination hearing sessions could be held in late winter/early spring 2017 with adoption by mid-2017.

If members agree with this approach then a formal revision to the Local Development Scheme will be reported to Full Council for approval. It should also be noted that if there is a significant upturn in Neighbourhood Planning work, then the above timetable may slip unless additional resources are made available. In addition it is hoped that the timetable would provide a useful guide for town and parish councils to align their own timescales for preparing neighbourhood plans.

Table 1 – Draft Work Programme

<b>Dates</b>	<b>Work</b>
13 October 2015	Cabinet decision on preparation on Part 2 Local Plan
October/November 2015	Additional consultation on development in the vicinity of the proposed HS2 station at Toton
December 2015	Decisions by HS2 Toton Advisory Committee and Cabinet on the appropriate amount and mix of development in the vicinity of the proposed HS2 station at Toton
October 2015 to Summer 2016	Undertake and conclude additional evidence listed in appendix 4
New Year 2016	Members to consider a report regarding the merits of preparing a CIL charging schedule once plan wide viability evidence is concluded
Spring 2016	Sequence of workshops on the following topics: Sustainability appraisal; design; heritage; transport; housing; community facilities; infrastructure; climate change; natural environment; open space; Green

	Belt; employment; and retail
Spring 2016 to late Summer 2016	Prepare draft Part 2 Local Plan
Autumn 2016	Member decision on publication of Part 2 Local Plan for 6 weeks of formal representations
Autumn 2016 to Winter 2016	Consider responses and amend Part 2 Local Plan as required
Winter 2017	Member decision on submission of Part 2 Local Plan for independent examination
Winter 2017 to Spring 2017	Likely dates for examination hearing sessions
Spring 2017 to Summer 2017	Consult on main modifications to the Part 2 Local Plan if required
Summer 2017	Receive Inspector's report and adopt Part 2 Local Plan subject to Full Council approval

Who	Policy Number/Description	Respondent Comment	Broxtowe Borough Council Comment
<b>National Interest Groups</b>			
Natural England	E16 Sites of Importance for Nature Conservation	NE “generally agree with the analysis for this policy”, “particularly support the idea of including advice regarding the natural environment at the landscape scale, biodiversity networks and species protection” and “agree that it is important to link this policy with policy on green infrastructure”.	Noted and points will be considered.
	E24 Trees, hedgerows and Tree Preservation Orders	NE “would wish to see a policy to protect ancient woodland and aged or veteran trees to comply with paragraph 118 of the NPPF”.	Will incorporate request in amended policy.
	E33 Light pollution	NE “support” a policy on light pollution. Reference should be made to “negative impact on local amenity, intrinsically dark landscapes and nature conservation (especially bats and invertebrates)” and to the use of “appropriate design” to address such impacts.	Will incorporate request in amended policy.
	Possible new policy Reducing CO2 emissions (p. 18)	NE “suggest that a policy regarding renewable energy schemes should particularly include the avoidance of potential impacts on nature conservation and local landscapes” and “suggest that an assessment of landscape sensitivity is carried out before locations of schemes are agreed”.	Will incorporate request in amended policy.
	Possible new policy Design (p. 20)	Policy should “include provision to encourage “Biodiversity by Design”” (a link to a relevant part of the TCPA’s website is provided). This should encourage “incorporating ecologically sensitive design and feature early on within a development scheme”; measures “can include green roofs, planting and landscaping using native species, setting up bird and bat boxes and sustainable urban drainage systems”.	Will incorporate request in amended policy.
	Possible new policy Landscape (p.23)	NE “supports the idea of a policy on landscape which uses information set out in the [Greater] Nottingham Landscape Character Assessment”. It also suggests that “reference should be made to the National Character Areas”, which are “a good decision making framework for the natural environment”.	Will incorporate request in amended policy.
	Possible new policy Green Infrastructure (p. 24)	NE “agrees that any new policy will need to complement the Council’s emerging Green Infrastructure Strategy. It should integrate with other policies such as biodiversity, green space, flood risk and climate change adaptation”.	Will incorporate request in amended policy.

Environment Agency	RC8 New informal open space	NE “recommend the use of the Natural England’s Accessible Natural Greenspace Standards (ANGSt)”, which “provides a powerful tool in assessing current levels of accessible natural greenspace and planning for better provision”.	This request can be addressed via ongoing work in the Council’s Playing Pitch Strategy.
	RC15 Long distance trails	NE “agree... that reference to the Council’s emerging Green Infrastructure Strategy should be made”.	Noted and points will be considered.
	SA Scoping Report	NE “generally supports the scoping report but would like to have seen reference to the National Character Areas”.	Reference can be added.
	E27 Protection of groundwater	The EA “would wish for it to be retained rather than merged into other policies. This approach is important for Broxtowe as the district is situated on principal and secondary aquifers”.	Policy should be retained in some form as requested.
	E29 Contaminated land	The EA “do not agree that there is no need for this policy. Former contaminative uses for example petrol stations or cemeteries pose a risk to groundwater and drinking water supply, but are not covered by environmental permitting regulations”. They “point out that issues around contaminated land is an environmental consideration and is not exclusive to human health matters”.	Policy should be retained in some form as requested.
	Possible new policy Flood risk – sequential and exception tests (p. 17 and appendix B)	<p>The EA “have some serious concerns about the wording of the current draft and would not be able to support the draft policy in its current form”.</p> <p>“There is a need for clarification within the policy wording on which types of development would be subject to the principles of the Sequential and Exception Test elements of the policy.”</p> <p>Clarity should be added on the Exception test “to state that <u>only</u> the first part of the requirement for ‘wider sustainability benefits’ will be waived and the need to undertake a Flood Risk Assessment that demonstrates development will be safe and does not increase flood risk elsewhere, will continue to be complied with”.</p> <p>The EA “challenge the proposal to consider the term ‘minor development’ as less than 10 dwellings within the defended area”, as this is contrary to the PPG, and “small scale” [in the explanatory paragraph] needs to be defined.</p>	<p>The key point appears to be that the Environment Agency agree that the Trent Defences are of an “appropriate standard” and therefore they accept that the ‘wider sustainability benefits’ aspect of the exception test can be “waived”, which means that, subject to site-specific Flood Risk Assessments being done, small-scale developments would be allowed in Attenborough and the Rylands.</p> <p>This matter appears to be resolvable by stating clearly in the policy that for the</p>

		<p>The EA notes that “the tenor of the explanatory paragraph text is not replicated in the proposed policy wording”.</p> <p>The policy has “a number of phrases which are poorly defined and would be hard to understand and apply by all parties in the planning process”, including ‘where a risk of flooding or problems of surface water disposal exist’, ‘existing developed’, ‘adequately protected’, ‘suitable’ and ‘no adverse effects on the management of flood risk’.</p> <p>It is “important” that the “message is clear in the final policy wording” that the policy “relates only to a particular area that is defended to an appropriate standard”.</p> <p>Bullet A) “is simply application of the NPPF without any references to your justification of the variations proposed in the explanatory paragraph text and makes the flood risk policy aspirations unclear”.</p> <p>In bullet B), “further clarification is needed in regard to the term ‘compensation’ in the draft policy or whether the council’s intended requirement is for mitigation measures”. “Where an area benefits from an appropriate standard of flood protection (such as the river Trent defences) the Environment Agency does not normally seek flood compensation.”</p> <p>The “requirement for flood mitigation is and must be applicable to all sites (defended or not) and the requirement for flood ‘compensation’ is and must be for all sites that are not defended or have a sub standard level of flood defence”.</p> <p>If the draft policy “is intended to suggest that no mitigation...works are necessary for developments of less than 10 dwellings, it will be strongly opposed by the EA”; and “any policy where flood compensation is not an absolute requirement in non defended or sub standard defended areas is not acceptable to the EA and will be resisted”.</p>	<p>purposes of the sequential test and the exception test the Council’s Strategic Flood Risk Assessment will be used to assess risk. This then takes proper account of the Left Bank defences.</p> <p>Some points relate to apparent misunderstandings, as any policy would seek to ensure flood mitigation measures are incorporated into new development.</p>
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		<p>In bullet C), the reference to ‘adverse effects’ “will need to be clearly defined”.</p> <p>In bullet D), the EA “would suggest that additional wording is included for ‘flood risk management assets’ to ensure that access is maintained at all times”.</p> <p>In bullet E), the EA “recommend that the policy needs to be more proactive in that it leads to an actual reduction in surface water run-off, rather than a simple no worsening principal”. The EA also “question how the policy will be made to apply to ‘off site measures””.</p> <p>The EA “request that this draft policy is revised, and we would be happy to have further discussion around the detail of the proposed changes.”</p>	
	Possible new policy Flood risk – Sustainable Drainage Systems (p. 18)	The EA “support the inclusion of the principle of the policy with details to follow once the necessary system is known and approved”.	Noted and points will be considered.
	Possible new policy Green Infrastructure (p.24)	The policy should make specific reference to “blue infrastructure i.e. watercourse networks (including rivers, streams, canals, ditches and drains)” throughout the borough.	An additional policy will be considered.
	SA scoping report	<p>Three specified documents are recommended to be added to the schedule of relevant plans, policies and programmes.</p> <p>The SFRA “could be considered to be out of date” and the EA “recommend that the document is reviewed and updated”.</p>	The Strategic Flood Risk assessment will be considered on a Greater Nottingham geography. The requested documents can be added.
English Heritage (now Historic England)	E24 Trees, hedgerows and Tree Preservation Orders	EH “consider that it would be helpful and NPPF compliant to retain a policy with regard to trees and hedgerows where they are important – for example where they play a positive contribution to the local character”. There is “scope for updating” to accord with the NPPF.	Will incorporate request in amended policy.
	S8 Shopfront design	EH consider that “continuing policy reference to shopfront design, security and signage is important for the new Local Plan, as it will form part of your positive strategy for the historic environment”; “these three	Will incorporate request in amended policy.

		policies could easily be amalgamated”.	
	S9 Security measures	EH consider that “continuing policy reference to shopfront design, security and signage is important for the new Local Plan, as it will form part of your positive strategy for the historic environment”; “these three policies could easily be amalgamated”.	Will incorporate request in amended policy.
	S10 Shopfront signage	EH consider that “continuing policy reference to shopfront design, security and signage is important for the new Local Plan, as it will form part of your positive strategy for the historic environment”; “these three policies could easily be amalgamated”.  With regard to signage, “amenity is a very important consideration, particular[ly] in those historic areas (such as conservation areas) and as such a policy reference is needed, and should not simply be deferred to the NPPF”. The PPG “states that in relation to amenity, this includes the local characteristics of the neighbourhood, citing that if the locality where the advertisement is to be displayed has important scenic, historic, architectural or cultural features consideration of whether it is in keeping with these features is required. A local plan policy on this would make this explicit for Broxtowe”.	Will incorporate request in amended policy.  Will incorporate request in amended policy.
	RC5 Protection of open spaces	“Open spaces can often form part of heritage assets – for example, non-designated historic parkland, cemeteries, important open spaces within Conservation Areas etc. Policy recognition should therefore include these matters and support the enhancement of such assets where relevant.”	Will incorporate request in amended policy.
	Possible new policy Design (p. 20)	EH “consider that there is a need for a locally distinctive design policy”. “This could set out design criteria in more detail and should make reference to local character and distinctiveness.” There should also be reference to “local materials”.	Will incorporate request in amended policy.
	Possible new policy Heritage assets / conservation	EH “consider that further detailed development management policies are essential”. “We consider that a lack of detailed development management policies relating to heritage would render the plan unsound.” They cite the ACS and NPPF in support of this view.  The PPS guide [to which we referred in the consultation document] “is to be replaced”, however the forthcoming new documents “are not a replacement for detailed Local Plan Policies and should not be used as	Will incorporate request in amended policy.

		<p>such”.</p> <p>Broxtowe “may wish to set out further and more detailed local information requirements for applications involving heritage assets”.</p> <p>A “local list, or a methodology relating to the identification of non-designated heritage assets could be developed”. A link to EH guidance on local listing is provided.</p> <p>Some fairly general comments are made about possible topics and format for policies.</p> <p>Historic environment considerations “should not be limited to a stand-alone chapter”.</p> <p>EH “are happy to comment on draft policies as they develop and provide further advice on any of the above”.</p>	
	Possible new policy Archaeology (p.25)	<p>EH “consider that reference is required within the Local Plan to this – this could be combined with a heritage asset policy, as above, or separated”.</p> <p>They “consider that there should be alignment with the City Council’s approach to archaeology”.</p>	Will incorporate request in amended policy.
	Possible new policy Boots / Severn Trent (p.39)	EH “consider that it is essential a policy to guide development for the strategic employment site at Boots is included within the Plan. A joint approach between your Authority and the City Council should also be pursued. As part of this, it is critical that reference is made within this to the protection of designated and non-designated assets to ensure the policy is sound”.	This may not be necessary as planning permission is ready to be granted subject to s106 issues with no objection from Historic England.
	Possible new policy Culture, tourism and sport (p.62)	It is “important” to have a policy on this issue, as “part of your positive strategy for the conservation and enhancement of the historic environment...further detail should relate to literary heritage etc.”	Noted.
	Possible new policy Cromford Canal (p. 63)	EH “would support the inclusion of such a policy”.	Noted.

	SA scoping report	<p>With regard to the inclusion of relevant plans, policies and programmes, “it does now cover the main documents”. The objectives of these documents, and their implications for the plan, “have been adequately identified”. The identification of key sustainability issues is now “adequate”, as are the SA objectives.</p> <p>Overall: “Although some further amendment is still required, we consider if this is made, the document does fulfil the legislative requirements”.</p> <p>However:</p> <ul style="list-style-type: none"> <li>• “The baseline data still requires data inputting in relation to statistics for heritage assets within England.”</li> <li>• “We are still very concerned that there is no discussion of the baseline data in chapter 4...there is no further discussion of the attributes for the area.”</li> <li>• “We are still unclear as to what the proposed indicators are actually measuring as they just list types of heritage asset.”</li> <li>• “There is no formal framework for assessment of site allocations...further detail is needed to ensure a robust process...for example, for site allocations, a more detailed framework is needed to understand how these will be assessed and how these will be ranked (colour coding? +/-?). For heritage assets, this will need an assessment of the significance of the heritage assets. Distance should not be used as a proxy to harm”.</li> </ul>	Noted and their requests will be incorporated in an amended SA.
The Coal Authority	Possible new policy Coal - Coal Mining Development Referral Area (p.25)	<p>The CA advises that this is now called ‘Development High Risk Area’.</p> <p>The CA “would welcome the inclusion of a new policy” on this subject. They “would recommend the inclusion of the spatial extent of the Development High Risk Area on a development constraints map if proposed for inclusion in the plan, or background text to a policy”. In accordance with the NPPG, “the LPA should require the submission of a Coal Mining Risk Assessment Report, or equivalent”.</p>	Will incorporate request in amended policy.
	Possible new policy Coal – Mineral	The CA “would also welcome the inclusion of a new policy which addresses the need to safeguard mineral resources...the obligation to	Will incorporate request in amended policy.

	Safeguarding Areas (p.24)	<p>prevent mineral sterilisation is also a district-level responsibility for the LPA in addition to the MPA. The LPA should liaise with the County Council as MPA on this topic”.</p> <p>“Reference should be made in the introductory section [of the part 2 plan] to all parts of the Development Plan for Broxtowe Borough, including the new Nottinghamshire Minerals Local Plan. It would also be helpful to explain in the introduction that the Minerals Plan will define Minerals Safeguarding Areas which, when adopted in due course, will also need to be illustrated on the Broxtowe Borough Council Proposals Map.”</p>	
	H1 New housing sites	“The Local Plan and/or the Sustainability Appraisal should include a site allocation selection methodology to identify what constraints and policy issues have been taken into account in the site assessment process.” This should include the issues of “mineral sterilisation and unstable land”. It is “necessary to include a criterion within the site allocation methodology which assesses the coal mining legacy GIS data that we provided”, and “an assessment should be made of the likely impact of the proposals on mineral resources”.	Mineral sterilisation issues will be taken into account in consultation with the County Council as the Minerals Planning Authority.
	EM1 New employment sites	“The Local Plan and/or the Sustainability Appraisal should include a site allocation selection methodology to identify what constraints and policy issues have been taken into account in the site assessment process.” This should include the issues of “mineral sterilisation and unstable land”. It is “necessary to include a criterion within the site allocation methodology which assesses the coal mining legacy GIS data that we provided”, and “an assessment should be made of the likely impact of the proposals on mineral resources”.	Mineral sterilisation issues will be taken into account in consultation with the County Council as the Minerals Planning Authority.
	SA scoping report	“Section 3 does not appear to make any reference to the new Nottinghamshire Minerals Local Plan or the relevant part of the NPPF. In addition, the [site allocation selection] methodology does not consider coal mining legacy hazards...these issues [minerals resources and unstable land] need to be fully addressed to render the Local Plan sound. The Coal Authority would not wish to need in due course to object to the site allocation methodology.”	Reference will be added.
Sport England	RC1 Leisure facilities	The forthcoming “Built Sports Facilities strategy” and Playing Pitch strategy should inform this policy.	The consultation document made clear that we will be

		<p>“The policies are currently being developed without the appropriate evidence base as required by paragraph 73 of NPPF. Paragraph 70 requires local authorities to plan positively, this cannot be achieved without the appropriate evidence in place.”</p>	<p>working with the Leisure Strategy, Green Spaces Strategy and Playing Pitch Strategy.</p> <p>These comments are relevant to all of Sport England’s representations.</p>
	RC5 Protection of open spaces	<p>“Does Policy RC5 protection of Open Space does this include playing field protection?”</p> <p>“The policies are currently being developed without the appropriate evidence base as required by paragraph 73 of NPPF. Paragraph 70 requires local authorities to plan positively, this cannot be achieved without the appropriate evidence in place.”</p>	The consultation document made clear that we will be working with the Leisure Strategy, Green Spaces Strategy and Playing Pitch Strategy.
	RC6 Open space: requirements for new developments	<p>“Sport England does not support the principle of standards for playing pitch provision but supports the principle of an evidence based action plan which secure the right facilities in the right place, by protection and or enhancement of existing facilities and the provision of new facilities if required. The Playing Pitch strategy will provide this evidence.”</p> <p>“The policies are currently being developed without the appropriate evidence base as required by paragraph 73 of NPPF. Paragraph 70 requires local authorities to plan positively, this cannot be achieved without the appropriate evidence in place.”</p>	The consultation document made clear that we will be working with the Leisure Strategy, Green Spaces Strategy and Playing Pitch Strategy.
	RC7 New playing fields	<p>The forthcoming Playing Pitch strategy should inform this policy – “how does the authority know that new playing fields are require?”</p> <p>“The policies are currently being developed without the appropriate evidence base as required by paragraph 73 of NPPF. Paragraph 70 requires local authorities to plan positively, this cannot be achieved without the appropriate evidence in place.”</p>	The consultation document made clear that we will be working with the Leisure Strategy, Green Spaces Strategy and Playing Pitch Strategy.
	RC17 Outdoor recreation pursuits	<p>“What evidence is available to inform the proposed policy RC17 Outdoor recreational Pursuits”</p>	The consultation document made clear that we will be working with the Leisure

		“The policies are currently being developed without the appropriate evidence base as required by paragraph 73 of NPPF. Paragraph 70 requires local authorities to plan positively, this cannot be achieved without the appropriate evidence in place.”	Strategy, Green Spaces Strategy and Playing Pitch Strategy.
Network Rail	Suggested additional policy Level crossings	“Development proposals’ affecting the safety of level crossings are an extremely important consideration for Network Rail and emerging planning policy to address...we request that the potential impacts from development effecting Network Rail’s level crossings are specifically addressed through Local Plan.” The policy should include references to: Broxtowe’s statutory responsibility to consult the statutory rail undertaker on relevant applications; the facts that Network Rail seek to close Level Crossings where possible, and resist new ones; a requirement for a Transport Assessment for any application that “may increase the level of pedestrian and/or vehicular usage at a level crossing”; a requirement for the developer to fund any necessary improvements to the crossing. Broxtowe is “urged” to adopt a similar policy to an example given from Doncaster.	The issue of level crossings will be considered.
HS2	n/a	“HS2 has no specific comments on the Development Management Policies Issues and Options Consultation at this time.”	Noted and points will be considered.
The Theatres Trust	Possible new policy Culture, tourism and sport (p.62)	A policy is “required”, in order to “resist the loss of cultural facilities”, support ACS policy 13 and “reflect” NPPF paragraph 70. The policy should safeguard existing facilities, require developer contributions and encourage the provision of new facilities.	An additional policy will be considered
NFU	E8 Green Belt	This policy should be included in the Local Plan with amendments. “We would like Policy E8 to include wording to promote rural diversification as suggested in the Additional Issues column”.	Will incorporate request in amended policy.
	E13 Prominent Areas for Special Protection	This policy should not be included in the Local Plan. These areas are “yet another no-go area for development. The NPPF is against the designation of yet more areas where development is not permitted and this particular designation is more of the same”.	Noted. However the policy performs a useful function in steering built development away from prominent areas (such as Bramcote Hills Golf Course).
	E14 Mature Landscape Areas	This policy should not be included in the Local Plan. “Mature Landscape Areas should not be allowed to [be?] a large area where only limited development is allowed. Do these areas really require protection additional to that in the rest of the plan?”	Noted. However the policy may still be useful if it makes clear that such a designation does not amount to a blanket

			development exclusion zone.
	E16 Sites of Importance for Nature Conservation	This policy should not be included in the Local Plan with amendments. "We would not like to see policy E16 extended to include Nature Improvement Areas which could be very large areas where development of any kind is strictly controlled."	Noted. However the policy may still be useful if it makes clear that such a designation does not amount to a blanket development exclusion zone.
	E33 Light pollution	This policy should not be included in the Local Plan with amendments. "Mention is made of protecting "intrinsically dark landscapes" too. Another designation which will allow development to be refused over a large area and therefore a policy addition to be fought against."	Noted. However the policy may still be useful if it makes clear that such a designation does not amount to a blanket development exclusion zone.
	Possible new policy Reducing CO2 emissions (p.18)	"It needs to encourage renewable energy developments in certain areas, as per the NPPF."	Noted. Areas which may be suitable for unobtrusive renewable energy installation are on previously developed land.
	Possible new policy Landscape (p.23)	"Any policy to protect large new areas of the countryside must ensure that not all development is prevented, but there are allowances for farm and rural diversification, farm buildings and new housing on farms."	Noted. However the policy may still be useful if it makes clear that such a designation does not amount to a blanket development exclusion zone.
Mobile Operators Association	E35 Telecommunications	It is "important" that there is a specific telecommunications policy. Detailed wording is proposed for the policy and supporting text. The policy should have criteria about "seeking to minimise" adverse impacts through siting and design, "exploring the possibility" of using existing buildings and structures, and avoiding "unacceptable effects" on "sensitive areas". The supporting text should state that "the authority is keen to facilitate" the expansion of telecommunications infrastructure.	Noted and points will be considered.
<b>Duty to Cooperate – Local Authorities</b>			
Nottinghamshire County Council (strategic planning)	Possible new policy Coal – Mineral Safeguarding Areas	"The County Council welcomes the inclusion of a policy on minerals safeguarding. In order to maintain consistency with the emerging Minerals Local Plan, account should be taken of policy DM13 'Mineral safeguarding and consultation areas' and any subsequent amendments as the Minerals Plan progresses."	Noted. As the Coal Authority requests, a policy can be included, albeit care will need to be taken as Broxtowe is not the Minerals Planning Authority, Nottinghamshire

		<p>“It is also important to note that Para 143 point 3 of the NPPF states that as well as defining Minerals Safeguarding Areas, Minerals Consultation Areas (based on the Minerals Safeguarding Areas) should be included.”</p> <p>It is also worth noting that a sand and gravel safeguarding area exists in the south of the district which you may wish to consider.”</p>	County Council is.
H6 Density of housing development		“The County Council recommends that reference to public transport accessibility appraisal mechanisms is essential for sustainable developments, and to ensure the long term viability of a development in terms of public transport provision”	Noted. This relates to a requirement for high densities that may not be viable or appropriate in all locations.
T1 Developers’ contributions to integrated transport measures		“Any new approach should ensure that public transport provision is prioritised as part of any future policy development.”	This may be problematic in relation to s106 ‘pooling restrictions’.
T4 Park-and-ride facilities		“The Council isn’t currently considering any future Park & Ride developments in Broxtowe.”	Noted and points will be considered.
T5 South Notts Rail Network (SNRN)		The policy is listed in a schedule of comments; however no comments on this policy are actually made.	
T6 Nottingham Express Transit (NET)		The policy is listed in a schedule of comments; however no comments on this policy are actually made.	
T12 Facilities for people with limited mobility		“It is important that the [County] Council can negotiate with developers for contributions to include such facilities as part of developments i.e. raised kerbs, audio and visual information. The Council requests the inclusion and retention of Policy T12.”	This may be problematic in relation to s106 ‘pooling restrictions’.
Possible new policy Sustainable transport networks (p.45)		“Any single policy should include reference to the role of accessible public transport networks as part of a sustainable transport framework.”	Noted and points will be considered.
Possible new policy Travel plans (p.45)		“The inclusion of a local policy setting out what is considered to be “significant” is supported.”	Noted and points will be considered.
E16		The policy “should certainly be retained, or incorporated into a ‘natural	Will incorporate request in

	Sites of Importance for Nature Conservation	environment policy (see below)."	amended policy.
	Possible new policy Green infrastructure	"A policy relating to the natural environment (i.e. beyond just locally designated sites) [and so presumably potentially part of a new GI policy] is also required, which could incorporate policy E16, above." In addition, the policy would need to : ensure that impacts on biodiversity are minimised; contribute to the establishment of coherent ecological networks; set criteria against which proposals affecting designated wildlife sites will be judged; plan positively for networks of biodiversity and GI; plan for biodiversity at a landscape scale across local authority boundaries; identify and map components of ecological networks; promote the preservation, restoration and re-creation of priority habitats; promote the recovery of populations of priority species; identify suitable monitoring indicators; prevent harm to geological conservation interests; and "make provision for an Nature Improvement Areas which may be identified in the plan area in the future".	Will incorporate request in amended policy.
	H5 Affordable housing	"The County Council welcome the issue of whether a consistent Borough Wide approach is appropriate, this will help when considering viability issues/priorities relating to the delivery of new housing sites."	Noted and points will be considered.
	EM1 New employment sites and/or RC2 and RC3 Community and education facilities	"Paragraph 3.4.21 (p38) the County Council welcome the plans for "specific provision" for education which is also supported in Policy RC2 and RC3 (p55-56). Where 'Reference to particular sites will need updating' is included. The Capacity of schools sites to allow for further expansion is an issue that is changing over the duration of the plan period."	Paragraph 3.4.21 of the Aligned Core Strategy, which is referred to on page 38 of our consultation document with regard to policy EM1, is about the 'knowledge based economy'; unclear what "specific provision" is referring to; and unclear as to the perceived relationship between employment and education policies. Further discussions will be held with Nottinghamshire County Council.

Nottinghamshire County Council (property department)	RC5 Protection of open spaces	The policy does “not provide an adequate framework, standards or criteria for an objective determination of the role and value of open spaces in new development...There needs to be a very clear relationship between the demographic projections of the local areas and the open spaces required – a PPG 17 type study which is only partly reported in the Council’s Green Spaces Strategy 2009-16.”	This will be addressed in the Council’s Playing Pitch Strategy and Green Infrastructure work, both of which will be concluded to inform this Local Plan.
	RC6 Open space: requirements for new developments	The policy does “not provide an adequate framework, standards or criteria for an objective determination of the role and value of open spaces in new development...There needs to be a very clear relationship between the demographic projections of the local areas and the open spaces required – a PPG 17 type study which is only partly reported in the Council’s Green Spaces Strategy 2009-16.”	This will be addressed in the Council’s Playing Pitch Strategy and Green Infrastructure work, both of which will be concluded to inform this Local Plan.
<b>Local Interest Groups</b>			
Beeston and District Civic Society	E8 Development in the Green Belt	The policy should be included in the Local Plan as it is. (No further comments are made.)	Noted and points will be considered.
	E13 Prominent Areas for Special Protection	The policy should be included in the Local Plan as it is. (No further comments are made.)	Noted and points will be considered.
	H4 Subdivision or adaptation of existing buildings	The policy should be included in the Local Plan as it is. (No further comments are made.)	Noted and points will be considered.
	H6 Density of housing development	The policy should be included in the Local Plan as it is. (No further comments are made.)	Noted and points will be considered.
	H7 Land not allocated for housing purposes	The policy should be included in the Local Plan as it is. (No further comments are made.)	Noted and points will be considered.
	H12 Loss of residential accommodation	The policy should be included in the Local Plan as it is. (No further comments are made.)	Noted and points will be considered.
	S2 Sites for retail and associated	The policy should be included in the Local Plan as it is. (No further comments are made.)	Noted and points will be considered.

	development		
	S4 Prime shopping frontages	The policy should be included in the Local Plan as it is. (No further comments are made.)	Noted and points will be considered.
	S5 Local shopping development	The policy should be included in the Local Plan as it is. (No further comments are made.)	Noted and points will be considered.
	S8 Shopfront design	The policy should be included in the Local Plan as it is. (No further comments are made.)	Noted and points will be considered.
	S10 Shopfront signage	The policy should be included in the Local Plan as it is. (No further comments are made.)	Noted and points will be considered.
	Possible new policy Design (p.20)	<p>The Society “agree that any new policies should include references to standards of amenity of occupiers, energy efficiency, emissions etc.</p> <p>There should be both a supplementary urban design guide, and a residential one, possibly also a design guide for conservation area development. Guidance needs strengthening from current.</p> <p>Such policies are also relevant to proposed new housing policies.”</p>	Noted and points will be considered. Conservation area appraisals will assist with this.
	Possible new policy Heritage assets / conservation (p. 22)	<p>“Referring to non designated heritage assets – a local list should be seen as a necessary planning tool and should be extended, with more of a local dimension, and should be available on line... Broxtowe’s list is in serious need of updating and should be expanded to include assets outside Conservation Areas. It should also recognise that assets need not necessarily be buildings.”</p> <p>Any policy “should delineate criteria for inclusion [in the local list] (see Erewash, Rushcliffe and Bassetlaw)”.</p>	Noted and points will be considered.
Nottingham CPRE	Possible new policy Travel Plans (p.45)	<p>The CPRE “understand that national guidance on Travel Plans specifies 80 dwellings as the threshold from which an applicant would be required to develop a Travel Plan...the principle of following national guidance – as a minimum – should be incorporated into Broxtowe’s Local Plan Part 2.”</p> <p>“Integrated Travel Plans should be developed for each allocation in its entirety even if actual development occurs in phases or via a number</p>	Noted and points will be considered.

		<p>of planning applications.”</p> <p>“Funding for the elements of the travel Plan should be secured from developers – where necessary drawing their attention to the cumulative impact.”</p>	
Land Owners / Developers			
Bartons plc	EM1f New employment sites: former Bartons bus depot	“EM1f should not be included in the Local Plan.” (No further comments are made.)	Noted and points will be considered. If an application is submitted and approved on this site it will remove the need for a site specific policy.
The British Land Company plc	E24 Trees, hedgerows and Tree Preservation Orders	<p>The current policy wording is “too restrictive”.</p> <p>‘Important’ trees should be defined as those which are subject to a Tree Preservation Order. ‘Important’ hedgerows should be defined according to the 1997 Hedgerow Regulations. Reference to both of these definitions “should be made explicit in any future policy wording to ensure transparency”.</p> <p>Policy wording “should allow developers to provide mitigation and/or compensation where adverse impacts are unavoidable”.</p> <p>“The policy should read [presumably in part – see above]: “development that would adversely affect important trees and hedgerows will be permitted where such adverse affect is adequately mitigated or compensated.”</p>	Noted and points will be considered.
	E26 Pollution	<p>“The policy should clarify when an Air Quality Assessment will be required.”</p> <p>“The policy must explicitly make clear the definition of ‘significant deterioration of air quality’ and ‘significant loss of health or amenity’. In addition, the policy should clarify further the extent of ‘nearby premises’ to enable developers to understand the physical coverage any future assessments may have to cover.”</p>	Noted and points will be considered.
	T11 Guidance for	“The Council’s Parking Standards should be expressed as maxima and be applied flexibly”.	Noted and points will be considered.

	parking provision	<p>“In the context of shopping parks, parking assessments should not singularly and stringently deem that an increase/decrease in gross floorspace alone will increase demand for car parking facilities. Future policy wording should give due considerations to variations in peak demand during the day/week, particularly at mixed use sites. In certain instances, this will remove the need to increase car parking capacity where such peaks complement each other.</p> <p>Accordingly, reference in the policy to “...unless appropriate provision is made for vehicle parking...” should be changed to “...unless appropriate provision is available for vehicle parking...”.”</p>	
	S1 Shopping and associated uses in town centres	<p>Terminology requires updating to reflect ACS policy.</p> <p>“The town/district centre boundaries of the four centres should be reviewed. As part of this review it may be sensible to contract the defined boundary of particular centres so that they encompass areas well connected to the core of the centre with reasonably high footfall and units capable of accommodating modern retail operations. This would assist in concentrating commercial development and thus add to the viability of those centres. It would also help focus future investment.”</p> <p>In Eastwood, “the area between Church Street and Devonshire Drive (including the former Eastwood Infant and Junior School) is not considered to form part of the town centre in terms in any commercial sense and therefore should be removed...Furthermore, while the Morrisons supermarket at the western extremity of the centre clearly performs a role in attracting custom to the centre, much of the area between the supermarket and the ‘main run’ of Nottingham Road adds little to the practical function of the centre.”</p> <p>In Kimberley, re-evaluation is required in particular for “the southern reaches of James Street and the western end of Main Street which offer limited and sporadic main town centre uses in between predominantly residential dwellings.”</p>	The updated retail study undertaken by Carter Jonas will be important evidence to consider these issues. This was not available at the time this consultation was undertaken.

		<p>“The justification [in the ACS] supporting the view that Eastwood District centre is weak in retail terms and the need of enhancement is questioned...WYG have undertaken numerous health check surveys at Eastwood in past years”; figures are provided for 2012 and 2014 “which highlight that the district centre is performing broadly in line with the national average...the centre is certainly not underperforming...the opportunity should be taken to correct this assertion in the emerging DPD. In the absence of this the Council should justify and evidence this statement and clarify in what way the centre is considered to be underperforming and what action is required to correct that underperformance.”</p>	
	<p>S2 Sites for retail and associated development</p>	<p>“Any future policy should maintain the preference in favour of retail and leisure development to be developed at Giltbrook Shopping Park in absence of preferable district centre sites.”</p> <p>“As demonstrated by numerous extensions and remodelling of the shopping park since the opening in 2008, the park represents a sustainable location for new retail and leisure development”.</p> <p>“We do not consider a criteria based policy to be appropriate as this would limit the ability of the authority to suitably respond to the needs of national retailers and changes to the local economy in Broxtowe.”</p> <p>“Furthermore, we do not consider there to be a need to limit the overall floorspace permitted at the shopping park.”</p>	<p>The updated retail study undertaken by Carter Jonas will be important evidence to consider these issues. This was not available at the time this consultation was undertaken.</p>
	<p>S3 Retail and associated development in locations outside town centres</p>	<p>The policy wording is inconsistent with the NPPF; “for example”, ‘need’ is no longer an NPPF requirement and the policy “refers to ‘convenient walking distance’ in respect of edge of centre sites rather than giving preference to accessible sites when considering edge and out of centre locations”. Part (b) of the policy does not relate well to policy S2(c).</p> <p>“We consider it prudent to continue to give preference to Giltbrook Shopping Park as the appropriate location for retail provision in the absence of sequentially preferable sites in Eastwood and Kimberley”.</p>	<p>The updated retail study undertaken by Carter Jonas will be important evidence to consider these issues. This was not available at the time this consultation was undertaken. In addition the recommendation in the retail study is that a floor space threshold of 500 sqm is</p>

		<p>“There currently exists no quantitative evidence in support of a 1,000 sqm locally set floorspace threshold for the assessment of impact...Lack of evidence means the LPA should revert to the default position of 2,500 sqm, as set out in the NPPF”.</p> <p>“The definition of edge of centre is clearly defined in the NPPF glossary and therefore the LPA should not look to repeat national policy.”</p>	appropriate for the assessment of impact.
	<p>S7 Food and drink retailing outside town centres</p>	<p>“Any revised policy should continue to focus purely on the three aspects of environment, traffic and residential amenity, with the absence of ‘harm’ in regard these elements indicating acceptability.” The policy “should not seek to impose inflexible thresholds” with regard to ‘harm’.</p> <p>“The suggested policy distinction between groups of shops and stand alone units would be misconceived.”</p> <p>Changes to the Use Classes Order will need to be recognised.</p> <p>“Monitoring of the overlap between the food and drink A class uses can be dealt with by way of condition on a case by case basis and should not be included within this policy.”</p>	Noted and points will be considered.
	<p>S10 Shopfront signage</p>	<p>“This policy is not required”, given the provisions of the 1990 Act.</p>	Noted and points will be considered.
	<p>Possible new policy Flood risk – sequential and exception tests (p.17 and appendix B)</p>	<p>“Greater clarity is required...policy wording should clearly state that minor development falls outside of the requirements of the sequential and exception tests. It should also clearly state that extensions or internal alterations to existing premises do not have to comply with the sequential test, regardless of the quantum of floorspace being created.”</p> <p>Given that shops and leisure are considered as ‘less vulnerable’ developments, “policy wording should ensure Flood Risk Assessments (FRAs) are not unnecessarily undertaken in instances where they are</p>	Noted and points will be considered.

		not required”.	
Possible new policy Reducing CO2 emissions (p.18)	“A standalone policy within the emerging DPD is not required” because ACS policy 1 “provides sufficient advice”.  “We do not consider a ‘Merton’ policy...is appropriate or necessary.”  “Policies should not form a tool to define, control and enforce energy generation on-site. Such policies pose significant difficulties in respect of monitoring implementation and compliance at the operational stage.”		Noted and points will be considered.
Possible new policy Design (p. 20)	ACS policy 10 “provides a sufficiently detailed design policy in its own right”, so a new policy “is likely to result in unnecessary duplication”.  “A Broxtowe specific design guide is considered to form a better approach for the delivery of good design.”		Noted and points will be considered.
Possible new policy Landscape (p. 23)	“Any new policy should clearly define the meaning of ‘valued landscape’ in the Broxtowe context...The policy should be clearly worded to only relate to these valued landscapes in order to avoid becoming an unnecessary and unjustified burden on development elsewhere.”		Noted and points will be considered. This policy will be informed by more detailed landscape character assessment.
Possible new policy Green infrastructure (p.24)	“Any future policy should provide a clear green infrastructure hierarchy, set in line with the Council’s emerging Green Infrastructure Strategy. The hierarchy should avoid the unnecessary allocation of unimportant peripheral areas of green space”.		Noted and points will be considered.
Possible new policy Existing employment sites (p.40)	“A new policy which considers the release of poor quality employment land for other economic uses which secure the creation of jobs, economic growth and enables new investment would be appropriate.”  The policy “should include criteria recognising the importance of job creation rather than simply limiting development to the ‘B’ use class.”		Noted and points will be considered.
Possible new policy Travel Plans (p. 45)	The policy is “unnecessary due to the guidance provided in PPG (paragraph 009)”. Any requirement for a Travel Plan “should be based on the merits and travel benefits/impact of the development proposals and not on arbitrary thresholds set by the LPA”.		Noted and points will be considered.
Possible new policy Eastwood and Stapleford district	“We do not consider that this policy is required.”  “Informal planning guidance would be a more appropriate means of		Noted and points will be considered. The updated retail study undertaken by

	centres (p.54)	<p>dealing with targeted regeneration”, although “We do not consider that the centre is performing poorly”.</p> <p>“Our town centre health checks have confirmed that Eastwood District Centre has not demonstrated a decline in its vitality and viability since the opening of the Giltbrook Retail Park in 2008, therefore indicating no correlation between the operation of the retail park and the health of the centre. Eastwood district centre functions in a wholly different retail market to the retail park with no material crossover in likely tenant requirements. We do not agree, therefore, with the suggestion in the Issues and Option paper that the future approach to the Shopping Park is likely to be relevant to this potential new policy.”</p>	Carter Jonas will be important evidence to consider these issues. This was not available at the time this consultation was undertaken.
	Possible new policy Infrastructure, planning obligations and developer contributions (p.63)	<p>“We question whether there is a need for this policy”; a policy would be “a particularly inflexible tool” and “a Supplementary Planning Document (SPD) would provide a more flexible approach”.</p> <p>The LPA “should progress a CIL charge promptly to allow any future planning obligations policy/SPD to be fully informed and tested alongside the infrastructure and affordable housing viability evidence”.</p> <p>“Any future obligations policy or SPD should specifically reflect a flexible approach to s106 negotiations, particularly where a developer can demonstrate abnormal development costs.”</p>	Noted and points will be considered.
The Mitchell Trust	E12 Protected Open Areas	<p>The policy should be retained, however boundaries of the Areas, and particularly the one at Beeston Fields Golf Course, should be reviewed.</p> <p>Two areas are proposed to be removed from the Protected Open Area at the golf course: one to the south of Beeston Fields Drive and one to the north of Bramcote Drive (details are provided). Removal of these areas “would have no material impact on the role of the Golf Course in providing a clear, physical break between Beeston Fields to the north and residential areas to the south...There would remain a substantial area of Golf Course, with its many mature trees, between the two proposed deleted areas in order to ensure this area continues to function as an effective break within the built-up area”.</p>	Noted and points will be considered. This policy will not be able to be amended prior to the determination of their Planning application which is likely to be before the end of 2015.

		<p>The Trust “would not support” an approach of including the Protected Open Areas in a more all-embracing policy that could relate to ‘Local Green Space’.</p> <p>It would be “highly inappropriate” to designate the golf course as a ‘Local Green Space’ as it would not meet the NPPF criteria for designation:</p> <ul style="list-style-type: none"> <li>• It is not “in close proximity to the community it serves, because “the golf course does not serve a close and defined geographical community; it serves a golfing community and patrons travel to the course from a dispersed set of geographical communities”;</li> <li>• It is not “demonstrably special to a local community” because “the golf course does not hold any particular significance”;</li> <li>• It is “an extensive tract of land” and is “far in excess of what could reasonably be acknowledged” as being “local in character”.</li> </ul>	
Bloor Homes W Westerman Ltd	E12 Protected Open Areas	Any proposal to designate Protected Open Areas as ‘Local Green Space’ “would need to be based on a robust and transparent assessment of any candidate areas against the criteria in paragraph 77 of the NPPF” and “must be taken in the context of the wider development land supply, and an understanding of other potential sources of development land”.	Noted and points will be considered.
	E13 Prominent Areas for Special Protection	Any proposal to designate Prominent Areas for Special Protection as ‘Local Green Space’ “would need to be based on a robust and transparent assessment of any candidate areas against the criteria in paragraph 77 of the NPPF” and “must be taken in the context of the wider development land supply, and an understanding of other potential sources of development land”.	Noted and points will be considered.
	E14 Mature Landscape Areas	“The purpose and objectives of this category of protected land is unclear, and should be revisited, particularly in the context of Green Belt policy which also relates to all of the existing Mature Landscape Areas. Removing this policy altogether would not make these areas any more vulnerable to development, or increase the potential for them to be lost.”	Noted and points will be considered.

Possible new policy Reducing CO2 emissions (p.18)	<p>“There is clear potential for either duplication or inconsistency” with national building regulations.</p> <p>“The policy title proposed suggests a more generic ‘low carbon’ policy [rather than a focus on decentralised energy] which would be very likely to add little to the national regime of regulations and best practice. However, if the Council opts for a specific and prescriptive ‘decentralised energy’ policy focus there are risks that it would quickly be out of date as technology changes and experience of implementation evolves. It is important to guard against introducing a policy in a long-term planning document which constrains innovation and responses to new technology, or which fails to keep pace with changing national policy and regulations.”</p> <p>“In addition there is a need to consider overlaps (and potential tensions) with any design related policies”.</p>	Noted and points will be considered.
Possible new policy Flood risk – sequential and exception tests (p.17)	From the evidence provided, it is not clear whether local policy on this issue would be necessary, and to what extent it would repeat national policy.	Noted and points will be considered. A new policy is considered necessary to properly take into account the Left Bank flood defences.
Possible new policy Flood risk – Sustainable Drainage Systems (SuDS) (p.18)	<p>From the evidence provided, it is not clear whether local policy on this issue would be necessary, and to what extent it would repeat national policy.</p> <p>There is a “lack of clear context for any local policy on SuDS”.</p>	Noted and points will be considered.
Possible new policy Design (p. 20)	“The key criteria is the clarity of any policy guidance given, whether in one or numerous policies. However... imposing fixed minimum (or maximum) densities is not considered necessary or helpful. A highly prescriptive design policy does not enable developers to respond to the opportunities or constraints offered by individual sites”.	Noted and points will be considered.
H5 Affordable housing	<p>The approach “should be suitably flexible to reflect the often diverse range of outcomes expected from the development process”.</p> <p>The possible new policy on ‘Infrastructure, planning obligations and developer contributions’ “could provide an opportunity to be clear about</p>	Noted and points will be considered. The plan wide viability evidence will help to inform this policy.

		the relative priorities” in this regard.	
	Possible new policy Housing size/mix/choice (p. 34)	“Without care, such a new policy could inadvertently lead to homogenous developments dominated by a very narrow range of house types”; “being overly prescriptive about housing design issues is likely to restrict flexibility, and could be counter-productive in terms of the quality of development outcomes”. “It is unclear whether there is very much that any new policy could say that is not already covered by ACS Policy 8.”	Noted and points will be considered.
	Possible new policy Custom build / ‘Self-build’ (p.36)	This area “might be included within a policy regarding housing mix and choice. The potential for custom or self-build to form part of affordable housing provision should be considered”.	Noted and points will be considered.
	EM1 New employment sites	<p>“Policy does not necessarily need to take a consistent approach to the definition of use-classes on specific sites, and an overly restrictive approach to specific land-uses on specific sites would be contrary to the NPPF guidance”.</p> <p>Policy “should not be solely focussed on B-Class Uses, and policies need to be flexible enough to respond to needs as they arise”.</p> <p>“One way to deliver this flexibility is to plan to exceed the land required as indicated by any forecasts of need, and ensure a portfolio of existing and new sites are available for a range of B-Class and other employment generating uses”.</p> <p>There should also be “criteria based policies for the identification and development of new employment sites”.</p>	Noted and points will be considered. The updated employment needs study by Nathaniel Litchfield and Partners will be important evidence to inform this issue.
	Possible new policy HS2/Toton Strategic Location for Growth (p.40)	<p>“A new policy focussed on the location for growth at Toton is essential” It “should include detailed site boundaries and formally allocate a site for development”.</p> <p>There should be “the preparation of an extensive evidence base so that decisions about scale, form, Green Belt boundaries etc, can be undertaken based on sound evidence”.</p> <p>“The minimum requirements of the ACS policies fall someway short of the policy response needed to the opportunities offered by HS2.” For</p>	Noted and points will be considered. This work is progressing on a local, housing market area, and regional scale.

		example, it is stated that the indicated minimum employment floorspace at Toton is similar to the amount envisaged by an emerging neighbourhood plan for Keyworth village in Rushcliffe.	
	'General comment'	"The approach taken in the Issues and Options document to Agricultural Land should be taken throughout – before any assumptions are taken about which policies are to be included, consideration should be given to whether or not a local policy could usefully add anything to the NPPF. Based on the Issues and Options document, it is not clear whether this question has yet been applied widely."	Noted and points will be considered.
<b>Town/Parish Council</b>			
Greasley Parish Council	E14 Mature Landscape Areas	"There is a need to consider the formal designation of additional areas of Mature Landscape and review any areas already designated.	Noted and points will be considered.
Supported by Mr Robert and Mrs Barbara Willimott	H5 Affordable Housing	"There is a need for new policies that take account of need and supply across the borough."  "Meeting Local housing need in small settlements such as Moorgreen are an important aspect of affordable housing...Greasley Parish Council is well placed to identify such local needs in the context of a Neighbourhood Plan...There is a need to consider how an appropriate balance can be struck between meeting affordable housing needs and satisfying other planning objectives such as open space provision, good design and road safety."	Noted and points will be considered. A neighbourhood plan would be a good means of addressing this issue.
	Possible new policy Design (p.20)	There should be a "local dimension" and "imaginative implementation" of policies. There should be a requirement for "thorough consultation both by developers with members of the public at the pre-application stage and with the Parish Council as statutory consultees."	Noted and points will be considered.
	Possible new policy Landscape (p.23)	Consideration should be given to "whether the high quality of the landscape in the wider area around Kimberley and Eastwood, which has important historical associations as well as landscape value, should be given some form of designation...the value of landscapes to the local community is important".	Noted. Landscape assessment will investigate the quality of the landscape which will in turn form part of the evidence base for future policies.
	Suggested additional policy	There should be a policy on change of use from employment to residential. No details are given. (However it is noted: "it does seem	Noted. Amendments to Permitted Development allow

	Change of use from employment to residential	that the number of jobs provided in industrial land and buildings is falling whilst other locations such as recreational and retail centres and working from home are increasing in importance”).)	some changes of use without the need for planning permission and so a policy may not be necessary.
	General and other points	<p>There is an “urgent”, “priority” need to review policies relating to employment land, design, housing, recreation and traffic/transport. “This should be done in full consultation with Greasley Parish Council and should be preceded by an “effectiveness review” of existing policies, in full consultation with key “users” such as the parish council and local schools.”</p> <p>The “effectiveness review” should involve analysis of “the reasons why a policy has not been the subject of an appeal” and “a statement of the main successes and failures attributable to each policy”.</p> <p>The consultation document was “a very difficult document to respond to”, partly because it didn’t reproduce the wording of the policies concerned or summarise the relevant ACS policies. The document is “obscure, lacks real depth and is not sufficiently transparent” to encourage public participation.</p> <p>Supplementary Planning Guidance did not get sufficient attention in the consultation and should be looked at again; they “can have an important role in development control”.</p> <p>Greasley “welcome the references in the consultation document on Local Greenspace but there should be more emphasis on the role of the local community where appropriate through a Neighbourhood Plan.”</p> <p>Reference is made to previous comments in the 2013/14 consultation on traffic and transport issues, which are still considered to be relevant. Issues include Nuthall Island, Junction 26, Giltbrook and the A610 Eastwood to Nottingham corridor.</p> <p>Reference is also made to previous comments on flood risk issues</p>	Noted and points will be considered. A neighbourhood plan would be a good way of addressing several of the issues raised.

		<p>regarding sites north of Eastwood and west of Kimberley, and to more recent issues at Thorn Drive, Newthorpe and Mansfield Road, Eastwood. The Council considers that “it would be unforgiveable to allow similar situations [to Thorn Drive] to be created elsewhere”.</p> <p>“As a matter of principle there should be a clear dividing line between planning policy and other strategic documents and members of the public should have a role in the production of these other strategies at least equal to their rights within the planning system...and the Council’s Capital Programme is a key vehicle which should be subject to full public participation.”</p> <p>“There is also a need for some strategy as to how to spend the additional resources in the form of the new homes bonus. Government policy is that part of these receipts are ring fenced to the locality in which they arise and the local community have a key role in deciding how the additional resources are spent.”</p>	
<b>Public</b>			
Mr Philip Jones	E13 Prominent Areas for Special Protection	The policy should be included in the Local Plan as it is. “Cannot see any reason why a change need be made.”	Noted and points will be considered.
	SA Scoping Report	Qs 8a and 9a: “yes”.	
Mr Clive Narainen	E33 Light pollution	This policy should be included in the Local Plan with amendments. Reference should be added to “good design, protecting “intrinsically dark landscapes””.	Noted and points will be considered.
	SA Scoping report	Qs 8a, 9a, 10a, 11a, 13a, 14a, 15a: “yes”. Q 12a: “no”.	
Ms Andrea Oates	H9 Domestic extensions	A residential design guidance leaflet, similar to that produced by Chelmsford Borough Council, “could well be helpful”.	Noted and points will be considered.
Mr Richard Maher	Suggested additional policy Diversion or extinguishment of rights of way	There should be a policy on “Diversion or extinguishment of rights of way that pass within gardens, farmyards and commercial premises of existing or proposed development”. The policy should be worded so as to comply with draft DEFRA guidance. “There should be a presumption that PRoW do not pass within the curtilage of gardens, farmyards and commercial premises.” “Where errors have occurred in the planning	Not a Borough Council Issue: Public Rights of Way fall under the remit of the County Council.

		process with existing properties it shall be incumbent on the relevant planning authority to divert or extinguish such intrusive PRow.”	
Mr Philip Sugden	Other points	<p>Broxtowe’s attention needs to be drawn to “the Nottinghamshire County Council’s circular” with reference to “Nottinghamshire County Council taking over control of all Councils, Parishes etc”, “thus saving money, reducing Council Taxes”.</p> <p>The development management policies and site allocations need to be “considered in conjunction with Sir Michael Lyons Executive Summary” entitled “Place-shaping, a shared ambition for the future of local government”.</p>	Noted and points will be considered.
Mr Vincent Corcoran	SA Scoping Report	Q 9a: “no”. “There is a very strong feeling from NG16 residents that Broxtowe Borough Council are in bed with the Developers to build on GREEN BELT LAND...as a first option! The well attended meeting at Greasley Parish on 19/03/2015 indicated to me that the NG16 residents and the Greasley Parish Council are up for the fight to stop this development.”	Policy 3 of the ACS gives priority to development within existing settlements and land outside of the Green Belt.
Mr Andrew Hallsworth	SA Scoping Report	<p>Qs 8a, 9a, 10a, 11a, 12a, 13a, 14a, 15a: “no”.</p> <p>Qs 8b, 9b, 10b, 11b, 13b, 14b, 15b: “This form is ridiculous for members of the public to object about protecting the countryside.”</p>	

## Note:

The format of the table has been amended (section headings, colour, order etc) so that it roughly matches the table used in the Toton Advisory Committee report (as requested). There are a few minor points that may want brief consideration before the tables are finalised for publication:

- For now I've left it in landscape rather than portrait format, as it seems to read a bit easier for the DM policies.
- The Toton report uses subheadings within the 'comment' column to separate out different topics – for the DM policies it seems a bit clearer to have a column for policy number/description.
- So far I haven't edited down the content from the first version – they're not directly comparable, but there seems to be a similar level of detail in both the Toton table and this one.
- There is the question of what the order of consultees should be within each group – maybe alphabetical? (So far I've left it fairly random, except with arguably the more important ones coming first.)
- There's also the question of the order of policies within each consultee's section – it could be by topic, with existing policies followed by proposed ones, or all existing policies could come first, followed by all proposed ones. (So far again I've left it fairly random, generally in the order they came in the submissions.)
- And the question of the order of the groups of consultees – this table uses the order from the Toton report (except as mentioned below) – however if it's intended to reflect order of importance, it may be debatable whether landowners/developers should come before town/parish councils.
- There are two sections on local interest groups in the Toton report – I'm not sure of the significance, so for now there is just one in this table, after 'duty to cooperate – local authorities'.
- Maybe 'duty to cooperate – local authorities' could just be 'local authorities'?
- Is 'national interest groups' the best term for NE, EA, HE etc? Possibly this could be 'statutory consultees' (although this may be inappropriate jargon) or similar, in which case 'national interest groups' might be used for the Mobile Operators Association, Theatres Trust etc?
- Bartons are currently in the 'landowners/developers' section – they could instead go in an additional separate 'local business' section (as in the Toton report).
- The same could perhaps apply to the Mitchell Trust (owners of Beeston Fields golf course).
- I've kept Bloor's and Westerman's comments separate for now, although they're identical – the Toton report sensibly groups them together – although that perhaps raises the question of whether other similar comments should be grouped together.
- The 'public' section may well want editing down – all but two or three of them could legitimately be excluded, as people have just used the forms inappropriately to make comments about other issues.
- I've deleted consultee ID numbers, to match the Toton report – so far I've left in references to page numbers in the consultation document – this makes it easier to refer back, but perhaps it's too much detail for the published report.
- There seems to be a need for a minor formatting adjustment, as the last line of the first page doesn't print.
- n.b. additionally or alternatively we might want to group all the responses together by policy rather than by respondent.

## GB Review Summary

### Foreword:

Many comments submitted in response to this Green Belt review relate to non-Green Belt issues such as landscape, noise, neighbour amenity, wildlife etc. In addition there have been several responses relating to much smaller parcels of land within larger 'zones'.

These are important issues, but the detail of the site selection can only be undertaken following Sustainability Appraisal and much more detailed infrastructure planning work.

The purpose of this Green Belt Review is to inform future site selection but only on Green Belt grounds.

### What is the purpose of Green Belt?

The fundamental aim of green belt policy is to prevent urban sprawl by keeping land permanently open.

- Green Belt is not the same as 'greenfield', the Green Belt can, and does, include land which is previously developed i.e. brownfield
- Green Belt has 5 very specific purposes as defined by the National Planning Policy Framework (NPPF) (page 19), the purposes of the Green Belt do not include issues such as landscape quality, providing recreation space or protecting wildlife habitat. All of these issues will be considered as part of the site allocations process.

### Who can alter the Green Belt boundaries and when?

In accordance with the NPPF (paragraphs 83 & 84) it is for local authorities (i.e. Broxtowe Borough Council) to define and maintain Green Belt land in their local areas. The Government expects local planning authorities with green belts to establish green belt boundaries in their Local Plans (i.e. The Core Strategy & the emerging Part 2 Local Plan), which can be altered as part of the plan review process.

### Defining New Green Belt boundaries:

The NPPF states:

'When defining boundaries, local planning authorities should:

- ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;
- not include land which it is unnecessary to keep permanently open;
- where necessary, identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;
- make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development;
- satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and
- define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.'

Safeguarded Land – what does this mean?

Safeguarded land is land which is removed from the Green Belt but is not allocated for specific development – to accommodate future growth beyond the current plan period (i.e. 2028). We are required to consider safeguarding land so as not to have to review the Green Belt boundary every time a Local Plan is reviewed (see bullet point 5 above).

The Legal Challenge to the Aligned Core Strategy (Part 1 of the Local Plan):

The Aligned Core Strategy was adopted by Full Council in September 2014, following its adoption it was subject to legal challenge through the High Court, the hearing for which was held in March 2015. The appellant submitted the legal challenge on the grounds that the examining Planning Inspector had failed to consider whether housing numbers should be reduced to prevent the release of Green Belt land, and had failed to apply national policy in considering its release. The legal challenge was **dismissed** (i.e. the Judge did not support the appeal) on 24 March 2015 ([High Court of Justice Decision](#)).

**General Points – Comments on the Assessment Framework Itself**

Who	Comment
18 Nottingham CPRE	<ul style="list-style-type: none"> <li>Broadly support Broxtowe Borough Council's approach to reviewing Green Belt boundaries</li> </ul>
211 Nottinghamshire County Council	<ul style="list-style-type: none"> <li>The County Council welcome the opportunity of cross boarder infrastructure working, to ensure that the facilities meet the needs of the communities. E.g. Rolls Royce (p157), Clifton, (p160) (Not an exclusive list)</li> </ul>
48 Sport England	<ul style="list-style-type: none"> <li>No specific issues - playing pitch review should establish the sites which need to be protected or enhanced and where any new site should be established - this evidence should inform site selection, prevent inappropriate allocation and loss of playing field sites</li> </ul>
615 Whitehead (Concrete) Ltd & Foulds Investment Ltd	<ul style="list-style-type: none"> <li>The Borough Council completely mis-read and misinterpreted the representation made within the previous response- object to Councils considering that 'check the unrestricted sprawl to all built-up areas' "should relate to all settlements (rather than only to "large built-up areas" and towns/historic towns)" - the Council do not have the latitude to broaden the scope of this Green Belt purpose, of NPPF unilaterally</li> </ul>
178 Caunton Engineering Ltd	

73 Stapleford Town Council	<ul style="list-style-type: none"> <li>• Essential that established bridleways, pathways, footpaths etc. should be protected and maintained</li> <li>• Prior to re-designation of green belt it should be ensured land is suitable for development - land flood risk areas should not be deemed suitable for houses</li> <li>• Green Belt should not be sacrificed for affordable housing and extra-care housing provision – location and infrastructure requirements should be key considerations for this type of development</li> <li>• easily accessible policies should be established with regard to the green belt and new build provision in land allocated for both housing and commercial development</li> <li>• Trusted that housing development would be carried out on land already identified for such purposes and not on the Green Belt</li> <li>• Concerns relating to green belt adjacent to Nottingham City – do want further coalescence with Nottingham - green belt break needed</li> <li>• Development on brown field sites should take place prior to green belt land being destroyed by unnecessary development</li> </ul>
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**General comments:**

- Many disagreed with amendments to the Green Belt boundaries in order to accommodate development and stated that brownfield sites should be used first – there were no new sites suggested in any locations that hadn't already been considered for development (many of which were already counted as contributing to the housing land supply). Some of the alternative suggestions to building in the Green Belt were in fact Green Belt sites
- General misconception regarding the purposes of the Green Belt (as set out in the NPPF).

**Critique of the assessment:****Need for Green Belt Review:**Housing Land Supply:

- Do not accept overall housing targets or evidence supporting it
- Five year housing supply calculated across the HMA – no rush to amended Green Belt boundaries - even where a shortage is identified release of greenbelt sites should not follow automatically
- Land supply justification for removal of parts of the greenbelt marginal - no exceptional circumstances - outcome legal challenge to the ACS outstanding and could affect the future planning
- No requirement to ensure a steady supply of housing land in Brinsley, Awsworth, Eastwood and Kimberley
- Windfall estimate should be revised upwards in light of changed to Permitted Development rules
- Review not in accordance with the NPPF - unsound - focus solely on Green Belt as an overriding filter to the suitability of land for development (and does not take into account all economic, social and environmental considerations)
- The Green Belt Review should not also act as the Council's primary document for making site allocations decisions.

Other Issues:

- No clear case for a green belt review and the allocation of additional sites in the existing green belt adjacent to either Eastwood or Kimberley - detailed examination of boundaries is premature
- Identifying sites pre-empts work on Neighbourhood Plans.

**Green Belt Review Document:**

- Consultation documents were not easily accessible - people unfamiliar with planning found hard to comment - lack of publicity
- Disappointed that draft Assessment Framework not changed as a result of consultation
- Document does not contain paragraph numbering - reduces the precision in cross-referencing - requested that subsequent documents adopt a paragraph numbering protocol
- Site visits vitally important - should not over-emphasise desk-based assessment work
- Document omits the reference to “up to”
- Bias and distortion towards solely considering residential - appropriate provision required facilitating wider long term economic needs.

**‘Zones’:**

- No rationale is given to explain how each of the ‘zones’ (and their extent) have been determined – e.g. landscape character areas, topography, physical boundaries, ownership etc. – approach lacks transparency
- The boundaries of each zone are not (adequately) defined, or clear
- ‘Site’s’ assessed in entirety on an all or nothing basis –smaller more appropriate parcels of land have been lost amongst more generalised conclusions of much wider assessments of zones consisting of a larger area with elements of more sensitive Green Belt
- Green Belt Review should assess specific sites put forward through SHLAA as opposed to broad locations/zones.

**Scoring System:**

- The scoring system subjective - overly simplistic and open to bias
- Points system doesn’t take into account important features of the sites which need continued Green Belt protection
- Consideration for the 2004 Inspector’s conclusions have not been factored in –some pieces of land recommended for removal now excluded
- Weight should be given to sites which include previously developed land, uses, structures or characteristics which presently have a detrimental impact upon the openness and character of the green belt and countryside location.
- ‘Deliverable” and “developable” sites in and adjacent to MBA must be afforded priority
- Concern regarding exclusion of sites (during phase 1) –all proposed sites promoted for development should be reviewed to ensure a detailed assessment and an appropriate evidence base is gathered
- The use of 1, 2 or 3 stars rather than 1, 3 and 5 stars would more accurately reflect the 3 categories of differentiation
- “Rounding off” is subjective - scale of development needs to transcend such a generic concept - should not be applied in a dogmatic manner

- Developments that form a natural rounding off of the settlement and one that consists of an extension of the existing urban form, should be given priority over sites that are within the open countryside - sites should relate well to existing built up areas
- Sites should not be required to have 2 or more boundaries adjoining the settlement - each site should be considered on its individual merits, particularly having regard to the site specifics of both the parcel of land in the context of its surroundings and from the perspective of the potential intended target use for that land were it to be removed from the Green Belt
- Object to non-committal stance in respect of the 5th Green Belt purpose - positive emphasis should be placed upon previously developed land within the Green Belt within or adjacent to settlement
- Layout, design and landscaping can retain appropriate gaps and defensible spaces within developments that ensure that settlements do not merge
- Eastwood and Brinsley are areas of land historically sensitive with regards the connections with DH Lawrence - It is important to protect such assets
- Concern regarding 2 stage approach i.e. removing sites from further consideration
- Take issue with the way in which landscape is assessed.
- No consideration of the potential for more active recreational use (as per para 81 of the NPPF).

**Safeguarded Land:**

- Unclear if it is intended to safeguard land for future development - safeguarded land should be designated - explicitly recommended by ACS Inspector
- Limiting review to accommodate growth up to the 2028 means that a further Green Belt review inevitable (not NPPF compliant).

**Defensible Boundaries:**

- Support given to the need to assess urban sprawl – whilst presence of existing defensible boundaries important they're not a requirement (in accordance with ACS Policy 3) - strong defensible boundaries can be designed into development
- Too much importance attached to long term boundaries - one factor among many.

**Wildlife:**

- Noted that nature conservation per se is not one of the purposes of the Green Belt however several of the review sites contain Local Wildlife Sites (LWSs) and Local Nature Reserves (LNRs) (and potentially other areas of notable habitat) - hoped that such sites would be protected and buffered from future development; if development considered these sites should be incorporated into the wider Green Infrastructure and ecological networks
- Early environmental appraisal of all sites requested to inform design and identify opportunities for biodiversity mitigation and gain
- Many sites are close to corridors as identified in the draft green infrastructure strategy
- Green Belt important particularly along the Erewash Valley - Living Landscape Area
- The Nottingham Derby Green Belt is crucial for the separation of the two cities and to ensure a green lung is present for people and wildlife
- Concern that methodology doesn't consider impacts on wildlife sites - these sites should, ideally, remain in green belt

- Indirect impacts (i.e. those caused by development on adjacent land) - needs to be considered -certain sites/habitats/species are particularly sensitive
- Sites designated as GI, often fall into inappropriate management, such as too frequent mowing, which seriously damages the habitats present
- Concern that Green Belt incursion has the potential to further fragment important areas of linked habitat, such as along the Erewash Valley.

**HS2:**

- No specific comments - noted that some of the Green Belt land being considered is either on or in very close proximity to the proposed Phase Two route - this land may be required in the future by HS2 Ltd to construct and/or operate the railway.

**Coal Mining:**

- Area contains coal and mineral resources which are capable of extraction by surface mining operations - resources should not be unnecessarily sterilised by new development. Where this may be the case, The Coal Authority would be seeking prior extraction which has the benefit of removing any potential land instability problems in the process
- Area previously subjected to coal mining – left a legacy -most past mining is generally benign in nature; however potential public safety and stability problems can be triggered and uncovered by development activities
- Approximately 1,588 recorded mine entries and around 33 coal mining related hazards in Broxtowe have been reported - 31% of Broxtowe within 'Development High Risk Area' defined by The Coal Authority
- If a development is to intersect the ground then specific written permission of The Coal Authority may be required
- Site allocations should include criterion which assessed coal mining data (in accordance with NPPF guidance)
- Emphasise former mining activities and related hazards are not constraint on development - preferable for appropriate development to remove public liabilities on the general tax payer.

**Comments that refer to the site assessments without a site being identified:**

Who	Comment	Broxtowe Borough Council Comments
<b>Public</b>		
	<ul style="list-style-type: none"> <li>No key definitions ‘regeneration’, ‘development’, ‘appropriate development’</li> <li>A cost/benefit analysis of Broxtowe’s stakeholders would be useful</li> <li>Green Belt should remain as it is unless benefits will accrue for whole of population of Broxtowe</li> </ul>	<p>Add definitions in a glossary</p> <p>Cost/Benefit analysis was undertaken in the Core Strategy</p>
	<ul style="list-style-type: none"> <li>BBC done very little to publicise the fact that it has given planning rights for all of the farm land opposite Bilborough college accessed via Bilborough Road</li> <li>There has been no publicity over this loss of land for what will no doubt be executive homes – not even much needed social housing</li> <li>Land has been allowed to go to scrub land by developers who knew that the Council would cave in and allow building off Woodhouse way</li> <li>Green Belt change is politically motivated and not in public interest</li> <li>Green Belt protection should be restored</li> </ul>	<p>No planning permission or allocation has been made on land opposite Bilborough Road</p>
	<ul style="list-style-type: none"> <li>Loss of Green Belt is important as it will allow one area to merge with another to become one large conurbation.</li> <li>Important for local residents to be able to enjoy nature and feel refreshed</li> <li>Natural areas are important for wildlife and for good health</li> <li>Build on brownfield sites before considering Green Belt.</li> </ul>	<p>Brownfield land is a priority for development but some Green Belt release is still required</p>
	<ul style="list-style-type: none"> <li>Once land has been designated Green Belt it should remain as such</li> <li>There are other solutions to our housing problems</li> <li>If Green Belt is eroded they become too small to sustain wildlife</li> <li>Few sanctuaries left outside backdoors</li> <li>Brownfield sites and empty rented accommodation should be used instead of looking at easy options.</li> </ul>	<p>Brownfield land is a priority for development but some Green Belt release is still required</p>
	<ul style="list-style-type: none"> <li>Green belt is for well-being of people and home for ground nesting birds</li> <li>Destroying Green Belt causes anger and depression</li> </ul>	<p>Nature Conservation Issues will be considered in detail when taking decisions on site allocations</p>

## Awsworth

	Number of people	
	Agreed with (in whole or part)	Disagreed with (or made no further comment)
Zone 1	1	8
Zone 2	3	10
Boundary Change	1	13

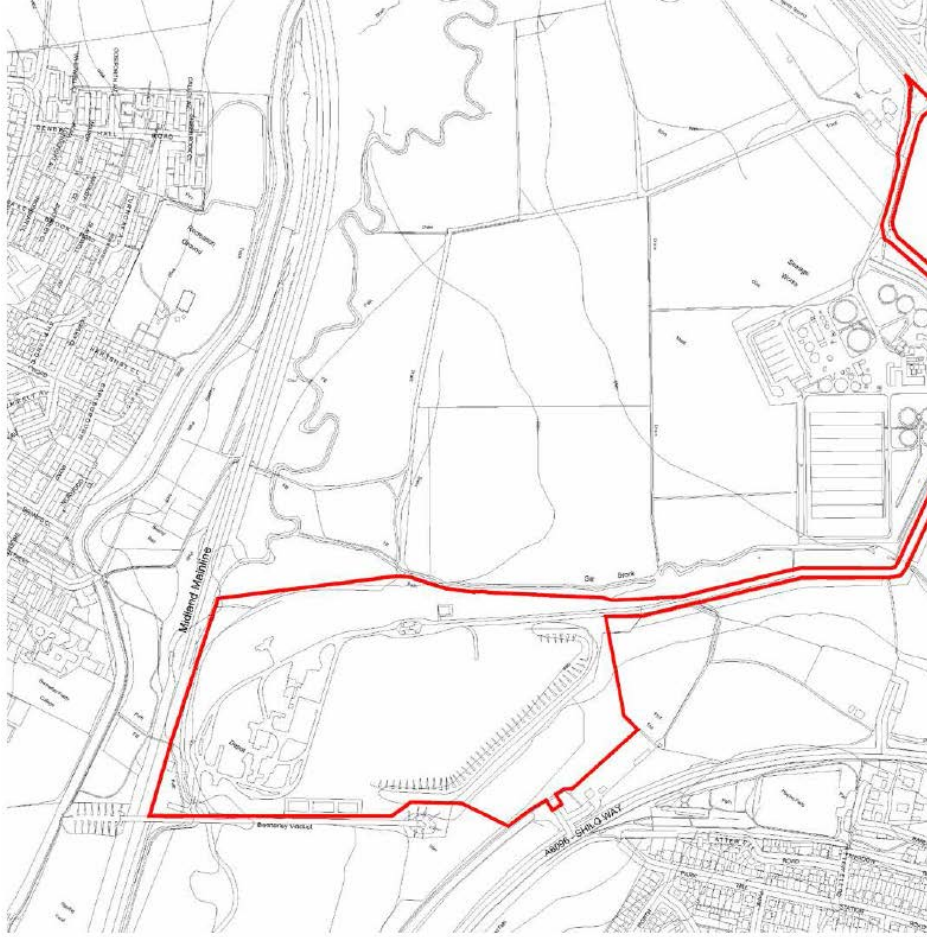
Who	Comment	Broxtowe Borough Council Comments
<b>Zone 1:</b>		
<b>Public Bodies and Interest Groups</b>		
18 Nottingham CPRE	<ul style="list-style-type: none"> <li>East is more important than the West for the purposes of the Green Belt</li> </ul>	
<b>Public</b>		
<p>Brownfield Sites:</p> <ul style="list-style-type: none"> <li>There is enough ex industrial sites which could be used</li> </ul> <p>Wildlife:</p> <ul style="list-style-type: none"> <li>Wildlife would be destroyed – area provides habitats for birds</li> </ul> <p>Local Facilities:</p> <ul style="list-style-type: none"> <li>No local amenities apart from small shop</li> <li>Small school could not take influx of children</li> </ul> <p>Flooding and Drainage:</p> <ul style="list-style-type: none"> <li>Mains sewers over capacity - have previously flooded homes</li> </ul> <p>Traffic:</p> <ul style="list-style-type: none"> <li>Compensation would be payable for excess noise from by-pass</li> <li>There is no reliable public transport</li> <li>Traffic congestion a problem – will be made worse when station opens</li> </ul> <p>Other Issues:</p> <ul style="list-style-type: none"> <li>Concern regarding built form and design of proposals</li> <li>Inadequate consultation</li> <li>Bell pits on site</li> </ul>		<p>Brownfield land is a priority for development but some Green Belt release is still required</p> <p>Other issues raised will be considered in the Sustainability Appraisal and Infrastructure Development Plan before final decisions on site allocations are made</p>
<b>Zone 2 – including proposed Green Belt Change</b>		
<b>Public Bodies and Interest Groups</b>		
18 Nottingham CPRE	<ul style="list-style-type: none"> <li>Agree [if an allocation is to be made in Awsworth], it should be adjacent to the West rather than the East</li> <li>Awsorth bypass could form defensible boundary</li> <li>Visual impact of any development West of Awsorth remains an issue</li> <li>Protection of wildlife should be also be an aim of any development in this area</li> <li>West of Awsorth would narrow the Erewash Valley wildlife corridor; SINC in the area should be protected</li> <li>Welcome vehicular access from new development would not be provided on to Awsorth bypass, and commitment to</li> </ul>	Noted

	good cycling and walking links to the new Ilkeston station	
60 Erewash Borough Council	<ul style="list-style-type: none"> <li>• Growth of Awsworth should capitalise on close proximity to Ilkeston railway station - fostering sustainable travel e.g. additional (or re-routed) local bus services, or enhancements to footpaths, roads and cycleways</li> <li>• EBC has produced the <b>Ilkeston Gateway Supplementary Planning Document (SPD)</b> - framework transport/access proposals will be considered against in order for its full economic potential to be reached</li> <li>• Importance of collaborative working - EBC wish to provide support to any future efforts to further enhance connectivity between Awsworth and Ilkeston station</li> <li>• Disused Bennerley Viaduct important as part of the accessibility network - aware of efforts to return the Viaduct to an active use and generally support any such initiatives in this regard. Its re-establishment could contribute to enhancing the local Green Infrastructure network and allow walkers and cyclists to cross and explore the Erewash Valley in an east-west direction</li> <li>• Viaduct would also contribute to the extension of the Great Northern Greenway, a recreational trail, beyond the current point of termination at Cotmanhay, crossing the Erewash Valley and finally over into Broxtowe heading in the direction of Awsworth</li> </ul>	Noted
2548 Park and Environment (Broxtowe Borough Council)	<ul style="list-style-type: none"> <li>• Happy with this approach with retention of Nottingham Canal Local Nature Reserve and adjacent meadows</li> <li>• Historic toad migration issues here near Park Hill - indications are that activity has ceased but needs checking with Nottinghamshire County Council</li> </ul>	Noted
<b>Local Council</b>		
68 Awsworth Parish Council	<ul style="list-style-type: none"> <li>• Council has strong opposition to the removal of this land to the Green Belt</li> <li>• Proposal represents further intrusion into the countryside</li> <li>• Erewash Valley is important area of environmental significance which includes River Erewash, Erewash Canal, countryside footpaths and wash of habitats for variety of wildlife</li> <li>• Area shaded on the map includes Shiloh Recreation Ground which is owned by the Parish Council and could not be released for anything other than community recreation</li> <li>• By removing the site from the Green Belt the way is open for various types of development including residential, trade and industrial</li> <li>• Apart from impact on local wildlife it will increase traffic where there is an inadequate infrastructure provision</li> <li>• Access directly from Shiloh way would be difficult and undesirable</li> </ul>	<p>Less than half of the area would be needed for housing allocation based on current information in the SHLAA</p> <p>If Awsworth Parish Council consider other options including brownfield sites are preferable these can be put forward via a Neighbourhood Plan</p>

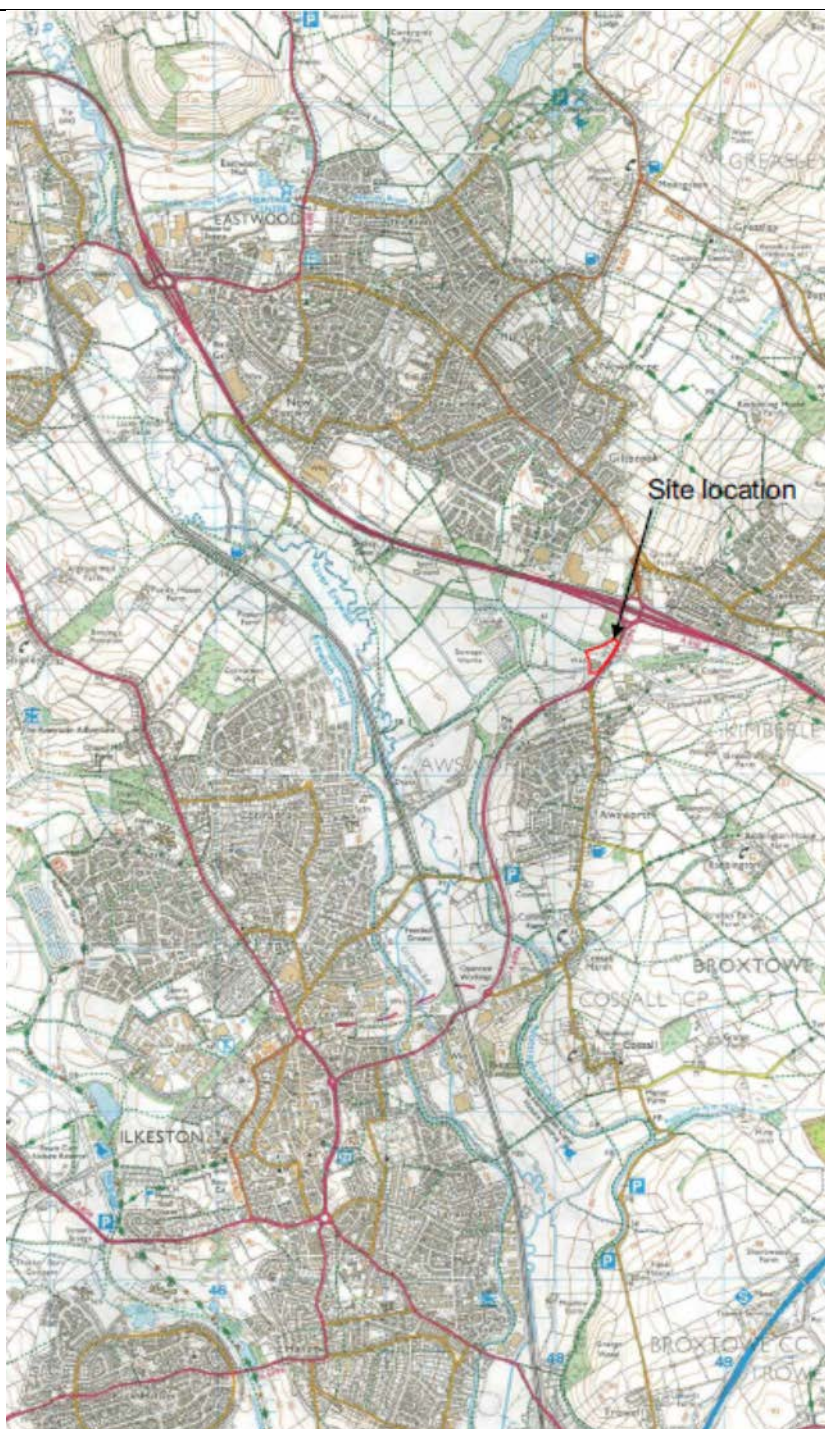
Councillor		
315 Cllr L Ball	<ul style="list-style-type: none"><li>Existing Green Belt prevents Awsworth merging with Cossall, Greasley, Kimberly and Ilkeston</li><li>Green Belt boundaries need to be maintained to protect the village and maintain ecology of land surrounding village</li><li>When the By-Pass was built a number of toad tunnels were incorporated into the design to protect breeding ground of toads around the Nottingham Canal</li><li>Awsworth will increase by 15% compared to other towns and villages which is too large</li><li>No health care facilities, poor bus service (which has impact on residents who feel isolated) and poor retail provision</li><li>Car ownership is a necessity to access employment</li><li>Key junctions on A610 in Giltbrook area, M1 junction 26 and Nuthall are heavily congested (defined as over-capacity at peak times) in ACS transport Modelling dated November 2012</li><li>Access from Station Road / Park Hill extremely narrow – parking problems already exist along the road</li></ul>	Less than half of the area would be needed for housing allocation based on current information in the SHLAA If Awsworth Parish Council consider other options including brownfield sites are preferable these can be put forward via a Neighbourhood Plan
Public		
Agree with Green Belt boundary change		
<ul style="list-style-type: none"><li>The area is currently subject of anti-social behaviour such as fly-tipping, dog fouling, fires, drug dealing and abandonment of stolen vehicles – has an impact on existing residents</li><li>Land owner is irresponsible - field is not properly maintained or secured and fence hasn't been repaired for 10 years - surprised travellers have not occupied site</li></ul> <p>Suggested benefits of development:</p> <ul style="list-style-type: none"><li>Would like development to create access and parking for properties on Chesterman Close as they do not have current vehicular access –‘vehicle-free’ areas have not worked</li><li>Financial contributions could provide new recreation ground or update existing facilities – sports pavilion on The Lane Recreation Ground has no toilets or showers. Awsworth would like same facilities as those on the Basil Russell playing fields in Nuthall</li><li>Developers could build an energy efficient community facility which is fit for purpose (unlike Awsworth Village Hall) - would allow the sports club to be self-funding</li><li>Bypass forms a natural boundary</li><li>Land is of no agricultural value</li><li>Development would not affect the skyline</li></ul>		Noted
Disagree with Green Belt boundary change		
Green Belt: <ul style="list-style-type: none"><li>Green Belt boundaries should only be altered in exceptional cases</li><li>The green space on Newton Lane separates Awsworth from Cossall</li><li>Development will take the village closer to Cotmanhay</li><li>New buildings in the Green Belt are inappropriate - removing Green Belt</li></ul>		Brownfield land is a priority for development but some Green Belt release is still

<p>protection will result in development and would increase urban sprawl</p> <p>Effect on trees and wildlife:</p> <ul style="list-style-type: none"> <li>• Only Green Belt corridor on this side of village which allows wildlife to travel between Kimberley, Cossall, Trowell and beyond</li> <li>• Area contains precious trees and wildlife which would be destroyed - area provides habitats and is much needed and is worthy of continued protection.</li> <li>• Loss of landscape; visual amenity and biodiversity</li> <li>• Toad crossing were installed when the bypass was constructed, toads and newts could be a problem - since bypass constructed there has been a significant reduction in the amount of wildlife</li> </ul> <p>Impact on the local area:</p> <ul style="list-style-type: none"> <li>• Awsworth will already feel the adverse effects when the open cast mining commences, this proposal will compound such unnecessary erosion of our surrounding green belt further</li> <li>• Awsworth will more than doubled in size –character of the village will be ruined - village feel needs to be kept</li> </ul> <p>Traffic and Transport:</p> <ul style="list-style-type: none"> <li>• Newtons Lane access is inadequate - access should be onto the bypass which should have its speed limit reduced to 40 mph to make it safe</li> <li>• Zone is buffer and "green lung" from the bypass for existing residents - who would pay compensation for excess noise from by-pass?</li> <li>• There is no reliable public transport</li> <li>• Traffic congestion a problem – will be made worse when station opens</li> <li>• The bypass was built to relieve the villages of Awsworth and Cossall, the large amount of homes that are being proposed would make at least 350 extra vehicles going through the village and using Newtons Lane</li> <li>• Roads are very busy at peak times, traffic already bottle necks through the village as overflow vehicles shortcut the bypass causing problems locally with residential traffic becoming unable to exit roads like Newtons Lane and Station Road</li> <li>• It would also cause a further danger to traffic (and the animals) - Newton's Lane would become race track</li> <li>• There should be access off the A6096 Awsworth bypass rather than Newtons Lane</li> </ul> <p>Impact on Tourism:</p> <ul style="list-style-type: none"> <li>• The area around the Canal nature reserve has become a popular walking and cycling spot, with the proposal visitors would be put off by the urban sprawl</li> </ul> <p>Local Amenities:</p> <ul style="list-style-type: none"> <li>• No local amenities apart from small shop</li> <li>• Small school could not take influx of children</li> <li>• Area is used for recreation by villagers including for horse riding</li> <li>• Village infrastructure can't cope unless schools, transport etc. are given an injection of cash - no surgery in village</li> </ul> <p>Flooding and Drainage:</p> <ul style="list-style-type: none"> <li>• Where would sewage go - mains sewers flooded a number of times into homes</li> </ul>	<p>required</p> <p>Other issues raised will be considered in the Sustainability Appraisal and Infrastructure Development Plan before final decisions on site allocations are made</p>
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<ul style="list-style-type: none"> <li>• Water will drain off the site onto Shilo Way and then into the Canal which holds water from flowing into the Erewash Valley to prevent flooding elsewhere - will increase flood risk elsewhere</li> <li>• Existing natural drainage is at capacity, hence flooding on bypass - development would create waterlogging and flooding</li> <li>• Water supply would be affected</li> </ul> <p>Other Issues:</p> <ul style="list-style-type: none"> <li>• Providing Awsworth with a Bypass which is now being used as a defensible boundary to allow building right up to it</li> <li>• The site behind Newton's lane was previously mined and there are bell pits recorded</li> <li>• There is enough ex industrial sites &amp; brownfield sites in Awsworth area that can be developed for the housing requirements - these sites blot the landscape and need development before Green Belt</li> <li>• Quality of life and convenience should be taken into account - no thought for very old or very young</li> <li>• Development will mean more accidents and pollution</li> <li>• House prices will be affected</li> <li>• High density housing would cause a design incorporating tall buildings which would cause loss of privacy for existing residents - building next to existing bungalows dictate low height housing to prevent loss of light</li> <li>• Construction noise would be intolerable</li> </ul>	
<b>Alternative Awsworth Green Belt Boundary Changes</b>	
<ul style="list-style-type: none"> <li>• Waste ground next to Bennerley Viaduct – accessed from A610</li> <li>• Use of this site would help to alleviate Anti-Social behaviour (bikes using site)</li> <li>• Access to the roundabout alongside Ikea and no encroachment onto existing housing</li> <li>• 20 hectare former Bennerley Coal Distribution Depot site - derelict brownfield site previously used for reception, storage and despatch of coal - enclosed by the railway; the Bennerley Viaduct and Shilo Way and by the sewage treatment works to the north - Green Belt boundary would be strengthened by moving it to align with the railway, the viaduct and the sewage treatment works</li> <li>• Site has existing vehicular access and highway serves the site from the A610.</li> <li>• Mature woodland runs along the boundaries</li> <li>• Does not contribute to the open characteristic of the Green Belt - unsightly and contains large areas of hard-standing</li> <li>• The site would not extend the built up area of settlement boundaries</li> <li>• Development would not reduce the size of the gap between settlements and would not result in the perception of reducing the gap between settlements</li> <li>• Site within "Erewash River Corridor" constituting part of wider Regional Character Area "Nottinghamshire Coalfields" – classed as "urban fringe.....strongly influenced by surrounding built and industrial development along the village sides" – site is urban fringe and not "open countryside"</li> <li>• Development would impact on the setting of viaduct (Grade 2* Listed) and view of Awsworth from the viaduct, however so would lawful use of site</li> </ul>	<p>Many people have suggested that the brownfield site adjacent to Bennerley Viaduct is not in the Green Belt (which is incorrect) and that this should be used instead of the Green Belt</p> <p>The area adjacent to the viaduct is important in maintaining the open gap between Awsworth/ Eastwood and Ilkeston</p> <p>There are other means of securing the repair of the viaduct which are</p>

	<ul style="list-style-type: none"> <li>• Development would provide opportunity to repair the viaduct (identified as 'at risk' by English Heritage)</li> <li>• Development would enable walking and cycling links to and across Bennerley Viaduct to be delivered</li> <li>• Development could make positive contribution to the Borough's employment requirements – need to provide adequate and flexible supply of employment land - site can meet the specific needs of a railway related operation that would not harm the Green Belt</li> </ul>	being explored by the site owners
		
	<ul style="list-style-type: none"> <li>• North side of Awsworth so that there would be land between could soak up water to stop it going into the Erewash Valley</li> <li>• around the A6096 down towards A610 including the scrapyards would be better (if they wanted to sell the scrapyards)</li> <li>• Area between Gin Close Way and the Island (Ikea A610) – there are large areas on both sides of the road - Suitable for building with good road access</li> </ul>	This area would reduce the gap between Awsworth, Eastwood and Kimberley. The merits of individual sites will be considered in the Sustainability Appraisal
615 Whitehead (Concrete) Ltd & Foulds Investment	<ul style="list-style-type: none"> <li>• Additional area should be removed to accommodate B1 office development</li> <li>• Site is perceived as visually forming part of the urban area of Awsworth and exhibits brownfield industrialised characteristics</li> </ul>	This area would reduce the gap between Awsworth, Eastwood and Kimberley. The

Ltd	<ul style="list-style-type: none"> <li>• Visually contained</li> <li>• Does not contribute to the openness of the Green Belt nor prevent coalescence, does not check the unrestricted sprawl, does not prevent neighbouring towns from merging, does not assist in safeguarding the countryside from encroachment and does not preserve the setting and special character of historic towns</li> <li>• Potential to assist in urban regeneration, by encouraging the recycling of the site itself</li> <li>• Development will have no impact upon the ability to prevent neighbouring towns merging; site currently does not effectively fulfil this Green Belt function</li> <li>• Development will not safeguarding the countryside from encroachment to any lesser or greater degree</li> <li>• Adopted local plan proposals map does not expressly define the settlement boundary; the definition of urban land is blurred. Site visually forms part of the urban area associated with Awsworth</li> <li>• Green Belt Review has not given consideration to the potential future office employment potential of site</li> <li>• The Green Belt review has not included any consideration of the need for land to be released from the Green Belt to assist existing companies that provide employment and economic benefit to the Borough</li> <li>• Development will enhance landscape of the site</li> </ul>	merits of individual sites will be considered in the Sustainability Appraisal
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5894 Bull J

- Use up old factory and industrial areas in Sandiacre and Stanton village

**Brinsley**

Who	Comment	Broxtowe Borough Council Comments
<b>All Zones in Brinsley</b>		
1448 SABRHE	<ul style="list-style-type: none"> <li>• Green Belt boundaries in Brinsley serve two purposes – prevent encroachment into the countryside and preserve the character of the last true village in Brinsley</li> <li>• Green Belt boundaries may only be changed in</li> </ul>	<p>The principle of Green Belt review has been established in the Core Strategy</p> <p>Brinsley Parish Council will</p>

	<p>exceptional circumstances – we do not believe they exist – unless the village decides differently through the neighbourhood plan (as envisaged by the Localism Act) there can be no justification for change</p> <ul style="list-style-type: none"> <li>• Changing Green Belt boundaries prior to the production of a neighbourhood plan denies the community the choice of the siting of new development - premature</li> <li>• The points system has been inaccurately used – use of local knowledge could have avoided this</li> <li>• English Heritage comments should have been taken into account</li> <li>• Items in the Framework consultation paper have been inadequately addressed: Purpose – there is no definition of exceptional circumstances. Overall approach – ‘local knowledge’ has been changed to ‘professional judgement’. Whose judgement is used in the assessment (it’s not local residents)</li> <li>• Failure to utilise local knowledge has resulted in a lack of appreciation of the Heritage site, Local Nature Reserve and Historic Landscape related to D H Lawrence especially in in zone 4 (which the Inspector identified as important and to be protected)</li> <li>• Other zones include mature landscape and SINCS sites worthy of protection</li> <li>• Approach not acceptable – more land is being removed from the Green Belt than is needed</li> <li>• The figure for Brinsley is up to 150 so when SHLAA sites are considered plus windfall what number of houses does the 3.36acres of zone 4 represent? It is unreasonable to take more than is required from the Green Belt</li> <li>• Unreasonable to release Green Belt in the absence of a planning application - boundary changes should be based on development proposals</li> <li>• No site in Brinsley would assist in urban regeneration. Brinsley is neither urban nor in need of regeneration</li> </ul>	<p>have the option of putting forward alternatives including bringing forward brownfield sites through the neighbourhood plan process</p> <p>Comments of Historic England and other Statutory Consultees will be considered in detail before any final choices are made regarding site allocations</p> <p>The consultation deliberately included more land than would be needed with choices to be made later possibly in conjunction with the Brinsley neighbourhood plan process</p>
<b>Zone 3</b>		
<b>Public Interest Group</b>		
1448 SABRHE	<ul style="list-style-type: none"> <li>• Perception of the reduction of the gap would be significant: physical gaps very few along Cordy Lane towards Underwood</li> </ul>	Zone 3 is not currently proposed to have Green Belt boundaries amended

	<ul style="list-style-type: none"> <li>Does not have the feel of open countryside, cannot be seen from Cordy Lane apart from the narrow gap</li> <li>Footpaths across the site</li> <li>Would have no impact on the Conservation Area</li> <li>Close to SINC site 2/263 and 5/2368</li> </ul>	
1448 SABRHE on behalf of 70 individuals	<ul style="list-style-type: none"> <li>Appraisal inaccurate and takes no notice of local knowledge or values</li> </ul>	The purpose of the assessment is to make judgements solely on Green Belt grounds and is considered to be accurate on this basis. Local knowledge would assist greatly in the preparation of a neighbourhood plan
<b>Developer/Landowner</b>		
5920 Soult S	<ul style="list-style-type: none"> <li>On page 25 it states “Most of the site is well contained by defensible boundaries with .....” However on page 8 the assessment matrix clearly states that the criteria for one point are “The site is well contained by strong physical features which can act as defensible boundaries.....” Therefore the zone should be awarded 1 point instead of 3</li> <li>Zone 3 “has three boundaries adjoining the existing settlement of Brinsley” and has been awarded 3 points. The assessment matrix that clearly states in the 1 point criteria that ‘That the site has two or more boundaries adjoining a settlement...’; therefore the site should have been awarded 1 point</li> <li>Page 25 the ‘Prevent neighbouring settlements from merging into one another’ section has scored 4 points. The ‘break’ referred to is not a ‘break’ between the two settlements, but merely a gap between two properties that are categorically in Brinsley, and therefore totally irrelevant to this section; therefore the assessors’ score of 4 is unjust</li> </ul>	This zone is important to prevent merging between Brinsley and Underwood and the assessment is considered to be accurate
<b>Zone 4</b>		
<b>Public Interest Groups</b>		
142 English Heritage (now Historic England)	<ul style="list-style-type: none"> <li>Concerned at scale and location of proposed removal of the Green Belt at Brinsley</li> <li>Green Belt protects setting of heritage assets including the Conservation Area, Grade II listed Church (which currently enjoys an open landscape setting to the west and east) and</li> </ul>	Historic England had no unresolved objection to the Core Strategy including on sustainability grounds which proposed up to 150 dwellings at Brinsley. Their

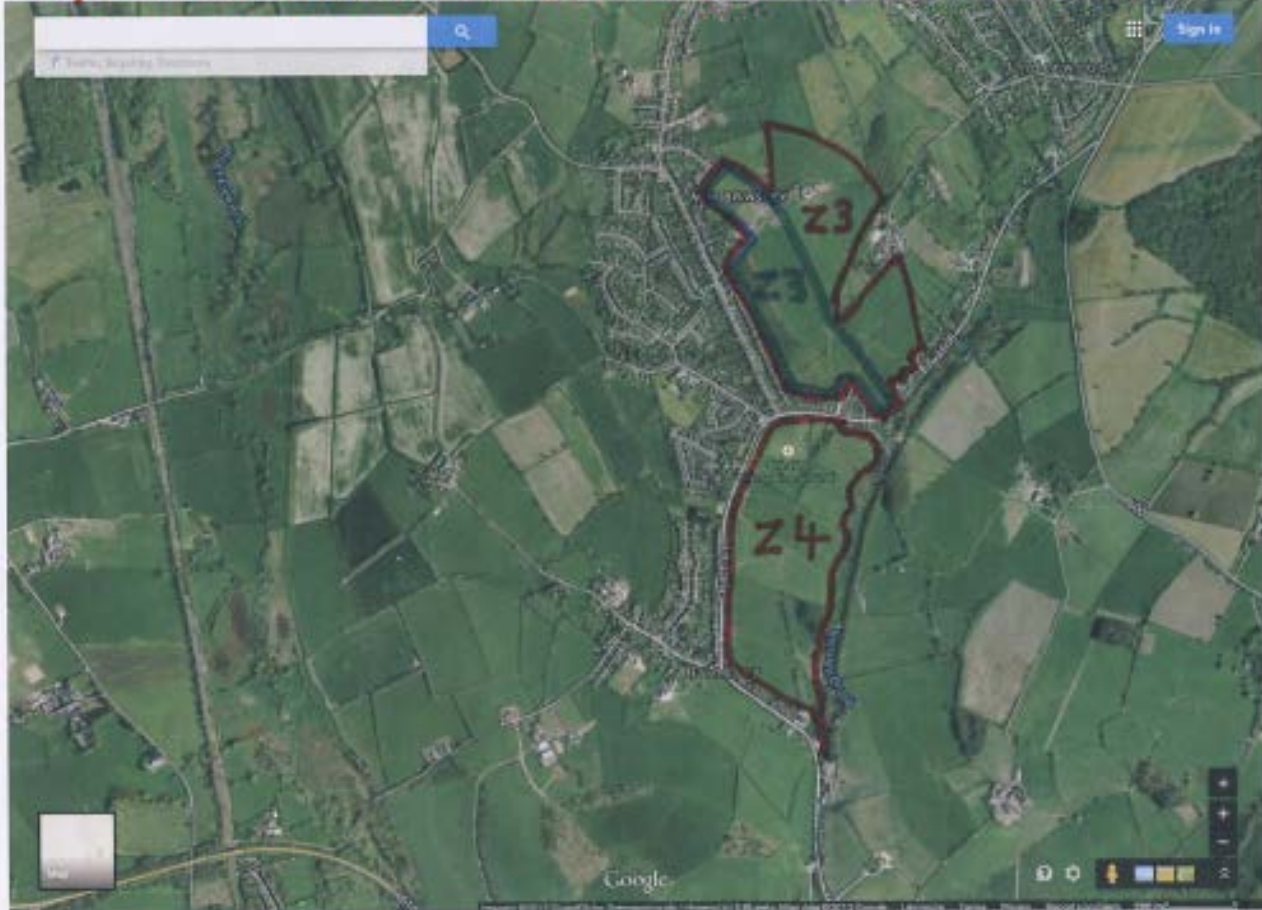
	<p>non-designated heritage assets relating to the colliery site (including links to D H Lawrence) and the footpath which forms the former railway line</p> <ul style="list-style-type: none"> <li>Historically development has occurred to the west of the Church Lane - development to the East may be unsustainable</li> <li>As the development need for the settlement is comparatively small – why have the particular boundaries been chosen?</li> <li>2003 Local Plan Inspector recognised value of the agricultural land and importance area fulfils in the Green Belt. Inspector considered more sustainable locations that could meet housing requirements</li> </ul>	<p>expertise relates to the historic environment and their view on this issue will be very influential on which sites are selected for development</p>
18 Nottingham CPRE	<ul style="list-style-type: none"> <li>Agree that if a residential allocation is to be made in this area, it should be in Zone 4</li> <li>Brinsley Brook is more defensible Green Belt boundary than features in the other zones around Brinsley</li> <li>Brook would be a weaker boundary than harder features such as a road, once the area has been removed from the Green Belt, it will be difficult to resist further development up to the brook</li> <li>Currently small percentage of Zone 4 will be needed for housing; this could change if other sites not developed at pace assumed and current national planning regime remain unaltered. Regime has allowed 5 year housing land targets to trump other considerations – this could be the fate of the open spaces and the setting of the industrial heritage in and around Zone 4</li> </ul>	Noted
2548 Park and Environment (Broxtowe Borough Council)	<ul style="list-style-type: none"> <li>Obvious need to preserve wildlife corridor along the brook and buffer areas around existing LNR and park</li> <li>Opportunities to improve local access away from the busy road welcomed</li> <li>Could there be a Green corridor between the Recreation Ground and the Headstocks site.</li> <li>Brook runs through the site</li> <li>There needs to be an extended green space buffer around the Headstocks site</li> </ul>	Noted
34 Nottingham Wildlife Trust	<ul style="list-style-type: none"> <li>Potential impact on Brinsley Headstocks Local Nature Reserve and LWS (NBGRC Ref 5/3405 Brinsley Headstock and 5/2302 Brinsley Brook Grassland)</li> </ul>	Noted

	<ul style="list-style-type: none"> <li>Flood plain meadows along the Brinsley Brook - would be sensitive to hydrological changes as a result from adjacent development (e.g. degradation of water quality and potential increase in incidences of flooding) as well as increased recreational disturbances to wildlife from increases in use of the site</li> <li>Adjacent to brook - important wildlife corridor so important not to sever habitat networks/ linkages</li> </ul>	
1448 SABRHE	<ul style="list-style-type: none"> <li>not adjoining existing settlement, self-contained open landscape. Is not contained by a road on 3 sides –boundary is not road but the existing housing. Recreation ground between site and road and therefore the visible boundary is the recreation ground. Brinsley Brook should not be the boundary – Headstocks heritage site and nature reserved should be preserved and protected by Green Belt. Misleading to say ‘old spoil tip’ is prominent as it is now mature woodland and looks nothing like a spoil tip with much wildlife in evidence</li> <li>Development would result in a limited reduction of the gap between Brinsley and Eastwood, exacerbated if zone 10 developed. Would close the gap between Brinsley and Greasley - parish is abound by Brinsley Brook</li> <li>Comments infer site is not countryside worth preserving. Few houses along Church Lane towards the Church are old properties, part of Brinsley’s historic landscape despite not being included in the Conservation Area. The Care home and resource centre on Cordy Lane cannot be seen from the site and do not form part of it. Site gives a feeling of open countryside and is most noticeable piece in Brinsley. Footpath leads from Church Lane to the Headstocks Heritage site and nature reserve – from there whole site is visible</li> <li>Church is across the A608, not adjacent to the site, most of which is not visible from the church</li> <li>The Headstocks forms major part of the site - noticeable landscape in Brinsley, valued for tourism. Development would obscure important heritage feature and detract from the enjoyment of village landscape. Site is</li> </ul>	<p>This site clearly does adjoin the settlement of Brinsley. No suggestion that development should take place on either the headstocks to the South or the recreation ground to the North</p> <p>Site specific concerns will be considered in the Sustainability process as this review only relates to the Green Belt issues</p> <p>Brinsley Parish Council will have the option of putting forward alternatives including bringing forward brownfield sites through the neighbourhood plan process</p>

	close to the Conservation Area	
2340 Friends of Brinsley Headstocks	<ul style="list-style-type: none"> <li>• Will open the area up to housing development</li> <li>• Brinsley Headstocks is the only Wooden Tandem Headstocks left in the UK and is part of the Brinsley heritage</li> <li>• Development will remove the view of the Headstocks from Church Lane - area known as D H Lawrence's "Country Of My Heart"</li> <li>• Friends of Brinsley Headstocks have worked to improve sites biodiversity and have gained Local Nature Reserve and SINC status on site</li> </ul> <p>Development will have direct detrimental effect on the Headstocks Site by:</p> <ul style="list-style-type: none"> <li>• Increasing the risk of site flooding by excess water run-off into Brinsley Brook</li> <li>• Brook and pond water quality will be affected by construction, road surface and other pollutants</li> <li>• Increased noise pollution will have an effect on the Local Nature Reserve wildlife, with many birds and animals moving from the area. In particular nesting bullfinches, blackcaps, chaffinches and woodpeckers etc. Common bird species would also reduce in numbers</li> <li>• The increase in population in this zone will likely increase the number of domestic animals roaming freely within the site affecting the wildlife balance. Also children within this zone will likely to use the Headstocks site as a playground increasing the risk for injury and site vandalism</li> <li>• Other sites within Brinsley are more suitable for development and would have less of a direct impact on what is a major heritage point for the Brinsley area</li> </ul>	<p>No further comment on which other site in Brinsley would be more suitable for release from the Green Belt</p> <p>Agreed that the setting of the Headstocks would need to be preserved if development does take place</p> <p>Other issues raised will be considered in the Sustainability Appraisal and Infrastructure Development Plan before final decisions on site allocations are made</p>
<b>Developer/Landowner</b>		
5920 Soult S	<ul style="list-style-type: none"> <li>• Zone 4 is on the outskirts of Brinsley and most definitely on the way out of Brinsley. Everyone that passes this site is usually on their way out of Brinsley</li> <li>• Any development should be contained inside the village alongside existing development sites, there are numerous 'squaring' off possibilities such as extending Clumber Ave or build behind Broad Lane (zone 3)</li> <li>• The Headstocks site is a vitally integral part of our heritage and housing development on this</li> </ul>	<p>Zone 4 is considered a better option for development than zone 3 on Green Belt grounds</p> <p>Other issues raised will be considered in the Sustainability Appraisal and Infrastructure Development Plan before final decisions on site allocations are made</p>

- site would hide this monument away forever
- Zone 4 is also at more risk to flooding and would have a greater impact on wildlife than zone 3

### Z3/Z4 EXISTING ZONE BOUNDARIES Z3 PROPOSED NEW BOUNDARY



1002 & 1302  
Anthony T & A

- Northern Boundary of zone 4 should be amended to include an additional piece of land – running along the brook up to boundary fence adjoining 52 Cordy Lane and along that fence up to the A608 (with the fence of 42 Cordy Lane being the opposite boundary)

No 'allocations' are proposed as part of this review. Detailed boundaries will be considered as part of the allocation process

4200 Taylor &  
Burrows Property

- Amendment to north of Eastwood and East of Brinsley would lead to a significant reduction in the gap
- Historically sensitive with regards to D H Lawrence, most significance re: locations used in books, and presence of Durban House

No 'allocations' are proposed as part of this review. Detailed boundaries will be considered as part of the allocation process

#### Local Council

67 Brinsley Parish  
Council

- Disagree that the site is suitable for removal from the Green Belt.
- Conclusion based on flawed points system which undervalues the importance of Church Lane remaining in the Green Belt
- Misrepresents certain characteristics of the

Brinsley Parish Council will have the option of putting forward alternatives including bringing forward brownfield sites through the neighbourhood plan

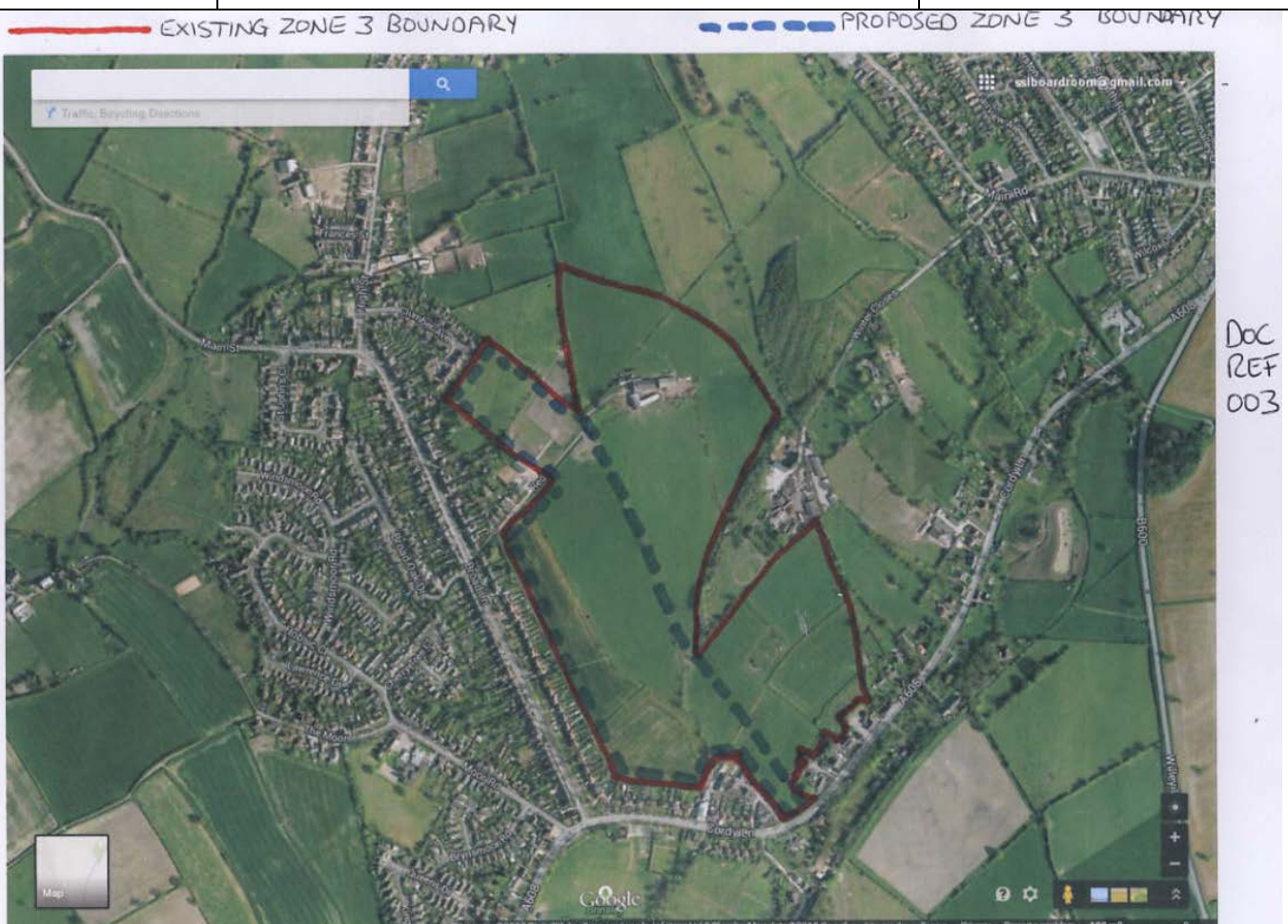
	<p>site and neglects to describe important features which need continued Green Belt protection</p> <ul style="list-style-type: none"> <li>• The 'old-spoil tip' is now a grassy slope with paths through mature woodland which is an attractive feature of the Headstocks Heritage Site</li> <li>• The 'care home' is not present on site – it is situated over the road in the existing residential area</li> <li>• The 'resource centre' referenced is assumed to be the Parish Hall which is situated on the playing field area, away from the proposed development land</li> <li>• The 'several telegraph poles' stand on the roadside and do not encroach upon the site</li> <li>• Adequate recognition is not given to the Headstocks status as an important feature of the D H Lawrence Heritage Site which attracts tourism</li> <li>• Assessment doesn't mention nature reserve within the site or the wildlife corridor which runs the length of the site</li> <li>• Disputes the claim that there is a need to redraw the Green Belt boundaries around Brinsley</li> <li>• Removal of any land in the village will be detrimental to its open aspect and character and would not comply with the NPPF</li> <li>• A brownfield site with the potential for up to 40 dwellings has been ignored - Priority should be given to developing brownfield land where development is needed</li> <li>• Area is highly valued by local residents and visitors and is prominent visually in the village.</li> <li>• Once the site is removed from the Green Belt then it would all be vulnerable to development</li> <li>• Broxtowe should be conserving and enhancing the heritage and natural environment</li> </ul>	<p>process</p> <p>It is not considered that the assessment undertaken in this review is 'inaccurate'</p>
<b>Councillor</b>		
1599 Cllr Booth	<ul style="list-style-type: none"> <li>• Review is premature to the Brinsley Neighbourhood plan</li> <li>• Transparency in decision making on key issues with good strong evidence base on particular issues</li> <li>• Any proposed Green belt changes will come through this new plan once it reaches the end</li> </ul>	<p>The Borough Council is the only authority who is able to amend Green Belt boundaries. However a neighbourhood plan could promote suggestions as to where</p>

	<p>of that process; and the plan become a final document</p> <ul style="list-style-type: none"> <li>• Brinsley neighbourhood plan will have strong defendable boundaries for Broxtowe to work to</li> </ul>	The Neighbourhood Plan would need to accord with the Core Strategy re: housing numbers
36489 Cllr J Handley	<ul style="list-style-type: none"> <li>• Consultation premature as other building options not been considered</li> <li>• There are brownfield sites that could be used to reduce the pressure on Green Belt</li> </ul>	All brownfield options are considered through the SHLAA. Current information is that 41 houses could be built within Brinsley village limits
	<ul style="list-style-type: none"> <li>• Neighbourhood plans should be able to run their course to inform decision of boundary changes</li> <li>• Green Belt will be lost forever</li> </ul>	Neighbourhood Plan will be important but Broxtowe Borough Council cannot wait indefinitely given the importance of having a Local Plan in place
<b>Public</b>		
100 responses received on a standard letter template	<ul style="list-style-type: none"> <li>• Boundary to match the limiting features</li> <li>• Brinsley Headstocks and its own land should be considered as a Conservation Area</li> </ul>	
<p>Green Belt:</p> <ul style="list-style-type: none"> <li>• Exceptional circumstances do not exist - should only be changed if there is proven local need – there is no need in Brinsley</li> <li>• Points system flawed - purposefully skewed to favour this site – no mention of heritage site</li> <li>• Headstocks (D H Lawrence Heritage) relies on having open aspect which would be damaged by building. ‘Old Spoil Tip’ prominent feature in landscape is now attractive grassy slope with mature trees and footpath. Beauty of landscape. Relocate boundary to the brook would spread settlement into open countryside</li> <li>• Residential properties are on edge of site and telegraph poles are on verge adjoining the road. The Care Home is not on the site. ‘Resource Centre’ is situated on playing field away from proposed building land. Important features have been overlooked e.g. Headstocks heritage site, nature reserve, Brinsley Brook wildlife corridor which would be damaged by the removal of Green Belt protection</li> <li>• Last remaining village in Broxtowe, in doomsday book. Character defined by open landscape of Church Lane which is highly prominent and used for recreation. Housing development would be obtrusive</li> </ul> <p>Heritage:</p> <ul style="list-style-type: none"> <li>• The headstocks and the landscape in the vicinity of zone 4 (which includes Vine Cottage) are closely linked not just to the lost mining heritage of the area, but also to its valuable literary heritage (as acknowledged by ACS Inspector)</li> </ul>		<p>The assessment is not considered to contain flaws re: the Green Belt issues</p> <p>Other issues raised will be considered in the Sustainability Appraisal and Infrastructure Development Plan before final decisions on site allocations are made</p>

<ul style="list-style-type: none"><li>• The Council should consider the character and outlook of key local landmarks and areas which are crucial to the identity of the region.</li><li>• The "old spoil heap" is now a green area with fauna that adds to the overall look of the surrounding area, adding to its green belt status</li><li>• ACS policy 11 seeks to preserve and protect historic environment – policy 11 &amp; 12 of NPPF also preserve and enhance natural and heritage environment – can't see how this can be achieved by taking this site out of Green Belt</li></ul> <p>Wildlife:</p> <ul style="list-style-type: none"><li>• Assessment doesn't mention the nature reserve on the site (created by Broxtowe and local residents, which requires protection) and its role as part of a wildlife corridor</li></ul> <p>Recreation:</p> <ul style="list-style-type: none"><li>• Area is valuable and well used by villagers for recreation</li><li>• Enjoyment and use of footpaths would be lost forever</li></ul> <p>Tourism:</p> <ul style="list-style-type: none"><li>• The D H Lawrence Heritage Centre and Birthplace Museum draw tourists and enthusiasts to Eastwood from around the world</li></ul> <p>Traffic and Transport:</p> <ul style="list-style-type: none"><li>• Any more traffic along Church Lane would be unsuitable - extra traffic would be unsustainable</li></ul> <p>Other Issues:</p> <ul style="list-style-type: none"><li>• Site is misrepresented and wrongly described, not assessed fairly, results undervalues site</li><li>• Area larger than required for the number of houses proposed for Brinsley – vulnerable for future development</li><li>• Brownfield land and derelict land should be used prior to land in Green Belt</li><li>• Local residents oppose changes to Green Belt</li><li>• Zone 4 constitutes main character of the village</li><li>• No screening would alleviate noise pollution and visual distraction that would occur if developed</li></ul>		
Alternative Site		
5920 Soult S	<ul style="list-style-type: none"><li>• Zone 3 boundary follows the borough boundary for no logical reason – negatively affect scoring</li><li>• The existing boundary of zone 3 should be reduced as shown below (DOC REF 003). The proposed new boundary would reduce the loss of the gap between Brinsley and Underwood as the new boundary would run parallel to Underwood and therefore would not encroach in any way towards Underwood - the assessment matrix indicates a score of one point would then be applicable</li><li>• The proposed new boundary change would</li></ul>	<p>The assessment is not considered to contain flaws re: the Green Belt issues</p> <p>Other issues raised will be considered in the Sustainability Appraisal and Infrastructure Development Plan before final decisions on site allocations are made</p>

also 'round off' the main Brinsley settlement due to its three adjoining boundaries to the existing settlements

- The revised score for zone 3 would be considerably lower than zone 4, and would make zone 3 the obvious choice as the preferred site to be removed from the Green Belt



5920 Soult S

- Land adjacent to Clumber Avenue should be removed from the current Green Belt. See below (DOC REF 004)
- Clumber Avenue has been extended to provide affordable houses for Brinsley - land was removed from the Green Belt to achieve this
- This 3.5 acre development site is deliverable within the next five year period
- Using the assessment matrix the score will be considerably low and would deliver an immediate solution to the contribution towards the remaining dwelling numbers still to find for Brinsley

The assessment is not considered to contain flaws re: the Green Belt issues

Other issues raised will be considered in the Sustainability Appraisal and Infrastructure Development Plan before final decisions on site allocations are made



## Zone 5

### Public Interest Groups

1448 SABRHE	<ul style="list-style-type: none"> <li>• Constrained by Mansfield Road - not bound by Stoney Lane and Hall Lane.</li> <li>• Misleading to describe old spoil tip as a significant topographical feature (not consistent with description of similar feature on Headstocks site)</li> <li>• The doubt as to the development of this possibly contaminated site from Moorgreen Colliery negates its value in checking sprawl.</li> <li>• Development would result in a reduction of the gap between Brinsley and Eastwood (further reduced) if zone 10 developed</li> <li>• Working farm and residential properties have not caused encroachment – the site does not safeguard encroachment</li> <li>• Would not be highly visible (no adverse effect) from the Conservation Area which stretches away from the site</li> </ul>	<p>Topographically there is a difference between the two sites which is why one has been called a significant feature in the landscape and the other hasn't</p> <p>Brinsley Hill ranges from 60m above sea level on the lowest point next to the hill up to 130m at the highest part covering an area of 435,605msq. In comparison the spoil tip next to the Headstocks is significantly smaller and ranges from 90 meters above sea level on the flat to 99 metres at its highest point covering an area of 8,129 msq</p>
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		Acknowledged that the reduction in the gap between Eastwood and Brinsley would be 'significant' if this zone were developed
<b>Zone 6</b>		
<b>National Interest Group</b>		
142 English Heritage (now Historic England)	<ul style="list-style-type: none"> <li>• Agree with the results of the assessment for zone 6</li> </ul>	Noted
<b>Public Interest Group</b>		
1448 SABRHE	<ul style="list-style-type: none"> <li>• Constrained by Mansfield Road not bound by Stoney Lane and Hall Lane</li> <li>• Misleading to describe old spoil tip as a significant topographical feature, particularly in view of the comment about the similar feature of the Headstocks site</li> <li>• Doubt over possibly contaminated site from Moorgreen Colliery negates its value in checking sprawl</li> <li>• Would result in a reduction of the gap between Brinsley and Eastwood - would cause significant reduction if zone 10 developed</li> <li>• Working farm and residential properties have not caused encroachment</li> <li>• Not highly visible (no adverse effect) from the Conservation Area which stretches away from the site</li> </ul>	Assessment considered to accurately assess site on Green Belt grounds

## Eastwood

Who	Comment	Broxtowe Borough Council Comments
<b>Zone 7</b>		
<b>Public Bodies and Interest Groups</b>		
60 Erewash Borough Council	<ul style="list-style-type: none"> <li>Notes conclusions which recognise the important role to ensure continued separation of settlements</li> <li>Development would additionally serve to substantially narrow the current gap between Eastwood and Cotmanhay</li> </ul>	Noted
<b>Zone 9</b>		
<b>Landowner/Developer</b>		
2685 Bloor Homes	<ul style="list-style-type: none"> <li>Zone too inflexible, assessment of smaller area is necessary – i.e. area immediately around Hall Farm Barns</li> <li>Would get particularly low score re: unrestricted sprawl and safeguarding from encroachment</li> </ul>	Smaller areas will be considered where required as part of the Sustainability Appraisal process
<b>Zone 10</b>		
<b>Public Interest Groups</b>		
18 Nottingham CPRE	<ul style="list-style-type: none"> <li>Would significantly narrow gap between Eastwood and Brinsley</li> <li>Disused railway important wildlife corridor</li> <li>Water quality in this area – close to Beauvale Brook – is sensitive to the impact of development</li> <li>Flooding episodes would be exacerbated</li> </ul>	Noted. Site specific issues will be considered a part of a detailed site selection process
2548 Park and Environment (Broxtowe Borough Council)	<ul style="list-style-type: none"> <li>Good approach - pleased to see nothing proposed near to the Erewash Valley</li> <li>Need to preserve and enhance Brinsley Brook Corridor and may be scope to enhance wetland areas near Lower Beauvale</li> <li>Exiting Green space off Lower Beauvale, managed by Greasley Parish Council needs enhancing as part of any development - potential to create an area of green space that encompasses this area, the cricket ground and any new open space provided as part of any development</li> </ul>	Noted
<b>Landowner / Developer</b>		
2685 Bloor Homes	<ul style="list-style-type: none"> <li>Broad assessment correct</li> <li>Form of the site, surrounding built up area and former rail line, warrant a lower overall score - particularly in relation to preventing neighbouring towns from merging and the effect on the character of historic settlement</li> <li>Whilst the 'on plan' gap between Eastwood and Brinsley would be reduced, would not be readily perceived on the ground given 'ribbon' development</li> </ul>	Noted

	along Mansfield Road, and overall extensive gap between Eastwood and Brinsley	
4200 Taylor & Burrows Property	<p><u>Check the unrestricted sprawl of settlements</u></p> <ul style="list-style-type: none"> <li>Assessment identifies site has two boundaries adjoining the existing settlement of Eastwood (therefore scores 2*). Western section only bound to the south by the existing built form. Development of the western area of the site alone would not be well contained or naturally round off the existing settlement - assessment identifies western section of the site feels quiet open and that development to the east would round off the settlement better. Development to east would not be well connected to the existing built up area of Eastwood or its major services and it not highly sustainable</li> <li>With only 29% of the site required and with access being constrained, categorising zone as 2* in terms of checking unrestricted sprawl is inaccurate</li> <li>Land to the west, although potential contained by the existing railway line, would lead to sprawl due to the open nature of the site along Mansfield Road</li> <li>Would significant reduce gap between Eastwood and Brinsley</li> <li>Zone 10 and Zone 4 are historically sensitive re: D H Lawrence - area to the north, between Eastwood and Brinsley has most significance</li> <li>In addition to impact on setting of the Listed Buildings West of Mansfield Road should be assessed as having a moderate effect on the setting and special character of the historic settlement</li> </ul>	The assessment is considered to accurately assess the site on Green Belt grounds
<b>Local Council</b>		
71 Greasley Parish Council	<ul style="list-style-type: none"> <li>Assessment ignores effect of development on the wider landscape</li> <li>Over emphasis on disused railway line as defensible boundary– it does not have heritage protection and is a linear area of land bounded by hedges - no barrier to development, could be incorporated into wider development proposals</li> <li>Amount of 'open space' visible when travelling along Mansfield Road would be reduced - perception of reduced gap</li> <li>Would destroy valuable views of Eastwood Hall Park and of high ground to the West</li> <li>Important to setting of Eastwood Hall and parkland curtilage. Also close to the D H Lawrence Heritage Centre</li> <li>Eastern part of site has long history of flooding; water builds up in the nearby stream and is added to by</li> </ul>	Greasley Parish Council will have the option of putting forward alternatives including bringing forward brownfield sites through the neighbourhood plan process
672 Willimott R & B		<p>It is not considered that the assessment undertaken in this review is 'inaccurate'</p> <p>Other issues raised will be considered in the Sustainability Appraisal and Infrastructure</p>

	<ul style="list-style-type: none"> <li>over-land flows from the upland area to the north</li> <li>Advisory Groups for Eastwood and Kimberley are not representative of the Parish Council</li> <li>Greasley wish to formulate own neighbourhood plan – Green Belt release in premature and hasty</li> <li>Greasley didn't have a consultation event in their parish</li> </ul>	Development Plan before final decisions on site allocations are made
<b>Local Councillor</b>		
3648 Cllr J Handley	<ul style="list-style-type: none"> <li>Inadequate consultation</li> <li>Land being released too soon (prior to Neighbourhood Plans) - Neighbourhood plans should be able to run their course to inform decision of boundary changes</li> <li>Consultation premature as other building options not been considered</li> <li>There are brownfield sites that could be used to reduce the pressure on Green Belt</li> <li>Not suitable for development as is flood zone and always wet because of springs</li> <li>Additional traffic will be a problem on the A608</li> <li>Green Belt will be lost forever</li> </ul>	<p>Greasley Parish Council will have the option of putting forward alternatives including bringing forward brownfield sites through the neighbourhood plan process</p> <p>It is not considered that the assessment undertaken in this review is 'inaccurate'</p>
316 Cllr M Handley	<ul style="list-style-type: none"> <li>Sustainable boundary to Eastwood is the Brinsley Brook &amp; the Beauvale Brook.</li> <li>Area is in Greasley</li> <li>Area has no sustainable boundary</li> <li>Railway line was built to remove coal from Moorgreen Colliery – it is manmade and could easily be removed in the future for further development which would lead to coalescence with Brinsley</li> <li>Why is all of the land being released if only part of it is needed for development?</li> <li>Land is precious commodity - should be preserved for future generations</li> <li>Food production nationally means we are reliant on global markets for availability and price – we should protect farmland</li> <li>Release of land is premature as Parish is undertaking Neighbourhood Plan</li> <li>Floodplain, acts as a soak away, natural springs on land -would make flooding worse for surrounding residents</li> <li>Would only know SUDs were working once development happens at which point it is too late</li> <li>Would not make existing flooding issues any better</li> <li>Independent survey of catchment area should be undertaken</li> <li>Sewerage system already full</li> <li>A608 very busy – development would make situation worse</li> </ul>	<p>Greasley Parish Council will have the option of putting forward alternatives including bringing forward brownfield sites through the neighbourhood plan process</p> <p>It is not considered that the assessment undertaken in this review is 'inaccurate'</p> <p>Other issues raised will be considered in the Sustainability Appraisal and Infrastructure Development Plan before final decisions on site allocations are made</p>

	<ul style="list-style-type: none"> <li>• Crossing the road is dangerous (and people have to cross to get to the bus stop) – County Council has been asked for a crossing at this point but nothing has happened</li> <li>• Destruction of wildlife corridors</li> <li>• Destruction of D H Lawrence country of my heart</li> <li>• Potential for brownfield development needs to be looked at more closely</li> <li>• Need to allocate land in Green Belt is difficult to explain to residents when developers already have plans for sites not in consultation</li> <li>• Consultation inadequate</li> </ul>	
320 Cllr M Brown	<ul style="list-style-type: none"> <li>• Review is premature and pre-empts Neighbourhood Plans</li> <li>• Support and concur with Greasley Parish Council's submission</li> <li>• Beamlight has more houses than previously thought and Wade printers is available for development (brownfield)</li> <li>• Larger release than thought and this could lead to more building than is acceptable</li> <li>• Inadequate consultation – forms not user friendly</li> </ul>	<p>Greasley Parish Council will have the option of putting forward alternatives including bringing forward brownfield sites through the neighbourhood plan process</p> <p>It is not considered that the assessment undertaken in this review is 'inaccurate'</p>
1605 Cllr S Rowland	<ul style="list-style-type: none"> <li>• Review is premature and pre-empts Neighbourhood Plans</li> </ul>	<p>Greasley Parish Council will have the option of putting forward alternatives including bringing forward brownfield sites through the neighbourhood plan process</p> <p>It is not considered that the assessment undertaken in this review is 'inaccurate'</p>
<b>Public</b>		

<p>Green Belt</p> <ul style="list-style-type: none"> <li>• Site should remain in the Green Belt (as per local residents wish) - removal from Green Belt will lead to development – concern about ease of future development once boundary amended (release is in excess of that required)</li> <li>• Area provides significant break between Eastwood and Brinsley preventing urban sprawl and coalescence</li> <li>• No exceptional circumstances - unmet housing need unlikely to outweigh the harm</li> <li>• Green Belt permanence should be retained (for future generations) – building on Green Belt should be a last resort</li> <li>• Willey/Coney Farm bridle path and fields is much better defensible physical boundary than the non-existent disused railway line</li> </ul> <p>Brownfield Land</p> <ul style="list-style-type: none"> <li>• Brownfield sites in Eastwood should be developed first (rather than taking the easy option) e.g. Walker Street and adjoining Victory Club, the old Beamlight site (which could accommodate more houses), Wades/Burnhams, land off A610 on site of railway sidings past sewerage works, Mushroom Farm, land around Ikea island, Council Offices on Church Street, Chewton Street Allocation, Broxtowe Office on Nottingham Road and land at the side of the A610</li> <li>• Council not considered or encouraged the use of brownfield land - derelict brown field sites would be greatly improved if developed</li> <li>• Developer land banking levels and current planned un-built development across wider Broxtowe should be considered as a contribution towards unmet housing numbers</li> <li>• Densities on brownfield sites should be increased</li> </ul> <p>Flooding and Drainage Issues:</p> <ul style="list-style-type: none"> <li>• Site is floodplain - concern regarding future flooding problems for existing residents – land currently acts as a water holding area for rain water to prevent flooding - house insurance difficult to obtain</li> <li>• Drainage systems old and overloaded (surface water is going into the foul) at times of heavy rainfall whole area turns into a bog (including park next to cricket pitch), the brook cannot cope with more water, it overflows and struggles to contain the running water</li> <li>• Council should ensure that they are informed by site-specific flood risk assessments and a sequential test</li> <li>• Area is classified by the Environment Agency as Flood Zone 3 - development should be located away from areas at high risk of flooding</li> <li>• History of flooding from Brinsley and Beauvale brook - Council should help to keep the brook clean – currently the local residents do this</li> <li>• Water table high and field covered in springs</li> </ul> <p>Traffic:</p> <ul style="list-style-type: none"> <li>• Mansfield Road (A608) cannot cope with current amount of traffic, congestion at peak times - access onto Mansfield Road difficult - narrower than most A roads, it should be made into a B road</li> <li>• Knock-on effect of traffic on the A610 and the Ikea roundabout - busy</li> </ul>	<p>Issue of the principle of Green Belt review is addressed in the Core Strategy</p> <p>It remains a priority to bring forward brownfield sites and current information in the SHLAA is that some Green Belt release will be required</p> <p>Other issues raised will be considered in the Sustainability Appraisal and Infrastructure Development Plan before final decisions on site allocations are made</p>
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<b>Zone 11</b>		
<b>Public</b>		
<ul style="list-style-type: none"> <li>Floodplain, not suitable for development - existing residents suffer from flooding from brook exacerbated by surface water run-off</li> </ul>		Flood Risk will be considered in the Sustainability Appraisal before final decisions on site allocations are made
<b>Zone 13</b>		
<b>Developer / Landowner</b>		
4200 Taylor & Burrows Property	<ul style="list-style-type: none"> <li>Site as a whole is not well contained and would not round off the settlement</li> <li>Smaller areas of Zone could be released that would round off of the settlement and be contained and bound by two sides by existing development. E.g., land to the north west of the Wade Printers site - bound by existing development on Main Street, and would form a natural infill without constituting urban sprawl</li> </ul>	Zone 13 is not recommended to be released for development
<b>Public</b>		
<ul style="list-style-type: none"> <li>Brownfield sites are available and should be use first</li> </ul>		There is already a priority to develop brownfield sites but some Green Belt release will be needed based on current information in the SHLAA
<b>Zone 14</b>		
<b>Developer / Landowner</b>		
4200 Taylor & Burrows Property	<ul style="list-style-type: none"> <li>Issue of merging could be addressed by developing in-line with the existing dwelling on South Street which would naturally round off settlement boundary and would not lead to coalescence</li> <li>No current defensible boundary – strong boundary could be provided through development</li> <li>Site was previously tipped in the 1830's with colliery shale. Utilised as a corporate event activity centre - undulating as land levels have been altered - there are number of structures including shelters, cabins and containers – considered inappropriate development within the green belt</li> <li>Redevelopment of previously developed land within the urban boundary and provides reclamation of the former pit site within the Green Belt</li> </ul>	<p>Detailed boundaries will be considered once all available information including the Sustainability Appraisal is complete</p> <p>Zones to the East of Eastwood are not considered to be as suitable for development as locations to the North of the town</p>
<b>Public</b>		
1805 Hutchinson N	<ul style="list-style-type: none"> <li>Strategic barrier between Giltbrook and Kimberley which should be retained in the Green Belt</li> </ul>	Noted
<b>Alternative Site</b>		
<b>Developer / Landowner</b>		

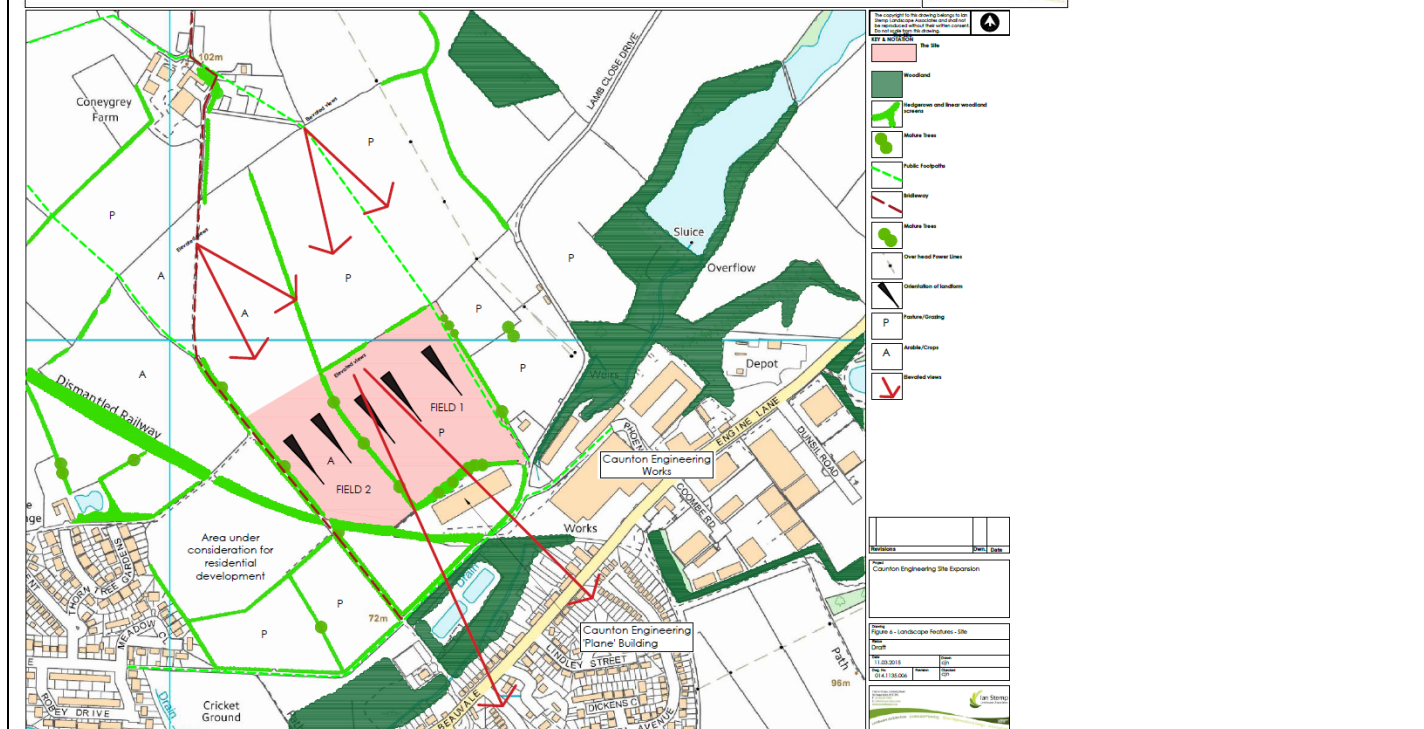
4200 Taylor  
& Burrows  
Property

- More detailed and robust assessment should be undertaken of the impact of specific sites in the Green Belt
- Detailed Masterplan demonstrates site can be developed without impacting upon the 5 purposes of the Green Belt

Agreed regarding specific assessment and they will be used to inform final decisions on site allocations



178 Caunton Engineering Ltd	<ul style="list-style-type: none"> <li>• Expansion requirements of the company to increase its trailer storage facility for manufactured steel components prior to their distribution to site</li> <li>• Need to identify an area of land suitable for it to undertake the temporary trial pre-construction erection of the fabricated steel frameworks - necessary to facilitate just-in-time methods of large-scale construction projects</li> <li>• Working with the topography of the site and incorporating landscape enhancements objectives of the Greenwood Community Forest are supported, and visual appearance of the urban edge will be enhanced.</li> <li>• No consideration of the need for land to assist existing companies that provides considerable employment and economic benefit to the Borough</li> <li>• Site bordered by existing Engineering works and is distinctly urban edge dominated by the Plane Building, a large industrial shed. Development of Zone 10 means this site will also be bordered by housing developments</li> <li>• Site contained by mature hedgerows on its northern, eastern and western boundaries which all create defensible boundaries, ridgeline north of the site also creates physical separation from surrounding countryside</li> </ul> <p>Proposed re-score: 6. - Check the unrestricted sprawl of settlements; 2 points, Prevent neighbouring settlements from merging into one another; 1 point, Assist in safeguarding the countryside from encroachment; 2 point, Preserve the setting and special character of historic settlements. 1 point</p>	<p>Report submitted refers to the ability to remove the site from the Green Belt for development based on landscape and amenity grounds</p> <p>This will be assessed as part of the detailed site allocations process</p>
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## Public suggestion to alternative boundary change

3172 Housley A	<ul style="list-style-type: none"> <li>The bridal path Willey land should remain the demarcation between Eastwood and the Green Belt</li> </ul>	Decisions on site boundaries and allocations will be taken as part of the detailed site allocation process
5829 Housley L		
5932 Housley J		
6178 Poxon A	<ul style="list-style-type: none"> <li>Keep fields to the left hand side of bridle path as you enter from Mansfield Road</li> <li>Fields on right hand side of bridle path adjoining Coach</li> </ul>	

	<p>Drive would be a natural extension of the urban area with the bridle path and fields beyond being the natural defensible boundary</p> <ul style="list-style-type: none"><li>• SHLAA ref 514 could be used for housing</li><li>• Further up on same side of road as 514 – Green Belt – but less impact on openness of the countryside</li><li>• SHLAA 256 &amp; 413</li></ul>	
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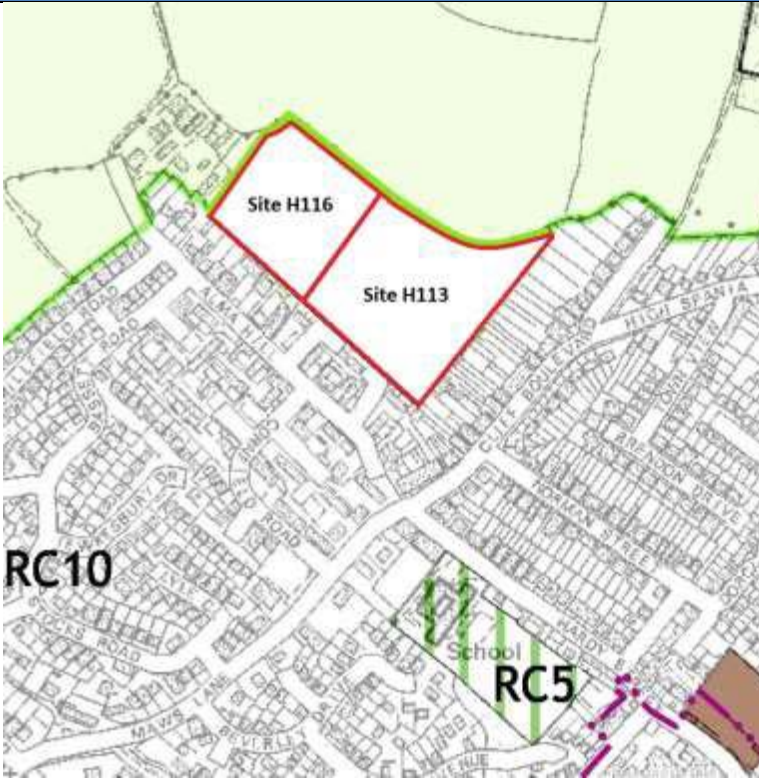
## Kimberley

Who	Comment	Broxtowe Borough Council Comments
<b>Zone 15</b>		
<b>Land Owner/Developer</b>		
2542 Viitanen D	<ul style="list-style-type: none"> <li>Gilt Hill Farm site is suitable and deliverable and should be removed from the Green Belt and allocated for development - does not contribute to the 'openness of the Green Belt'</li> <li>There is a clear differentiation between the built form at Gilt Hill Farm and area immediately surrounding compared to the rest of the zone 15</li> <li>Main area promoted for development contains significant buildings (a number of large agricultural buildings), external storage (of plant and machinery) and hard standing and is therefore not 'open' and development of the site would not cause significant encroachment because of the existing buildings, which are large and very visible in the context of the area between Eastwood and Kimberley</li> <li>Ignores potential benefits in terms of open space provision (a country park) and provision of defensible boundary</li> <li>The country park would create a 'soft edge' to development and would enhance the relationship between buildings, open space and public access</li> <li>Situated on the urban edge of Kimberley and is bounded by a primary school to the East and Gilt Hill Road to the South</li> <li>Site is situated close to the Giltbrook Retail Park and the proximity has been ignored</li> <li>Area is a desirable location for development</li> <li>Retirement village could provide approximately 150 units for people over the age of 55 – should be treated as a 'special case'</li> </ul>	<p>They argue that the gap would not be significantly reduced – they have come to this conclusion as they are assessing this against the narrowest part of the gap</p> <p>Decisions on site boundaries and allocations will be taken as part of the detailed site allocation process</p>
<b>Public</b>		
5844 Versteg D	<ul style="list-style-type: none"> <li>Zone should not be considered for housing or development</li> <li>Important boundary between Kimberley and Giltbrook</li> <li>No suitable access roads</li> <li>Traffic would worsen considerably</li> </ul>	Noted

<b>Zone 16</b>		
<b>Landowner / Developer</b>		
1501 The Wild Family	<ul style="list-style-type: none"> <li>Extent of the zone has not been adequately explained or justified</li> <li>Should have assessed smaller components of zone 2004 Inspector recommended sites H113 and H116 be removed from Green Belt</li> </ul>	Decisions on site boundaries and allocations will be taken as part of the detailed site allocation process
1436 The Evans Family	<ul style="list-style-type: none"> <li>Extent of the zone has not been adequately explained or justified</li> <li>Zone is not clearly defined - absence of defined settlement boundaries makes it difficult to consider the impact</li> <li>Fails to analyse the component parts of the zone - overall conclusion on an all or nothing basis - 2004 Inspector recommended sites H113 and H116 be removed from Green Belt</li> <li>Parcels of land closest to the existing built-up area that comprised a logical extension/rounding-off with minimal impact on the openness of the Green Belt and the five purposes</li> <li>Sites previously recommended for removal from the Green Belt will be excluded from next stage of consultation</li> </ul>	Decisions on site boundaries and allocations will be taken as part of the detailed site allocation process
<b>Zone 17</b>		
<b>Landowner / Developer</b>		
331 Barratt Homes	<ul style="list-style-type: none"> <li>Is Watnall Road included within the description "East of Main Road"?</li> <li>Areas east of Watnall Road (on edge of New Nuthall) are 'urban fringe' - score too negative</li> </ul>	<p>Yes</p> <p>The Green Belt is considered to accurately assess different zones against the purposes of including land in the Green Belt</p>
<b>Zone 20</b>		
<b>Public Interest Group</b>		
18 Nottingham CPRE	<ul style="list-style-type: none"> <li>Other zones around Kimberley may have greater detrimental impact – however reservations about allocating Zone 20</li> <li>Impact on a mature landscape area and on conservation area</li> <li>Mature hedgerows would need to be maintained</li> <li>Concerned about visual impact of development due to topography</li> <li>Long-distance footpath would need to be</li> </ul>	<p>Noted</p> <p>Other issues raised will be considered in the Sustainability Appraisal and Infrastructure Development Plan before final decisions on site allocations are made</p>

	rerouted in a way which maintains the connectivity of the Nottinghamshire footpath network	
2548 Park and Environment (Broxtowe Borough Council)	<ul style="list-style-type: none"> <li>• Need to preserve and enhance A610 corridor</li> <li>• May be scope for wetland creation</li> <li>• Important rights of way to consider</li> </ul>	<p>Noted</p> <p>Other issues raised will be considered in the Sustainability Appraisal and Infrastructure Development Plan before final decisions on site allocations are made</p>
<b>Land Owner/ Developer</b>		
1501 The Wild Family	<ul style="list-style-type: none"> <li>• extent of zone purposefully and unfairly determined to favour site over others</li> <li>• Site is “hilly” – therefore prominent – should have higher score for sprawl</li> <li>• Perception of bringing one settlement closer to another will be most apparent to users of the A610</li> <li>• Proximity of the Conservation Area - impact on Conservation Area cannot be determined without Heritage Impact Assessment</li> <li>• A610 will constrain the efficient development of this site – i.e. from noise, air quality and access standpoints – other constraints will reduce the developable area of the zone</li> <li>• Number of smaller sites would improve the ability to deliver housing in Kimberley</li> <li>• There are more suitable sites that would, individually or collectively have less impact of the openness on the Green Belt and the purposes of including land within it e.g. sites H113 and H116; and H112</li> <li>• Not all of Zone 20 is developable, or indeed required to be developed to meet the housing land requirements identified in the Adopted Core Strategy - cannot possibly constitute ‘exceptional circumstances’</li> <li>• Plan lacks the necessary flexibility should sites fail to come forward as anticipated – sites (not zones) should be assessed - ‘safeguarded land’ should be identified – site 215 is available if required</li> </ul>	<p>The Green Belt review is considered to accurately assess different zones against the purposes of including land in the Green Belt</p> <p>Decisions on site boundaries and allocations will be taken as part of the detailed site allocation process</p>
1436 The Evans Family		
331 Barratt Homes	<ul style="list-style-type: none"> <li>• Questions deliverability of housing at this location given issues surrounding access/highways, noise and air quality</li> </ul>	<p>Other issues raised will be considered in the Sustainability Appraisal and Infrastructure Development Plan before final decisions on site allocations are made</p>

Councillor		
1601 Cllr A Cooper	<ul style="list-style-type: none"> <li>• Possible impact on the Conservation Area</li> <li>• Development on majority of site not desirable because of access on narrow high street rear of Dawver Road, Dale Road, Lancery Close</li> </ul>	Other issues raised will be considered in the Sustainability Appraisal and Infrastructure Development Plan before final decisions on site allocations are made
Public		
2578 Page S	<ul style="list-style-type: none"> <li>• A610 would prevent merging of settlements.</li> <li>• Noise from A610 needs to be taken into account – potential re-surfacing the road and the construction of noise barriers</li> <li>• Consider including natural flood defences to reduce flood risk</li> <li>• Road access issues need to be solved</li> <li>• Least damaging proposal to the Green Belt</li> </ul>	Noted
3580 Munton L 4621 Plumb R	<p>Green Belt:</p> <ul style="list-style-type: none"> <li>• Only piece of Green Belt/green space this side of Kimberley without having to cross the A610 – it is greatly valued</li> <li>• Green belt incursion totally inappropriate</li> </ul> <p>Traffic and Transport:</p> <ul style="list-style-type: none"> <li>• Noise pollution from A610 – issue for residents amenity</li> <li>• Congestion problems on the Nottingham – Eastwood Road.</li> <li>• Church Hill and High Street are narrow and in poor state of repair -access and egress to site a concern</li> <li>• Traffic in Kimberley town centre would get worse - roads regularly gridlocked</li> </ul> <p>Wildlife:</p> <ul style="list-style-type: none"> <li>• Abundance of wildlife within site</li> </ul> <p>Flooding and drainage issues:</p> <ul style="list-style-type: none"> <li>• Underground springs could be disturbed and flood main road</li> </ul> <p>Local Infrastructure:</p> <ul style="list-style-type: none"> <li>• Road infrastructure and local schools cannot support any more residents</li> <li>• Already have difficulty getting an appointment at doctors surgery – new one needed</li> </ul> <p>Other Issues:</p> <ul style="list-style-type: none"> <li>• 600 houses in Kimberley is spurious and 100 spread around the town would be more sensible - Kimberley is large enough</li> <li>• Every available brownfield site nationally should be used first including the old Cussons Soap</li> </ul>	Other issues raised will be considered in the Sustainability Appraisal and Infrastructure Development Plan before final decisions on site allocations are made

	<p>Factory on Wilkinson Street and Basford Gas Works</p> <ul style="list-style-type: none"> <li>There is significant development included in the Brewery plans</li> </ul>	
<b>Zone 21</b>		
1501 The Wild Family	<ul style="list-style-type: none"> <li>the extent of the zone has not been adequately explained or justified</li> <li>Fails to analyse the component parts of the zone –doesn't recognise merits of more logical smaller parcels of land e.g. land to the south of Spring Hill</li> </ul>	Smaller areas can and will be considered as part of the site allocations process
<b>Alternative Boundary</b>		
<p>1501 The Wild Family</p> <p>1436 The Evans Family</p>	 <ul style="list-style-type: none"> <li>Proposed boundary change comprises a more effective use of Green Belt land and responds to amount of housing land actually required</li> <li>Site H116 is suitable and available and could be delivered in conjunction with the adjacent site H11</li> <li>Site H116 &amp; 113 benefit from the same physical advantages and lacks any identified constraints</li> <li>2004 Local Plan Review the Inspector recommended that sites H116 and H113 be removed from the Green Belt – stated that site is of very limited value to the purposes of the Green Belt - just as pertinent today</li> <li>Allocation of the two sites would represent a logical 'rounding-off' of the settlement, suitably contained by existing development and the</li> </ul>	<p>Other issues raised will be considered in the Sustainability Appraisal and Infrastructure Development Plan before final decisions on site allocations are made</p> <p>This area is not considered to be preferable for release from the Green Belt to some areas inside the A610 at the South of the town</p>

	robust ridgeline and well established hedgerow to the north	
2542 Viitanen D	<ul style="list-style-type: none"> <li>Site ideal location for retirement village which could also include the provision of sports pitches (Cricket) and Country Park</li> <li>Gilt Hill Farm site is suitable and deliverable and should be removed from the Green Belt</li> </ul>	<p>Other issues raised will be considered in the Sustainability Appraisal and Infrastructure Development Plan before final decisions on site allocations are made</p> <p>This area is not considered to be preferable for release from the Green Belt to some areas inside the A610 at the South of the town</p>



331 Barratt Homes	<ul style="list-style-type: none"> <li>• Consideration should be given to SHLAA Site Ref 105 (Land West of New Farm Lane, Nuthall) given its well defined boundaries - based on sustainability credentials with minimal impact on the surrounding Green Belt</li> <li>• Access issues have been "addressed" and there is no "Highways Infrastructure Constraint"</li> </ul>	<p>Other issues raised will be considered in the Sustainability Appraisal and Infrastructure Development Plan before final decisions on site allocations are made</p> <p>This area is not considered to be preferable for release from the Green Belt to some areas inside the A610 at the South of the town</p>
3580 Munton L	<ul style="list-style-type: none"> <li>• New building on Green Belt in Kimberley should be either to the North or East of the town to give traffic an alternative route</li> </ul>	<p>Other issues raised will be considered in the Sustainability Appraisal and Infrastructure Development Plan before final decisions on site allocations are made</p> <p>This area is not considered to be preferable for release from the Green Belt to some areas inside the A610 at the South of the town</p>

## Main Built Up Area

Who	Comment	Broxtowe Borough Council Comments
<b>Zone 22</b>		
<b>Landowner / Developer</b>		
5915 Glenn I	<ul style="list-style-type: none"> <li>• SHLAA site 513 within zone 22 does not fulfil the five purposes of the green belt. Considered in isolation, site 513 is bordered only on one side by existing housing however: considered in conjunction with other Ashfield housing sites land is bordered on two or three sides by housing. The fourth side has strong defensible boundary of Starth Wood, 15 acres of ancient woodland protected by a blanket Tree Preservation Order and an ancient hedge line and brook</li> <li>• Site 513 and Hucknall site 4 (by surface water attenuation) could solve historic flood problems on the B6009 at Watnall Road/Long Lane - a number of accidents that have occurred as a result of flooding</li> <li>• Hucknall site 4 cannot be developed by any means other than access across site 513</li> <li>• All utility services are available to site</li> <li>• Could be built out within five years of obtaining a planning consent</li> <li>• Additional land adjacent to site 513, in Broxtowe, could also be made available if required</li> </ul>	This area is adjacent to Hucknall which is not a location listed for development in policy 2 of the Core Strategy
<b>Zone 24:</b>		
<b>Landowner / Developer</b>		
2685 Bloor Homes	<ul style="list-style-type: none"> <li>• Assessment wrong and inconsistent</li> <li>• Strongly influenced by built form on all sides, with built development and the M1 motorway having strong urbanising effect - scoring for urban sprawl and countryside encroachment should be 1, not 3</li> <li>• Gap between Nottingham and Kimberley not perceived on the ground to the same extent (as on plan) given ribbon development along Nottingham Road</li> <li>• M1 acts as a strong impenetrable barrier (other than along Nottingham Road) and provides a permanent separation of Kimberley and Nottingham</li> <li>• Sensitive development would not result in merging of settlements - should score less</li> <li>• Potential location for the route of an extension to the Nottingham tram - should be major consideration - area should be safeguarded for development</li> </ul>	<p>The Green Belt review is considered to accurately assess different zones against the purposes of including land in the Green Belt</p> <p>In addition this is one of the most sensitive Green Belt gaps between Greater Nottingham and the built up area of Nottingham</p>

**Zone 25:**

4199 Nuthall  
Nottingham LLP  
and Severn Trust

- Land west of Woodhouse Way (forming part of Zone 25) most sustainable option for development after Field Farm and Toton - should be allocated or safeguarded for at least 300 dwellings
- (SHLAA ref 107 & 42) should have been assessed individually – physically separated and assessed differently in the SHLAA
- 107 visually and physically isolated from Nuthall/Kimberley by the M1 and A610 - separation would be further reinforced through the HS2 railway line (which would act as defensible boundary)
- Tribal report assessed site H107 as “amber” - meeting two out of three criteria
- site is “deliverable”
- 2003 Local Plan Inspector concluded development could lead to “encroachment” and “coalescence” (hence “amber” rather than “green”) - however, circumstances have changed significantly (to justify exceptional circumstances) - need for housing, development at Nottingham Business Park and HS2 route
- Site would assist in delivering urban concentration and regeneration
- Small number of public comments to Outline planning application
- At least two thirds of site will be accessible open space - large part of the site will be publicly accessible “open” land

Scoring for Site H107 should actually be as follows:

Purpose/Impact	Score/Assessment	Comment
Check the unrestricted sprawl of settlements	★	• The site is well contained on all sides by permanent or readily recognisable physical boundaries (and would retain a green wedge on land to the west). If the HS2 route is confirmed this would provide the western boundary.
Prevent neighbouring settlements from merging into one another	★★	• The development would result in a moderate reduction in the size of the gap between Kimberley and Nottingham, albeit this would all be contained by Junction 26 of the M1.
Assist in safeguarding the countryside from encroachment	★★★★	• The site does not have any inappropriate developments and therefore no encroachment.
Preserve the setting and special character of historic settlements	★	• Development will have no adverse impacts on conservation areas or other heritage assets, as confirmed in the “Archaeology and Heritage Assets” Chapter of the 2013 Environmental Statement supporting the outline planning application for the site.
<b>Total</b>	<b>9</b>	

- Would score the same as other preferred sites

The Green Belt review is considered to accurately assess different zones against the purposes of including land in the Green Belt

In addition this is one of the most sensitive Green Belt gaps between Greater Nottingham and the built up area of Nottingham



647 Gaintaime  
Ltd

- Zone 25 is contains two distinctly visually and physically separate sites - should be assessed separately
- Northern part of zone 25 (SHLAA ref 421) promoted for low density Retirement Village
- Site could be released without undermining the purpose of the green belt
- Well contained - bound by the A610, M1 and existing built form along Nottingham Road - agree with urban sprawl assessment
- Site 421 can be developed to retain open breaks that ensure that merger of settlements is avoided
- HS2 along the western boundary would undermine the importance of this site in terms of its openness - HS2 line and M1 provide a more defensible boundary
- Site includes a significant amount of inappropriate development - development would not encroach into open countryside – development in isolation would not lead to coalescence
- Nuthall Conservation Area to west of the site includes a number of listed buildings - however M1 has a severing effect – thus development would have a limited impact
- Corporate Plan to support and encourage new retirement village - will provide extra community and leisure facilities and new employment opportunities to wider community

The Green Belt review is considered to accurately assess different zones against the purposes of including land in the Green Belt

In addition this is one of the most sensitive Green Belt gaps between Greater Nottingham and the built up area of Nottingham

**Zone 27**

3634 Crown Estate

- Largest zone in Green Belt Review - varying landscape characteristics and topography - assessing as a single parcel of land is too broad brush
- Available within the next five years or medium term as safeguarded land
- SHLAA site 588 - adjacent to the edge of Nottingham (capacity c. 300 dwellings) is sustainable location - within walking distance to services and infrastructure, employment opportunities within close proximity, two local bus services. Accessible to Junction 26 of the M1, development could be served directly off A6002
- Well contained on lower ground to the east of the Catstone Hill Ridge, mature screening to west and south, and built development to north (Strelley) and east (Bilborough) provides permanent and defensible boundaries
- Would represent a more discrete release from the Green Belt - distance between site and Ilkeston is circa 3.5km (at its nearest point)
- Some inappropriate development, including man-made reservoir. To the north there is new development
- Assessment identifies moderate adverse impact on setting and special character of historic settlements - premature in advance of detailed scheme

Have used our assessment score for the wider zone (particularly for inappropriate development) where the score would be worse if based on their own parcel of land

In addition this is one of the most sensitive Green Belt gaps between Greater Nottingham and the built up area of Nottingham



616 Trowell Parish Council

- Strongly object to any encroachment into the existing Green Belt boundaries of the Parish of Trowell

No encroachment is proposed

**Zone 28**

616 Trowell Parish Council

- Strongly object to any encroachment into the existing Green Belt boundaries of the Parish of Trowell

No encroachment is proposed

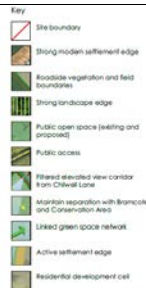
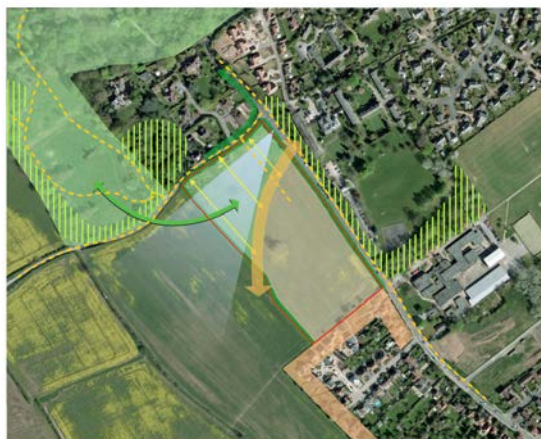
Zone 32		
Public Interest Group		
2548 Park and Environment (Broxtowe Borough Council)	<ul style="list-style-type: none"> <li>Logical but some reservations - Bramcote Park, Stapleford Hill and the Crematorium have direct connection to open countryside - connections need to be maintained</li> <li>Land at Pit Lane currently used as open space is proposed for a Local Nature Reserve</li> </ul>	Green routes/ wildlife corridors will be important for the detailed allocations process
616 Trowell Parish Council	<ul style="list-style-type: none"> <li>Strongly object to any encroachment into the existing Green Belt boundaries of the Parish of Trowell</li> </ul>	No encroachment is proposed
Public		
<p>Green Belt:</p> <ul style="list-style-type: none"> <li>Bramcote, Stapleford, Toton, Trowell, Sandiacre, Nottingham and Chilwell will merge and lose their identity</li> <li>Important gap between Trowell and Stapleford</li> <li>Contradicts policy aimed at preventing neighbouring towns from merging and urban sprawl</li> <li>Should only be altered in exceptional circumstances - no justification for this</li> </ul> <p>Flood Risk:</p> <ul style="list-style-type: none"> <li>Boundary Brook is liable to flooding along its route to the River Erewash - Brook is narrow and cannot take extra water</li> </ul> <p>Wildlife:</p> <ul style="list-style-type: none"> <li>The part adjoining railway should remain as a wildlife corridor (as per STRAG submission) - development would sever wildlife corridor</li> </ul> <p>Other Issues:</p> <ul style="list-style-type: none"> <li>Green Belt is important asset for local residents and is used for recreational space</li> <li>Loss of open land in the area</li> <li>Does not preserve the setting and special character of the area</li> <li>If its removed from the Green Belt even if it's not built on now it will always be vulnerable</li> <li>Development will adversely affect property values</li> <li>Area provides essential green space for impending Field Farm development</li> </ul>		<p>Principle of Green Belt review is addressed in the Core Strategy</p> <p>Zone 32 is land proposed to be gifted to Trowell Parish Council</p> <p>Other issues raised will be considered in the Sustainability Appraisal and Infrastructure Development Plan before final decisions on site allocations are made</p>
Zone 33		
Public Interest Group		
34 Nottinghamshire Wildlife Trust	<ul style="list-style-type: none"> <li>Majority of zones potentially impact on wildlife sites (LWSs and LNRs)</li> <li>Moorbridge Lane Wet Grasslands - appears entire Local Wildlife Sites could be removed from Green Belt</li> </ul>	No suggestion of built development on protected wildlife sites
60 Erewash Borough Council	<ul style="list-style-type: none"> <li>Zone broadly flanks the western fringes of Stapleford</li> <li>Close proximity between the land under review inside Broxtowe and a number of urban areas (in Erewash) situated west of the River Erewash</li> <li>Noted than no release of Green Belt land within zone is</li> </ul>	Noted

	required	
616 Trowell Parish Council	<ul style="list-style-type: none"> <li>Strongly object to any encroachment into the existing Green Belt boundaries of the Parish of Trowell</li> </ul>	No encroachment is proposed
<b>Public</b>		
	<ul style="list-style-type: none"> <li>No Green Belt Land should be built on – our country is being destroyed</li> <li>There is another way - not always the easiest/cheapest</li> </ul>	Principle of Green Belt review is addressed in the Core Strategy
<b>Zone 35</b>		
<p>The site has four distinct boundaries:</p> <ol style="list-style-type: none"> <li>1. The flood bank</li> <li>2. Gardens relating to properties on Lower Park Street</li> <li>3. Gardens relating to properties on Park Street</li> <li>4. A grass crete road installed by Seven Trent Water to access the sewage pumping station sites beyond the my land and is in effect a continuation of Sandiacre Road</li> </ol> <p>The land if removed from the Green Belt would be ideally suited to either starter homes or homes for the elderly. The site benefits from very easy flat access to Stapleford with the main thoroughfare Derby Road being approximately 200 metres away.</p>		On Green Belt grounds it is considered that the assessment accurately assess this zone
<b>Zone 36</b>		
2685 Bloor Homes	<ul style="list-style-type: none"> <li>Misleading, inflexible, too blunt and unsubtle an approach - Zone should be subdivided into smaller areas to be assessed separately</li> <li>'Central' ridge-line performs a function in Green Belt and visual impact terms - different to those parts to north and south</li> <li>Assessment mixes 'Zone' and 'Site'</li> <li>Smaller 'sites' at Baulk Lane, Hill Top Farm itself and Sisley Avenue "perform" differently from the central ridge and should be judged accordingly</li> </ul>	Smaller areas can and will be considered as part of the site allocations process
73 Stapleford Town Council	<ul style="list-style-type: none"> <li>Concern re: area adjacent to Sisley Avenue/Baulk Lane/Coventry Lane - should be retained in the green belt</li> </ul>	Other issues raised will be considered in the Sustainability Appraisal and Infrastructure Development Plan before final decisions on site allocations are made
<b>Public</b>		

<p>National Policy:</p> <ul style="list-style-type: none"> <li>Unmet housing need unlikely to outweigh harm to justifying inappropriate development in the Green Belt</li> </ul> <p>Scoring System:</p> <ul style="list-style-type: none"> <li>Scoring matrix has missing information which makes it harder to argue about the scores given to any particular zone</li> </ul> <p>Green Belt:</p> <ul style="list-style-type: none"> <li>Boundary change would not 'round off' existing settlement</li> <li>Where limited Green Belt left it becomes more valuable as a local amenity</li> <li>Site extends over a ridge which constitutes a topographical feature - Urban sprawl would be exacerbated because of topography</li> <li>Brownfield land should be re-used ahead of Green Belt land</li> <li>Policy RC16 from the 2004 Local Plan should be consideration</li> <li>Development would reduce gap between Stapleford Chilwell and Bramcote - Perception of the reduction of the gap should result in a higher score</li> <li>One telecoms mast does not affect the openness of the Green Belt and the bridle path/track is not inappropriate development - Encroachment should score higher</li> <li>Not 'undeveloped agricultural land' - has been used to grow food crops for the last 30 years</li> <li>Building would have significant adverse impact on one or more conservation areas</li> </ul> <p>Other Issues:</p> <ul style="list-style-type: none"> <li>Issues regarding access to facilities are not included in assessments or criteria</li> <li>Building houses on the Green Belt does not provide growth - Engineering and technical workshops for HS2 (if it comes) would provide growth</li> <li>Baulk Lane unable to cope with extra traffic</li> </ul>		<p>Many of these points are either addressed in the Core Strategy (housing need) or are detailed site selection matters not covered in this Green Belt Review</p> <p>On Green Belt grounds it is considered that the assessment accurately assess this zone</p>
<b>Zone 37</b>		
<b>Land Owners / Developers</b>		
412 Persimmon Homes North Midlands	<ul style="list-style-type: none"> <li>Broadly correlates with Prominent Area for Special Protection, Mature Landscape Area, and Bramcote Conservation Area - prominence and topography would make it wholly unsuitable - would do little in safeguarding the countryside from encroachment</li> <li>A52 provides a physical boundary to eastern edge of Stapleford - breaching this will dilute well-defined and robust edge to Stapleford</li> </ul>	Site specific comments will be included in the in the allocations process
<b>Public</b>		
	<ul style="list-style-type: none"> <li>Area contains King George's Park</li> <li>Building houses on the Green Belt does not provide growth - Engineering and technical workshops for HS2 (if it comes) would provide growth</li> </ul>	Site specific comments will be included in the in the allocations process
<b>Zone 38</b>		
<b>Land Owners / Developers</b>		
2685 Bloor Homes	<ul style="list-style-type: none"> <li>Score 3 for urban sprawl despite distances between existing urban features is almost identical to 41</li> </ul>	Zone 41 has many more urbanising

<p>2652 W Westerman Ltd</p>	<ul style="list-style-type: none"> <li>• Conclusions of potential impact are inconsistent and inflexible</li> <li>• No subtlety or disaggregation of components, and the judgements are wrong</li> <li>• Parts of Zone 38 and 39 should be combined and assessed separately -zone could follow the line of built development from parts of Stapleford to parts of Chilwell -would score differently given the closer relationship to existing urban form, extent of existing urban features and the limited landscape and topographical constraints - new zone would be capable of providing a new defensible Green Belt boundary at least as strong as the new tram line (which is not considered a strong, permanent and defensible boundary)</li> <li>• Current scoring directly influenced by the most sensitive Green Belt areas to the north</li> </ul>	<p>features</p> <p>The Green Belt review is considered to accurately assess different zones against the purposes of including land in the Green Belt</p> <p>Decisions on site boundaries and allocations will be taken as part of the detailed site allocation process</p>
<p>412 Persimmon Homes North Midlands</p>	<ul style="list-style-type: none"> <li>• Green Belt review should have included character and appearance of the landscape</li> <li>• Size of zone considered will result in a higher degree of encroachment and reduction on open land separating each of the surrounding settlement.</li> <li>• Not clear whether this Green Belt Review forms part of the Assessment 1 or Assessment 2 stages. Ridgeline extending between The Curragh and Great Hoggett Drive separates zone into two distinct areas of land</li> <li>• Landform associated with this part of the Green Belt is particularly distinct, creating both a prominent landscape feature, and providing visual separation</li> <li>• North of Common Lane is constrained both through landscape designation and its topography - elevated open ridgeline defined by the wooded setting of Burnt Hill - broad and far reaching views from the ridge</li> <li>• Ridgeline extends between The Curragh and Great Hoggett Drive - settlement is prominent in landscape - development in this location would be prominent and is likely to affect a number of landscape and cultural heritage designations</li> <li>• A52 secures a robust and un-breeched well-defined boundary to Stapleford - helps maintain open character of the farmland to the east that has a limited relationship with the wider settlement to west</li> <li>• Secondary highway boundaries (e.g. bridleways) that follow landscape features (e.g. hedgerows) are more distinct and stronger than other boundaries (e.g. tramline) by their permanent nature are robust and enduring</li> <li>• Tram terminus, park &amp; ride facility, tram lines and Bardills Garden Centre create intrusion within the Green Belt - can</li> </ul>	<p>The Green Belt review is considered to accurately assess different zones against the purposes of including land in the Green Belt</p> <p>Decisions on site boundaries and allocations will be taken as part of the detailed site allocation process</p> <p>Smaller areas can and will be considered as part of the site allocations process</p>

- help to define and contain development
- Existing public access network well defined and extensive - some restricted areas
- Generally well contained and/or set at the edge of the Green Belt on land that makes a more limited contribution to its open character
- Smaller area (adjacent to Chilwell Lane Bramcote) well defined by highways, settlement, and existing field boundaries - perceived edge of the Green Belt development would not appear a significant encroachment into Green Belt as not essential to open and undeveloped character
- Settlement of Chilwell and Bramcote are to a degree joined – development will secure permanent green space that will provide separation
- Does make a significant contribution to the open and undeveloped setting of farmland associated with Green Belt
- Site adjoins Conservation Area – development would reinforce landscape setting and enhance immediate landscape - unlikely development will result in significant harm
- Site is green field - unlikely housing requirement can be accommodated on brownfield land - sites like this will be required



## Public

- Area contains King George's Park
- Building houses on the Green Belt does not provide growth - Engineering and technical workshops for HS2 (if it comes) would provide growth

Site specific comments will be included in the in the allocations process

<b>Zone 43</b>		
<b>Public Interest Group</b>		
60 Erewash Borough Council	<ul style="list-style-type: none"> <li>Presence of River Erewash and lack of defences expose area to flooding – mitigation required if released for development</li> </ul>	Noted. No development proposed in this zone
<b>Public</b>		
	<ul style="list-style-type: none"> <li>Less costly to develop and assist in meeting the short term need more easily</li> </ul>	Site specific comments will be included in the in the allocations process
<b>Zone 44</b>		
<b>Public Interest Group</b>		
21 Natural England	<ul style="list-style-type: none"> <li>Contains two Sites of Special Scientific Interest (SSSI) – Bulwell Wood SSSI and Sellers Wood SSSI</li> <li>Development should avoid any activity that would damage or destroy the interest features of these SSSIs, including trampling or erosion damage as a result of increased visitor pressure</li> </ul>	Agree
60 Erewash Borough Council	<ul style="list-style-type: none"> <li>Contains Attenborough Nature Reserve, a prominent area of wetland with great ecological significance</li> <li>EBC fully agree with BBC's conclusion that any release of Green Belt for residential development would be inappropriate</li> </ul>	Noted
<b>Zone 48 &amp; 49</b>		
<b>Public Interest Group</b>		
60 Erewash Borough Council	<ul style="list-style-type: none"> <li>Located to the south-west of the settlement of Trowell, directly abutting Erewash - assessment acknowledges number of limiting factors which raise uncertainties as to the suitability of these broad locations to deliver future housing development</li> </ul>	Noted

## Bramcote/Stapleford

Who	Comment	Broxtowe Borough Council Comments
<b>Public Interest Groups</b>		
142 English Heritage (now Historic England)	<ul style="list-style-type: none"> <li>Assessment fails to take into consideration impacts upon designated heritage assets such as Bramcote Conservation Area</li> <li>Topography of area with the two hills – Stapleford Hill and Bramcote Hill, are significant landscape features</li> <li>Sites have some historic landscape interest with woodland planting</li> <li>Consider wider impacts relating to views from Wollaton Hall</li> <li>Scoring is incorrect for historic settlements and countryside encroachment (particularly from up the hills which has remained unaffected by development)</li> </ul>	<p>Bramcote and Stapleford Hill are not proposed to be developed</p> <p>Comments appear to be based on the incorrect assumption that they will be</p>
2548 Park and Environment (Broxtowe Borough Council)	<ul style="list-style-type: none"> <li>Logical but some reservations - Bramcote Park, Stapleford Hill and the Crematorium have direct connection to open countryside - connections need to be maintained – development (in zone 31) strongly threatens this connection and (in zone 30) would need careful consideration</li> <li>Land at Pit Lane (zone 32) currently open space is proposed for a Local Nature Reserve</li> </ul>	Noted
18 Nottingham CPRE	<ul style="list-style-type: none"> <li>Development would surround Stapleford Hill - sense of openness will be lost - recreational value of Stapleford Hill does includes how it fits into surrounding green space</li> <li>STRAG's proposal (for Field Farm site) includes wildlife strategy to enhance existing wildlife corridor - similar strategy should be developed for Green Infrastructure in whole area – allocating this Zone for development conflicts with such an approach</li> </ul>	<p>Wildlife Corridor issues will be important to the Plan of the area if development does take place</p> <p>It will be considered in the Sustainability Appraisal and Infrastructure Development Plan before final decisions on site allocations are made</p>
6052 Nottinghamshire County Council	<ul style="list-style-type: none"> <li>Boundary too superficial when considering Green Belt Criteria</li> <li>New boundary in this area should be based on a strong feature having regard to long term unforeseen development requirements and endure for long term e.g. 30 years</li> <li>Boundary should follow east-west railway line providing a proper long term physical definition</li> <li>Should be considered as part of the urban area but not necessarily identified for development</li> </ul>	Boundary is proposed to be the Railway line as they suggest

	<ul style="list-style-type: none"> <li>Urban spaces, playing fields etc. can be adequately protected by other policies – other land can be identified as safeguarded</li> </ul>	
<b>Landowner/Developer</b>		
1462 Messers Roberts	<ul style="list-style-type: none"> <li>Fully in favour of development</li> <li>Railway line is sensible defensible boundary</li> </ul>	Noted
6048 White Hills Park Federation Trust	<ul style="list-style-type: none"> <li>Zone 29 North of Bramcote Ridge/ Moor Lane up to the railway is the most suitable area for housing development</li> <li>Developing zone 29 would have the least impact on the community</li> <li>Railway line most suitable/rational boundary</li> <li>The Trust intends to sell excess land to raise funds for rebuilding and refurbishing the school –required to meet educational standards</li> </ul>	<p>Agree regarding the railway</p> <p>Zone 29 is an option for development and the review does not preclude this</p>
718 J McCann (Nottm) Ltd	<ul style="list-style-type: none"> <li>Difficult to see how Zone 31 has met more Green Belt criteria compared with other zones (specifically zone 40)</li> <li>Residential development approved to the west of the site</li> <li>Relatively small, isolated pocket of partially developed, part brownfield land, surrounded by urban structures and use - development is natural and logical extension to the settlement</li> <li>Site is well contained with the allocation of Field Farm to the West, the railway line forming a defensible boundary to the North, Stapleford Hill to the Southwest, and A6002 to the East</li> <li>Existing urban edge poorly defined and Green Belt boundary is weak and varied in its defining boundary features - land to the south disconnected and difficult to manage as agricultural</li> <li>Logical, enduring and clearly defensible boundaries would be established by an amendment to the railway line</li> <li>Development in this location would not constitute 'unrestricted sprawl' but a single and sustainable development project</li> <li>Parts of the Green Belt in the area between Nottingham and Derby and in the broader context that are more important in preventing the merging of towns or fragmentation of the Green Belt</li> <li>Development would not reduce any of the minimum widths of Green Belt to the surrounding towns and villages</li> </ul>	<p>Agree regarding the railway</p> <p>The Green Belt is considered to accurately assess different zones against the purposes of including land in the Green Belt</p> <p>Decisions on site boundaries and allocations will be taken as part of the detailed site allocation process</p>

	<ul style="list-style-type: none"> <li>• Development would maintain a break between Stapleford and Bramcote, because of its small size and its severance by the major road it contributes little to the separation</li> <li>• The perception of the gap between Bramcote and Stapleford would be similar to existing; and is the least sensitive in distance terms; it does little to contribute to the separate identity of Bramcote and Stapleford</li> <li>• Significant proportion is brownfield McCann depot site - urban and industrial in character - contributes little to the countryside</li> <li>• Stapleford not known to possess special character as a historic town - development would not prejudice or significantly impact upon the existing setting and character of the town - development would have no effect upon the setting and character of other settlements</li> <li>• NPPF refers to the setting and special character of historic towns, rather than specific heritage assets (re: Hemlock Stone) – site over 400 metres from the Hemlock Stone, with no inter-visibility between the two because of topography and woodland - no adverse impact</li> <li>• Site should score 5 stars in total</li> </ul>	
718 J McCann (Nottm) Ltd	<ul style="list-style-type: none"> <li>• Correct interpretation of national planning policy is a matter for the courts and that the Supreme Court nonetheless and planning judgement</li> <li>• ACS inspector stated that ‘the exceptional circumstances required for alterations to Green Belt boundaries exist.’</li> <li>• The need to achieve sustainable development is a statutory duty</li> <li>• The Bramcote and Stapleford amendment is consistent with the focus on urban concentration and is sustainably located to take advantage of the proximity to key services and public transport routes - Field Farm is a sustainable location therefore Bramcote and Stapleford cannot be considered differently</li> <li>• ‘Green Belt’ is a planning policy tool, not a measure of the quality or use of land - the area is urban fringe, and arguably contains no countryside land uses whatsoever- limited amount of land with secondary agricultural function - most serves needs of the urban area</li> <li>• Only 22% of the land in Bramcote/Stapleford</li> </ul>	Noted

	<p>amendment could be categorized as natural, with an equal amount comprising previously developed land. Other areas of 'open' land comprise restored former landfill, and formal sports pitches which have a bland and featureless appearance. Only 36% of the area is publically accessible</p>	
3634 Crown Estate	<ul style="list-style-type: none"> <li>• Zone 29 would result in a more than moderate reduction in the size of the gap between Bramcote and Stapleford – currently has no encroachment from inappropriate development - provides an extensive and prominent strategic Green Infrastructure Corridor linking Broxtowe and Nottingham - corridor should be retained</li> <li>• Considerable uncertainties over deliverability of housing within Zone 30</li> <li>• Land in multiple-ownership</li> <li>• Release and/or reconfiguration of land currently used for existing education, leisure and community uses will require extensive collaboration and agreement with a wide range of stakeholders</li> <li>• Discussions are yet to reach an advanced stage - potential to delay</li> <li>• Council's Leisure Provision Strategy identifies significant uncertainty over the quantum and location of future leisure centre provision - work is yet to be commissioned</li> <li>• Development in zone 31 would reduce the gap between Coventry Lane and Moor Lane to circa 300m at the closest point - significant harm in settlement coalescence – should not be released from the Green Belt</li> <li>• Additional/alternative Green Belt sites in or adjacent to the MBA will need to be considered</li> </ul>	<p>The Green Belt review is considered to accurately assess different zones against the purposes of including land in the Green Belt</p> <p>Green Infrastructure corridor can and will be retained in detailed allocations</p> <p>Other issues raised will be considered in the Sustainability Appraisal and Infrastructure Development Plan before final decisions on site allocations are made</p>
4199 Nuthall Nottingham LLP and Severn Trust	<ul style="list-style-type: none"> <li>• Site includes playing pitches and has not formally been proposed (in SHLAA or previous site allocations document) - no evidence base to justify deliverability/developability</li> <li>• Unclear why zone 29 is being proposed for potential release when it comprises an important strategic green infrastructure corridor – inappropriate for development</li> <li>• Grounds that residential development would enable the redevelopment of the existing school and leisure centre (zone 30) does not amount to "very special circumstances" –</li> </ul>	<p>The Green Belt review is considered to accurately assess different zones against the purposes of including land in the Green Belt</p> <p>Green Infrastructure corridor can and will be retained in detailed allocations</p> <p>Other issues raised will be considered in the Sustainability</p>

	<p>unsound approach</p> <ul style="list-style-type: none"> <li>Whilst Zone 31 could accommodate c.200 dwellings no evidence exists on the availability or suitability of Zone 30 to accommodate the shortfall (c.157 dwellings)</li> </ul>	Appraisal and Infrastructure Development Plan before final decisions on site allocations are made
<b>Local Council</b>		
73 Stapleford Town Council	<ul style="list-style-type: none"> <li>Concern that remaining green belt between Stapleford and Bramcote is being eroded - do not want further coalescence</li> <li>Important to maintain green belt between the separate settlements of Stapleford, Trowell, Bramcote and Toton, to maintain their separate identities</li> <li>Concern that Bramcote Hills Park had been included in the documentation - do not want any designated park areas in the Town and its vicinity developed for housing/commercial/industrial purposes</li> <li>The areas East of Field Farm/West of Field Farm, behind Bramcote Crematorium and proposals to develop land currently occupied by Bramcote School would need to be carefully managed to minimize the impact of any such development on the green belt area between Stapleford and Bramcote to ensure minimal loss of amenity</li> </ul>	No suggestion of developing Bramcote Hills Park or Stapleford Hill
<b>Public</b>		

## Green Belt:

- There is no requirement to redraw the Green Belt boundaries in this area - level of protection that Green Belt provides is vital
- Green Belt should only be amended in exceptional circumstances - no justification
- Bramcote, Stapleford, Toton, Trowell, Sandiacre, Nottingham and Chilwell will merge and lose their identity – currently prevents urban sprawl (in line with National Policy) - development would significantly change the character of the area
- Would not 'round off' the settlement
- Area already has strong physical boundaries (especially Moor Lane) so suggesting its removal would create strong physical boundaries is flawed
- Brownfield sites should be recycled first before Green Belt is used.
- If the boundary is moved to the railway line then the playing fields, the wooded area adjacent to the railway line and the scrub land which contains the public footpath should be designated as 'protected open space'
- Bramcote has already merged into Wollaton with no obvious gap and is already very built up – area forms an important buffer between Bramcote (including the Conservation Area) and Stapleford
- Green Belt has already been impacted by the release of Field Farm – this will increase pressure on remaining green spaces in the area - Field Farm should be added back into the Green Belt - there would be a continuation of the Green Belt to the North
- Why remove parts from the Green Belt if it's not suitable for development? - why so soon after the Core Strategy is more Green Belt release required?
- should be preserved for the amenity space of next generation –
- Balance is being tipped in favour of large developers
- Saying that the site has a large amount of inappropriate development is misleading – the school buildings and the leisure centre do not detract from the overall green character
- The report suggests that only a small portion of the Green Belt will be lost but the losses will be on the eastern part of the zone which are substantial and unwanted by local residents
- A52/Coventry Lane does not act as a strong defensible boundary as Bramcote is on both sides of the road. If both sides are developed then Bramcote and Stapleford will merge
- Moor Farm Inn road is a tiny road which does not extend across the entire zone and therefore should not be considered to be a potential boundary
- Purpose of green belt is to give people access to open countryside, provide recreation for urban population, retain attractive landscapes and secure nature conservation interests
- The assessment for 'preserve the setting and character of historic settlements should be higher because of the Hemlock Stone

Application to make the area a Village Green has been submitted to the County Council who are currently considering whether or not it should be accepted for consideration

The Green Belt review is considered to accurately assess different zones against the purposes of including land in the Green Belt

Other issues raised will be considered in the Sustainability Appraisal and Infrastructure Development Plan before final decisions on site allocations are made

- Disagree that this is a 'major developed site' as its largely undeveloped parkland
- Incorrect to state that the site has two boundaries with the urban area; Stapleford Hill (local Nature Reserve) is not suitable for development and part of Field Farm adjacent to site unlikely to be developed - Stapleford Hill represents better defensible boundary than railway
- Coventry Lane acts as a defensible barrier to the 'wash' of Green Belt and should not be compromised by further fragmentation
- Already no distinguishable gap between Bramcote and Wollaton – only crematorium that stops Bramcote and Stapleford from merging
- Zone is wholly defensible Green Belt bounded by railway line, Coventry Road, Mayfield Drive and Hemlock Stone Hill

#### Site Characteristics:

- Topography of the area means it is unsuitable for development
- Scrubland at southern end was (until the demise of the Bramcote Manor Pub) undisturbed open space containing a natural pond
- Wish to keep Bramcote Hills green
- No building should take place on open space along the ridge including any plans for the old golf course

#### Future Development:

- Building and further development will be inevitable – area not suitable for development
- Balance being tipped in favour of the large developers
- Concern about future development in the area including; open cast mining at Trowell and HS2 construction - will cause blight
- Expansion is far too excessive 125.9ha and will encourage further development in the future. If only 11.9 must be released there is no reason why a 91% excess to comply with natural boundaries
- The area will dramatically change and not for the better – changes all coming at once - will not preserve the setting and special character of the area

#### Wildlife:

- Development will sever the (already fragmented) wildlife corridor which runs from east and Wollaton Park out to open countryside – important that this is maintained – should be extended towards the old waste disposal site and towards the playing fields at the north and the wood at the south
- Former Golf Course has owls living on it
- Small mature woodland area between the fields and the railway line will be put in danger and should be protected
- Development will lead to increasing number of people and would lead to soil erosion and impact upon the ecosystem at Bramcote Hill/Wood
- Bio diverse plant and animal assembly resource
- Land forms important part of green infrastructure corridor as defined in the ACS policy 16

- Most important wildlife corridor in the area has already been lost (Field Farm)

## Heritage:

- Stapleford Hill, the Hemlock Stone and Bramcote Hill are locally important landmarks
- Area contains the hemlock stone – score for heritage too low as a result
- Increasing the number of people who live near the Hemlock stone could increase its likelihood of being damaged by visitors
- Hemlock Stone has been recreation area for centuries
- development would constitute visual intrusion and would impede the restoration of the view point from Bramcote Woods
- Hemlock Stone and Park have been deliberately included so they can be ruled out to show that you've listened to public feedback

## Recreation:

- Area is vital and valued community resource (typified by leisure and educational purposes) - important, convenient and easily accessible for wide range of exercise and leisure activities - obesity rates would increase in area developed - important for future generations
- Sports and community college when rebuilt will require the facilities in the area – local football teams should be encouraged to use the facilities
- Running track and open space only such facility in Bramcote - school last open space before the M1- extremely important area for formal and informal recreation and enhances quality of life for users
- Lots of people use the bridal path and the track to Common Lane
- It will be virtually impossible to walk to Bramcote Park from Moor Lane
- School and the leisure centre should work in partnership to maximise the use of the buildings currently on site
- Local play area at the bottom of road has seen better days and equipment not great
- Bramcote has very little open space - it should be preserved at all costs - Provides a tranquil space on the edge of a busy conurbation - Green Lungs enhance physical and mental health of existing residents
- Green Belt originally designated as a recreational resource
- There will be further pressure on the aging leisure centres – what are the plans for this?

## Flooding:

- Low lying area provides space for run-off water - development will reduce natural drainage
- Surface water flooding already an issue - field floods in heavy rain and over-runs the lane

## Traffic Issues:

- Residential development would increase the traffic on Moor Lane and Arundel Drive to an unacceptable level - current infrastructure can't cope with traffic noise and capacity -health impacts from increased pollution - roads will be impassable would delay emergency vehicles
- Cutting at Moor Lane not suited to more traffic as there are no pavements for pedestrians – Moor Lane is heavily congested at school drop-off and pick-up times – will be made worse
- Children block roads and stop people accessing private drives - more children will make situation worse - recent extension to Bramcote Hills Primary School has made the traffic situation worse
- Egress from Arundel drive has become more hazardous and time consuming - will be used as a rat run and turning circuit for westbound traffic
- Pedestrian access to and from bus stops, despite traffic lights, is dangerous for pedestrians and cars
- Coventry lane acts as a thoroughfare between this side of Broxtowe and the M1 junction 26 and beyond - development between Coventry Lane and Nuthall increased traffic – already too much traffic for size of road
- HS2 and possible re-aligning of M1 will have traffic impacts on area
- Transport links will have to be vastly improved if Green Belt land is to be redesigned

## School:

- Need for a new school is a red herring - Green Belt should not be changed purely so that the school can release funds for rebuilding - not a material planning consideration – redevelopment of school supported but should be within existing footprint (sufficient space if lower school demolished) and financed through alternative means – excess land should become formal open space as part of Bramcote Park
- Green Belt boundaries should not be amended unless no other option –not the case in terms of the school playing fields
- School buildings constitute appropriate buildings in the Green Belt - no reasons to change the boundary
- If school can justify building some affordable homes - Green Belt status should be approved in conjunction with this
- Council incompetent – school recently built - now unfit for purpose?
- Proposal to sell land by the White Hills Park Federation harder to manage if boundaries are changed
- Lack of school funding is a transient matter and loss of green space isn't - school would benefit more from being in parkland and green fields than it would from being in the built up area
- Developer of the school wants to build 30 houses which are likely to be retirement houses if the application at the golf course is refused

## Other Issues:

- Loss of open feel will be detrimental to existing residents and will adversely affect property values - reason why desirable area to live
- Area includes the canal and footpath to Trowell
- Green Belt review should have taken place prior to the adoption of the Core Strategy - further review required to include cross boarder collaboration
- The adjacent disused golf course should be brought under the control of the council or managed under Trust Status so that footpaths can be installed and grassland and woodland management can be carried out
- None of the zones between Trowell Moor and Toton should be removed from the Green Belt
- Area should be classed as a village green
- Housing allocation targets should be met by currently allocated sites within the ACS part 1 - contingency should be met by encouraging higher density development particularly in sustainable urban settlements – this would prevent the loss of Green Belt and Green Field sites and would encourage provision of more affordable homes
- Green Belt reviews every 2 years – not sufficiently long term
- Concern about noise, dust and disruption from building works taking place (will have an impact on the health of existing residents) - loss of privacy & views for existing residents –visual intrusion - overshadowing will cause damp problems in existing houses
- Increased infrastructure would be required – including additional primary school places as Bramcote Hills is presently at capacity and doctors’ surgery
- Future flight path for landing aircraft at EMA is over the area which will increase disturbance for residents
- Why have local football teams stopped using the facilities – this is a community asset
- National government should control population levels and this will solve housing crisis - quality of living should not be compromised by irresponsible actions of individuals
- Radical socialist political change is required to allocate housing to people rather than a market driven demand – cyclical problem that building more houses results in more people
- Building houses in Bramcote will attract middle class buyers who would be able to buy houses anyway – what is needed is social and affordable housing
- Development would impede removal of pollutants from the atmosphere - Greenery in the area acts as a sink for the carbon coming from the A52
- Should preserve areas where food is grown
- Broxtowe is already the most built up borough in the East

<ul style="list-style-type: none"> <li>• Too much jargon in document</li> <li>• Redevelopment of Foxwood and Bramcote Hills Primary schools must be considered in this project –extensively used by these schools for sports facilities</li> <li>• Development or relocation of Bramcote Leisure Centre should be included in the plans</li> <li>• Park &amp; Stapleford Hill are protected anyway and the quarry cannot be built on (filled land)</li> <li>• No clear plans so the public can see what is going to be built.</li> <li>• Recreation, countryside and community are bottom of the list of the Councils priorities</li> <li>• There is no room for development and so should remain in Green Belt</li> <li>• Small field has been left as a token gesture which neither Broxtowe nor Trowell want or can afford to look after</li> <li>• Photograph of the Hemlock Stone is looking over Coventry Lane from Bramcote Park and not from Coventry Lane</li> </ul>	
<b>Alternative boundaries</b>	
<p>Zone 29</p> <ul style="list-style-type: none"> <li>• Disagree that the whole of zone 29 should form part of the Green Infrastructure corridor and that it is unsuitable for development.</li> <li>• Part of zone 29 comprising of the recreational playing fields is relatively underused when compared to the usage of Bramcote Park and the additional land in zone 30 forming the running track and adjoining playing fields</li> <li>• Area has potential for vehicular access from Coventry Lane to the east and pedestrian access to the west from Moor Lane and from the Bramcote Moor estate</li> <li>• The playing fields are relatively flat in topography terms</li> <li>• Whilst detrimental to the wildlife corridor it could be suitable for the relocation of Bramcote school buildings - could enable part of Bramcote ridge currently (inappropriately developed) by Bramcote school buildings to be released back into the ridge as a nature reserve and enable improved continuity of the Green Infrastructure Corridor</li> <li>• Vehicular traffic from the school could approach via Coventry Lane – suggestion that pedestrian only access from Moor Lane easing existing traffic issues and surrounding roads - If access to new school was from Coventry Lane this could also provide access to small development at north of school</li> <li>• Residential properties could be provided on the existing school field accessed off Coventry lane</li> <li>• Zone 29 may have to be sacrificed if development is of high quality – would like retirement complex</li> <li>• Zone 29 could be developed providing that the wooded area and the canal; be kept as a wildlife corridor</li> <li>• Might be acceptable to build houses here but need to see the</li> </ul>	<p>Some think the school should be relocated here (freeing up existing school building area to become part of the park) – other recognise need for housing can be met here</p> <p>The Green Belt review is considered to accurately assess different zones against the purposes of including land in the Green Belt</p> <p>Decisions on site boundaries and allocations will be taken as part of the detailed site allocation process</p>

<p>plans from the developers first</p> <ul style="list-style-type: none"> <li>• Smaller area to the NE of Coventry Lane would be quite sufficient and link better with existing development at outskirts of Wollaton</li> <li>• Southern Green Belt boundary should run at the northern foot of Stapleford Hill/Bramcote Ridge</li> <li>• Part of old playing fields to the north of church could be considered for building with access onto Coventry Lane. Sufficient space should be reserved for posterity to enable the extension of the Green Ridgeway which would allow a continuous footpath along the north of the old golf course (where the hedge is 300+ years old) through to Coventry Lane and the Hemlock Stone</li> <li>• Take school fields which currently have limited use out of the Green Belt and protect balloon wood and old quarry as green belt</li> <li>• There is a need to protect balloon wood and the old quarry but there is the potential in this area to reclassify green belt and still preserve the green space and wildlife corridor</li> </ul>	
<p>Zone 30</p> <ul style="list-style-type: none"> <li>• Agree with removing zones 29 and 30 – a new school is much needed in the area</li> <li>• Agree with removing zone 30 due to the many encroachments – as long as Bramcote Park remains protected</li> <li>• Disagree with the assessment that area south of Bramcote Ridge is unsuitable for housing – modest housing development (to financially assist the school) could be delivered on part of the school football pitches with vehicular access from Coventry Lane</li> <li>• Traffic on Derby road is already saturated and an exit onto the A52 directly or via current housing estate would cause severe problems</li> </ul>	<p>The Green Belt review is considered to accurately assess different zones against the purposes of including land in the Green Belt</p> <p>Decisions on site boundaries and allocations will be taken as part of the detailed site allocation process</p>
<p>Zone 31</p> <ul style="list-style-type: none"> <li>• Development constitutes urban sprawl in an unplanned manner.</li> <li>• The hill is unsuitable to be built on as is the area around the crematorium.</li> <li>• Dispute the assessment of zone 31 and consider it unsuitable for residential development due to its role as a wildlife corridor and buffer for Stapleford Hill LNR</li> <li>• Some of the area NW of Coventry Lane and the crematorium could be excluded from the Green Belt</li> <li>• Zone 31 could deliver housing development which would be preferable to zone 30, this will leave the rebuilding of the Bramcote Leisure Centre an option at zone 30</li> </ul>	<p>The Green Belt review is considered to accurately assess different zones against the purposes of including land in the Green Belt</p> <p>Decisions on site boundaries and allocations will be taken as part of the detailed site allocation process</p>
<p>Zone 32</p> <ul style="list-style-type: none"> <li>• Agree with ‘tidying up’ the boundary in zone 32 since it doesn’t provide a defensible boundary anymore</li> </ul>	<p>The Green Belt review is considered to accurately assess different zones against the purposes of including land in the Green Belt</p> <p>Decisions on site boundaries and allocations will be taken as part of the detailed site allocation process</p>

<p>Previously Developed Land</p> <ul style="list-style-type: none"> <li>• Build on brown belt such as Toton Sidings (but not Toton Bank), the old factories in Stapleford and the industrial units at balloon wood</li> </ul>	<p>Brownfield land is a priority for development but some Green Belt release is still required</p> <p>Note: Toton Sidings and balloon wood industrial units are brownfield but are also in the Green Belt</p>
<p>Reinstate Field Farm back into the Green Belt.</p> <ul style="list-style-type: none"> <li>• This would reverse fragmentation caused last year and would reinforce Green Belt purposes of surrounding area</li> <li>• Area bordered by the railway line to the North, Derby Road to the South, Ilkeston Road to the west and Moor Lane to the east should be protect by Green Belt including Stapleford Hill and Hemlock Stone</li> </ul>	<p>Field Farm is allocated in the Core Strategy</p>
<p>Re-distribute housing to the North of Broxtowe</p> <ul style="list-style-type: none"> <li>• North Broxtowe has far more space and should be redesigned with a boundary change.</li> <li>• Broxtowe should consider areas towards the north of the Borough where there is not the squeeze for land</li> </ul>	<p>Distribution is addressed in the Core Strategy</p>
<p>Brownfield Sites &amp; sites beyond the Green Belt</p> <ul style="list-style-type: none"> <li>• Development should be targeted at brownfield sites, sites beyond the green Belt and sites that are not significant open corridors for wildlife and recreation</li> <li>• Why hasn't more affordable housing been considered as part of the redevelopment of Beeston</li> </ul>	<p>Brownfield land is a priority for development but some Green Belt release is still required</p> <p>Site specific concerns will be considered in the Sustainability process as this review only relates to the Green Belt issues</p>

## **CABINET**

**13 OCTOBER 2015**

Present: Councillor R I Jackson, Chair

Councillors: S J Carr  
M R Kee  
E Kerry  
P Lally  
G Marshall  
J M Owen  
P J Owen  
M Radulovic MBE  
P D Simpson

65. **DECLARATIONS OF INTEREST**

There were no declarations of interest.

66. **MINUTES**

The minutes of the meeting held on 22 September 2015 were confirmed and signed.

67. **CABINET WORK PROGRAMME**

**RESOLVED that the Work Programme, including key decisions, be approved.**

**Reason**

The items included in the Work Programme will help to achieve the Council's key priorities and associated objectives.

68. **SCRUTINY REVIEWS**

Cabinet noted the matters proposed for and undergoing scrutiny.

69. **PROGRAMME OF MEETINGS FOR JANUARY TO APRIL 2016**

The proposed programme of meetings for 2015 was submitted. Members were informed that an additional Cabinet meeting would be added to consider the Council Tax Base and the necessity to rearrange the annual Council meeting due to the date of the election of the Police and Crime Commissioner.

**RESOLVED that the amended programme of meetings for January to April 2016 be approved.**

Reason

The meetings included in the programme will help to achieve the Council's key priorities and associated objectives.

**70. RESOURCES**

**70.1 Budget Variations 2015/16**

Members considered a number of budget variations which had been identified within the last few months.

**RESOLVED that the budget variations and proposed changes to reserves as set out in the appendix to the report be approved.**

Reason

This will assist with the Council's need to deliver value for money.

**70.2 Grants to Voluntary and Community Organisations, Charitable Bodies and Individuals Involved in Sports, the Arts and Disability Matters 2015/16**

Cabinet considered four applications for grant aid.

**RESOLVED that:**

**1. The applications be dealt with as follows:**

	<b>£</b>
<b>Eastwood Parkinson's Exercise Group</b>	<b>500</b>
<b>Eastwood Tennis Club</b>	<b>960</b>
<b>2<sup>nd</sup> Beeston Sea Scouts</b>	<b>1,750</b>

**2. The application from Nottingham Playhouse be deferred to a future meeting.**

Reason

1. The grant aid will assist in achieving the Council's key priority of bringing people together through the objective of encouraging healthy participation in arts, culture and leisure.
2. The application from Nottingham Playhouse was deferred to allow for further information to be submitted.

**70.3 Beeston Business Improvement District Renewal Ballot**

Members noted the outcome of the recent Beeston Business Improvement District renewal ballot.

## 71. STRATEGIC PLANNING

### 71.1 Summary of the Potential Options for Progressing the Council's Part 2 Local Plan (Site Allocations and Development Management Policies)

Cabinet considered the progress made in Plan preparation and a summary of responses to the public consultation on Green Belt issues and Development Management policies. Cabinet also considered the further work required and timescales for the recommended approach.

Members stated that there was an intention to work with neighbouring authorities in order to increase employment opportunities and decrease the amount of housing proposed for the Toton site.

Discussion took place on the advantages of bringing forward Brownfield sites before using land in Green Belt, in addition to the importance of promoting economic development around the proposed HS2 station in Toton. Further comments were made regarding risks contained in Option 2 of the report, in addition to the implications of changes to business rates on the M1 corridor.

The cost of the legal advice was requested and members were informed that the figure was approximately £3,500, which was within the budget allocated for such advice. A further request was made for the brief provided to the QC and members were informed this would be distributed following the meeting.

An amendment was proposed by Councillor R I Jackson and seconded by Councillor J M Owen that the following recommendation be added:

‘Broxtowe work with neighbouring authorities on the nature and form of development at Toton to secure more employment and the minimum amount of housing possible on the site.’

A recorded vote was proposed by Councillor M Radulovic MBE and seconded by Councillor P Lally. The voting was as follows:

<u>For</u>	<u>Against</u>	<u>Abstention</u>
R I Jackson		S J Carr
M R Kee		P Lally
E Kerry		
G Marshall		
J M Owen		
P J Owen		
M Radulovic MBE		
P D Simpson		

The amendment, on being put to the meeting, was carried.

#### **RESOLVED that:**

- 1. Option 2 in appendix 3 of the report be Council's recommended approach.**
- 2. The timetable in appendix 5 of the report be approved.**

3. **The officer approach to policy in general terms be endorsed.**
4. **Broxtowe work with neighbouring authorities on the nature and form of development at Toton to secure more employment and the minimum amount of housing possible on the site.**

Options considered and rejected.

Option 1. Allocate sites on which a minimum of 6,150 homes (minus completions) can be built with some allowance for windfalls (300 in the Core Strategy) but also flexibility/contingencies for what happens if some sites do not come forward.

Option 3. Allocate only sites within existing development limits in this Part 2 Local Plan and have a policy of further Green Belt/Local Plan review at some point in the future if delivery drops below the Core Strategy requirements.

Reason

1. to 4. This will assist with the Council's corporate priority of housing.

## 72. **HOUSING**

### 72.1 Homelessness Duty Discharge into the Private Rented Sector Policy

The Localism Act 2011 made significant changes to the way in which local authorities could deal with homelessness applications under Part 7 of the Housing Act 1996, as amended by the Homelessness Act 2002. The changes decreed that those who applied as homeless to the Council could no longer refuse an offer of private rented accommodation in favour of a social rented tenancy.

In order to make use of the powers, a policy for discharging the Council's homelessness duty into the private rented sector was developed to set out the necessary procedural arrangements.

**RESOLVED that the policy allowing the Council to discharge its homelessness duty by offering accommodation in the private rented sector, be approved.**

Reason

This will assist with the Council's housing priority.

### 72.2 Housing Services Annual Report 2014/15

Members considered the Housing Service Annual Report 2014/15 and highlighted the comprehensive extent of the service.

**RESOLVED that the Housing Services Annual Report 2014/15 be approved.**

#### Reason

This is a regulatory requirement of the Homes and Communities Agency and will assist accordance with the Council's housing priority.

### 72.3 Social Letting Agency

Cabinet received an update on the development of a private rented sector access scheme which had been piloted by the Council's Housing Allocations and Options Team since January 2015. Members stated that the Council should make every effort to be a good landlord and expressed satisfaction that the scheme would provide a full management service.

#### **RESOLVED to:**

1. **Extend the post of Private Sector Liaison Officer for one year to 30 September 2016 to maintain the private rented sector access scheme.**
2. **Delegate responsibility to the Director Housing, Leisure and Property Services to develop a full business case for the proposed Social Lettings Agency.**

#### Reason

1. and 2. The key objectives are to ensure that the supply of affordable rented properties extends beyond the social rented sector and to work with private sector landlords to provide a full lettings service.

### 72.4 Solar Panel Proposals for Retirement Living Schemes

Members noted proposals to install solar panels at a number of the Council's retirement living schemes at a cost of up to £200,000. It was suggested that the proposals would have been more widespread were it not for the impending deadline to achieve delivery before the feed-in-tariff reductions.

**RESOLVED that standing orders be waived in relation to procurement and to delegate the contract award to the Director of Housing, Leisure and Property Services in consultation with the Housing Portfolio Holder.**

#### Reason

This will assist with the Council's corporate priority of environment issues through the objectives of increasing the amount of energy it uses from renewable sources and reducing the carbon footprint of the Borough.

## 73. **LEISURE**

### 73.1 Oxylane – Joint Planning Application

At its meeting on 16 October 2014 Cabinet resolved that the principle of a joint planning application in association with Oxylane, to support the development of a new leisure centre within the complex, be supported.

It was stated that Councillor R S Robinson had requested to speak at the meeting, however the Chair had rejected the request and explained that as Cabinet was proportionately represented it would not be suitable to allow non-Cabinet members to address the meeting.

Members considered whether the previous Cabinet decision to submit a joint planning application with Oxylane remained appropriate.

An amendment was made by Councillor J M Owen and seconded by Councillor P J Owen that the recommendation read as follows:

‘The Council does not proceed with the joint planning proposal and the Leisure Strategy be amended accordingly.’

Cabinet debated the proposal and it was suggested that the joint application would be beneficial to the Council as it would provide a new leisure centre, country park and road layout. Furthermore, the proposal would provide significant opportunities for the Council and allow for future cooperation with investors.

However, it was further stated that the location for the leisure centre was unsuitable and would not serve the residents of the local community, would cause an increase in traffic congestion and require unnecessary building on Green Belt land. Moreover, applications had previously been rejected on this development by the Council's Planning Committee.

A recorded vote was proposed by Councillor M Radulovic MBE and seconded by Councillor P Lally. The voting was as follows:

<u>For</u>	<u>Against</u>	<u>Abstention</u>
R I Jackson	S J Carr	
M R Kee	P Lally	
E Kerry	G Marshall	
J M Owen	M Radulovic MBE	
P J Owen		
P D Simpson		

The amendment, on being put to the meeting, was carried.

**RESOLVED that the Council does not proceed with the joint planning proposal and the Leisure Strategy be amended accordingly.**

Reason

This will assist with the Council's objective to provide value for money in addition to protecting the integrity of the Green Belt and recognising the need for accessible leisure facilities.

## 73.2 Spin Bikes

Members were informed that the existing X-Bikes at both Kimberley Leisure Centre and Chilwell Olympia Sports Centre were in urgent need of

replacement. A range of options had been examined for the replacement of the existing bikes and the preferred solution would be to replace the X-Bikes with spin bikes.

**RESOLVED that a supplementary capital estimate of £26,747.50 to purchase replacement spin bikes to be funded from reserves.**

Reason

This will assist with the Council's objective to provide value for money