



6 December 2017

Dear Sir/Madam

A meeting of the Jobs and Economy Committee will be held on Thursday, 14 December 2017 in the New Council Chamber, Foster Avenue, Beeston, commencing at 7.00pm.

Should you require advice on declaring an interest in any item on the agenda, please contact the Monitoring Officer at your earliest convenience.

Yours faithfully

Chief Executive

To Councillors:	B C Carr	J W Handley
	E Cubley	M Handley
	T A Cullen	A Harper (Chair)
	M J Crow (Vice Chair)	P Lally
	L Fletcher	R S Robinson

AGENDA

1. APOLOGIES FOR ABSENCE

2. DECLARATIONS OF INTEREST

Members are requested to declare the existence and nature of any disclosable pecuniary interest and/or other interest in any item on the agenda.

3. MINUTES

PAGES 1 - 3

The Committee is asked to confirm as a correct record the minutes of the meeting held on 2 November 2017.

4. PART TWO LOCAL PLAN

PAGES 4 - 41

To consider representations to the formal six week publication of the Broxtowe part 2 Local Plan and to seek endorsement for some changes to the plan prior to the submission to the Secretary of State.

5. WORK PROGRAMME

PAGE 42

To consider items for inclusion in the Work Programme for future meetings.

JOBS AND ECONOMY COMMITTEE

2 NOVEMBER 2017

Present: Councillor A Harper, Chair

Councillors: T A Cullen
M J Crow (Vice Chair)
E Cubley
D A Elliott (Substitute)
L Fletcher
E Kerry
W J Longdon
K E Rigby

Apologies for absence were received from Councillors B C Carr, J W Handley, M Handley, R I Jackson, M Radulovic MBE and R S Robinson.

19. DECLARATIONS OF INTEREST

There were no declarations of interest.

20. MINUTES

The minutes of the meeting held on 14 September 2017 were confirmed and signed, with an amendment to include Councillor R S Robinson on the list of apologies.

21. EXPANSION OF TOWN CENTRE WI-FI

The Committee heard a presentation from a representative of Elephant Wi-Fi regarding the implementation of a free wi-fi scheme in Stapleford. The representative of Elephant Wifi left the meeting to allow members to debate the recommendation.

It was considered that Wi-fi had proved popular in Stapleford, with 663 users logging in between 3 October and 2 November 2017 and that it could be of benefit to all of the town centres. Collecting data on Beeston, Eastwood and Kimberley, along with Stapleford would provide a suite of figures that could be used to direct the strategies of existing businesses and attract new businesses. The information could also be used to inform the actions of the relevant officers as well as the Council's overarching economic strategy.

RESOLVED that quotations be sourced for the provision of free Wi-Fi in Beeston, Eastwood and Kimberley.

22. ECONOMIC REGENERATION UPDATE AND ECONOMIC REGENERATION STRATEGY REPORT 2017 – 2021

The Committee noted the Economic Regeneration Strategy. It was clarified that Local Enterprise Partnership funding, which had been provided by the European Union, would be available until 2020.

Discussion progressed on the creation of the database of businesses. The intention of this was to create a relationship between businesses within Broxtowe and the Council so that there was a dialogue about what businesses really needed to flourish. There followed a discussion about a multi modal study which had been undertaken by the Department for Transport that had highlighted Broxtowe as an area ripe for development because of its connectivity. The Committee requested that a report on the multi modal study be brought to a future meeting.

RESOLVED that the Council's Economic Regeneration Strategy 2017 – 2012 be approved.

23. BUSINESS HEALTH CHECK AND ADVICE EVENT

The Committee noted that there had been a Business Health Check and Advice Event organised by members of the Economic Development Team to help businesses that were starting up or looking to expand.

It was noted that six businesses had taken up the eight available appointments and this success had led to the booking of a further, similar event. Consideration was given to the suggestion that finding help can often take too much time for businesses that are starting up or growing. It was noted that the agencies providing assistance would be receptive to any requests for a more flexible approach.

24. UPDATE ON KEY SITES

The Committee noted the update on key sites for development across the Borough.

It was noted that the section 106 agreement for Beeston Business Park was due to be signed shortly. There had also been progress on the Walker Street site, which had been the subject of discussions with Nottinghamshire County Council.

It was commented that there had been a delay to building work on the western side of the Beamlight site due to a problem with the legal notice for the road closure. The technology for decontamination had progressed over the years and that a trench may be a suitable way to rid the site of leachate.

There followed a discussion about section 106 agreements and the length of time they took to agree. The Committee was informed that the largest site for

development were the most complicated in terms of agreeing section 106 contributions and that they were subject to scrutiny from other public authorities, in particular Nottinghamshire County Council.

25. BUILDING CONTROL ANNUAL REPORT

The Committee noted the performance data regarding the Building Control Service being provided for the Council by Erewash Borough Council.

The discussion centred on the difficulty in finding and retaining professionally qualified staff. It was noted that any increase in development would be dealt with through hiring agency staff. It was also noted that there could be opportunities to work with other authorities in the area on the same shared service basis

26. PERFORMANCE MANAGEMENT – REVIEW OF BUSINESS PLAN PROGRESS – BUSINESS GROWTH

The Committee noted progress against targets identified in the Business Growth Business Plan.

The Committee noted that the Nuthall Neighbourhood Plan was nearly ready to submit to examination and a number of other neighbourhood plans were in their final stages. The first plans were expected to be adopted in early 2018. It was noted that the Planning Department was recruiting to support communities to produce their plans.

A question was asked about the Stapleford Gateway. It was noted that the Stapleford Gateway would be discussed at the meeting of the Policy and Performance Committee on 21 November 2017. It was considered that getting free Wi-Fi was part of improving the offer in Stapleford to attract visitors to the town centre. In the long term, plans were being made to ensure that Stapleford would benefit from its proximity to the HS2 East Midlands Hub, which was expected to be finished by 2033.

It was noted that snagging works around the tram route were continuing throughout Beeston and Chilwell. It was considered that this would be addressed by a report that was to be heard by the Policy and Performance Committee on 21 November 2017

27. WORK PROGRAMME

The Committee requested a report on the Multi Modal Study be added to the Work Programme.

RESOLVED that the Work Programme, as amended, be approved.

Report of the Chief Executive

PART TWO LOCAL PLAN1. Purpose of report

To consider representations to the formal six week publication of the Broxtowe part 2 Local Plan and to seek endorsement for some changes to the plan prior to the submission to the Secretary of State.

2. Background

The Jobs and Economy Committee endorsed the publication of the plan at the meeting on 6 July 2017. A significant issue at this meeting was the choice of site at Brinsley to be allocated with the Committee resolving 'Option 1' (land off Church Lane) was the correct choice on Green Belt policy grounds.

3. Details

The summary of responses is included at the appendix. As expected a number of developers and landowners consider the choice of sites are not correct and those affected by development also consider that alternative sites should be considered. Our duty to co-operate partners have some comments on the plan that do need to be addressed prior to submission and a sequence of meetings have already been arranged in an effort to confirm minor changes to the plan to address their points. Further updated viability work is underway factoring in the infrastructure requirements of our duty to cooperate partners. There have not been issues raised to date that are considered by officers to cause significant delay or to result in a fundamentally different strategy to that put out to consultation. It is anticipated that the work described above, together with the most up to date land supply position as a result of the SHLAA review, and any recommended changes to the plan can be put back to this committee in early 2018 with a submission shortly afterwards. This will include the results of further work undertaken by Brinsley Parish Council in relation to their site preference.

Detailed in the appendix are some changes that can be approved now. These are;

- Agreement to the amendment put forward by Greasley Parish Council regarding the protection of the land adjacent to Thorn Drive on page 6.
- Agreement to the amendment put forward by residents of Beeston Rylands regarding the designation of the 'Horses Field' as Local Green Space on page 20.

These changes do not adversely affect any proposed development opportunities. There is no need to change the plan in relation to Kimberley as Kettlebrook Lodge was not proposed to be allocated in the first place.

4. Financial implications

The Local Plan examination is likely to cost up to £80,000. This is included in the budget for the financial year 2018-19.

Recommendation

The Committee is asked to:

- 1. RESOLVE that the changes to the plan detailed in the report be approved.**
- 2. NOTE the further work to address comments made by key consultees prior to the full plan being returned to the Committee with final recommended changes.**

Background papers; Nil

APPENDIX

'Duty to co-operate' bodies, 'specific consultation bodies' and other organisationsDevelopment management policies

Environment Agency:

- “Welcomes and supports” Policy 1, Flood Risk. However suggests alternative/additional wording for part of the policy and the associated justification text, regarding “equivalent quality” flood defences and finished floor levels.
- Is satisfied with Policy 19, Pollution, Hazardous Substances and Ground Conditions.
- Recommends the inclusion of a policy on Sustainable Drainage Systems and proposes a detailed wording. (However the EA does not object to the soundness or legal compliance of the Plan on this basis.)

Historic England:

- Welcomes Policies 18 and 28, Shopfronts, Signage and Security Measures and Green Infrastructure Assets.
- Recommends the use of the term “conserve” rather than “preserve” in Policy 23, Proposals Affecting Designated and Non-designated Heritage Assets. For the justification text it recommends “a balanced view” in that heritage protection can be seen as “a positive element contributing to heritage led regeneration” as well a constraint on development.
- Proposes that Policy 32, Developer Contributions, should be expanded to refer to contributions for “the historic environment, heritage assets and/or their setting”, or similar, to cover situations where mitigation measures are required.
- Makes various detailed comments on the Sustainability Appraisal.

Natural England:

- Welcomes Policy 28, Green Infrastructure Assets, however proposes amended policy wording, which would refer to the loss of assets.
- Objects to Policy 31, Biodiversity Assets, and proposes alternative policy wording. This “builds on the approach set out within the Aligned Core Strategy” and would say, among other things, that “all development proposals should seek to deliver a net gain in biodiversity and geodiversity and contribute to the Borough’s ecological network”.

Nottingham West Clinical Commissioning Group:

- All the site-specific representations listed below also relate to Policy 32, Developer Contributions.

Nottinghamshire County Council:

- Welcomes the recognition of health and well-being benefits in Policy 8, Development in the Green Belt, and suggests further references, including to ‘active ageing’.

- Proposes that a reference to health and well-being benefits is added to the justification text for Policy 10, Town Centre and District Centre Uses.
- Welcomes Policy 22, Minerals.
- Welcomes Policy 24, The Health Impacts of Development, although suggests that the title should include “well-being”.
- Considers that the Bramcote Moor Grassland Local Wildlife Site should be designated as Local Green Space in Policy 27.
- Wants a reference to the Infrastructure Delivery Plan (IDP) to be added to Policy 32, Developer Contributions. (The County also makes various detailed comments on the IDP itself.)
- Asks for a reference to its ‘Transport Statement for Funding’ document to be added to Table 2 (which concerns strategic policies).

Ashfield District Council:

- Has “no issues” with the Plan’s development management policies or site allocations.

Awsworth Parish Council:

- Considers that Policy 17, Place-making, Design and Amenity, should include a criterion “ensuring porous boundary treatment in new development to allow small mammals (especially hedgehogs), amphibians etc to pass through unhindered”.
- Considers that the justification text for policy 23, Proposals Affecting Designated and Non-designated Heritage Assets, should include reference to Bennerley Viaduct.
- Considers that the justification text for Policy 28, Green Infrastructure Assets, should include references to Sustrans and the ‘Great Northern Greenway’.
- Asks the Borough Council to consider whether policy 29, Cemetery Extensions, should include an extension at St Peter’s Church, Awsworth.
- Makes various comments on the OPUN Awsworth Design Review Panel Workshop Report and asks the Borough Council to consider whether the Plan requires any amendment to reflect these comments.

Brinsley Parish Council:

- Considers that, in Policy 30, Landscape, “the landscape of Church Lane” should be added to the list of local landscape character areas, as defined in the 2009 Greater Nottingham Landscape Character Assessment.

Greasley Parish Council:

- Considers that a new sub-clause should be added to Policy 28, Green Infrastructure Assets; this should be called ‘A mix of Informal Open Spaces and flood mitigation measures’ and it should apply to land off Thorn Drive, Newthorpe.
- Supports the inclusion of Green Infrastructure corridor 2.2, as referred to in Policy 28.
- Borough Councillor Margaret Handley has submitted representations supporting the Parish Council’s comments.

Stapleford Town Council:

- Considers that Policy 9, Retention of Good Quality Existing Employment Sites, gives “no clear indication of how these aspirations would be met”.
- Does not want to see the area of Stapleford District Centre contracted, as is proposed in Policy 10, Town and District Centres, and Map 37, as it is not considered that this would help business expansion.
- Considers that Stapleford needs more than the 10% proportion of affordable housing that is proposed in Policy 15, Housing Size, Mix and Choice.
- Considers that Policy 20, Air Quality, should make particular mention of Stapleford.
- Considers that Policy 23, Proposals Affecting Designated and Non-designated Heritage Assets, does not sufficiently emphasise the heritage assets within Stapleford.
- Makes various detailed, and more general, observations relating to the Plan, including criticisms of some of the Plan’s descriptions of Stapleford, a desire for “a clear identification of the number of units of new housing that the Town was expected to accommodate” and opinions that the Plan “had to a great extent ignored Stapleford” and that “the Local Plan document and the process that led up to it is lacking in transparency”. The Town Council also considers that there should be a review of the Core Strategy “so as to either change the size of the overall housing figure for greater Nottingham or revise the way it is distributed”.
- Borough Councillor Richard MacRae has submitted representations supporting many of the Town Council’s comments and also proposing (implicitly with regard to Policy 32, Developer Contributions) that section 106 funding should be used to improve community facilities in Stapleford such as the pavilion and play area on Hickings Lane. With regard to Policy 10, he considers that the boundary of the Centre should be extended.

Bramcote Neighbourhood Forum:

- Supports Policy 1, Flood Risk;
- Proposes an amendment to the justification text for Policy 19, Pollution, Hazardous Substances and Ground Conditions.
- Welcomes Policies. 20, 24, 26 and 28, Air Quality, The Health Impacts of Development, Travel Plans and Green Infrastructure Assets.
- Supports the designations of Local Green Space in Bramcote in Policy 27, but would like additional designations, including part of Bramcote Hills Golf Course, and proposes an amendment to the justification text.
- Considers that Policy 30, Landscape, should “make provision for suitable compensation to be provided” in the case of housing development on land currently within the Green Belt.
- Considers that the Moor Lane cutting should be added to the list of Local Geological Sites in Appendix 4, which is referred to in Policy 31, Biodiversity Assets.
- “Corrections”, updates and/or amendments should be made to maps 1 (Main Built-up Area), 4 (housing commitments) and 62 (Green Infrastructure corridors).

Chetwynd: The Toton and Chilwell Neighbourhood Forum:

- Proposes additions to Policy 1, Flood Risk, and its justification text to refer specifically to the Erewash Valley at Toton Sidings and to encourage solar panels and rain water harvesting systems.
- Proposes additional references to walking and cycling in Policy 17, Place-making, Design and Amenity. The Forum also considers that a requirement to provide high speed broadband services should be included in this policy.
- Proposes additions to the justification text for Policy 23, Proposals Affecting Designated and Non-designated Heritage Assets. These would: say that the policy applies to “immediate associated areas (such as green spaces / gardens etc)”; refer to heritage assets at Chetwynd Barracks which may not yet have been formally registered; and confirm that the Council will work proactively with Neighbourhood Forums.
- Proposes additions to Policy 25, Culture, Tourism and Sport and its justification text. These would refer to artificial, all-weather ‘3G’ pitches and “the legacy of Chetwynd Barracks (especially relating to the WW1 shell factory and associated memorial”.
- Proposes additional justification text for Policy 26, Travel Plans, to emphasise walking, cycling and public transport.
- Proposes additional justification text for Policy 27, Local Green Space, to say that the Council “expect to receive an application” for Local Green Space designation at Toton and Chetwynd.
- Proposes additions to Policy 28, Green Infrastructure Assets, and its justification text. These would: refer to artificial, all-weather ‘3G’ pitches; say that Green Infrastructure corridors should be 50 metres wide; and say that the Council will re-route the Erewash Valley Trail though the eastern side of Chetwynd Barracks.
- Proposes additions to the justification text for Policy 32, Developer Contributions. These would emphasise the importance of education contributions and say that “all Section 106 contributions will be directed in the first instance to the Borough wards/town & parish councils affected by developments”.

The Coal Authority:

- Supports Policies 21 and 22, Unstable Land and Minerals, and their justification texts.

Severn Trent:

- Has provided some “general guidelines” which relate indirectly to Policy 1, Flood Risk.

The Canal & River Trust:

- “Do not have any comments” on the development management policies or site allocations.

The Forestry Commission:

- Provides background information and advises that it “is not in a position to input in detail into the consultation process for Local Plans”.

National Grid:

- Has “no comments” on the development management policies or site allocations.

Sport England:

- With regard to Policies 17 and 24, Place-making, Design and Amenity and The Health Impacts of Development, Sport England (SE) “supports the idea of health impact to be a design consideration for new communities and would encourage the inclusion of a design policy which encourages developments to be designed to promote active lifestyles”.
- With regard to Policy 25, Culture, Tourism and Sport, SE “are pleased that it is the council’s intention to ensure policies provide adequate sport and recreation facilities as part of new developments. However, the level of provision should be determined locally and should be informed by the Playing Pitch Strategy and Green Infrastructure Strategy”.
- With regard to Policy 27, Local Green Space, SE “is encouraged that the emerging local plan looks to include policies to protect existing sport/leisure facilities”. However, “it is thought that the plan should also include policies and to provide new sports/leisure facilities that are required to meet identified needs e.g. site allocations for new playing fields, requirements in major housing and mixed-use developments for sport/leisure provision, sports hubs allocations etc”.
- With regard to Policy 28, Green Infrastructure Assets, SE “welcomes the inclusion of policies which ensure adequate provision for new development (especially residential) to provide for the additional sport/leisure facility needs that they generate through CIL and/or planning obligations”.

Sustrans:

- In Policy 28, Green Infrastructure Assets, considers that ‘recreational routes’ should be re-named “to reflect their multifunctional use and potential” including “sustainable active travel infrastructure for everyday journeys and for accessing services”. (A specific alternative name is not suggested.)
- Considers that Policy 32, Developer Contributions, in order to help fund improvements to routes and trails including the Great Northern Path, should include “reference to green infrastructure assets including multi-user non-motorised transport routes and trails”.

Home Builders Federation:

- The Home Builders Federation makes various comments relating to Policy 15, Housing Size, Mix and Choice. It considers that the word “size” should be removed, “so there is no conjecture that the Council is seeking to adopt the Nationally Described Space Standard”. With regard to affordable housing requirements, it considers that the percentages should not be expressed as minima. It also says that the Nottingham Core Viability Update Study (September 2013) is “somewhat out of date” and that that the Council has presented no new evidence to support the policy. With regard to the requirement for ‘accessible and adaptable dwellings’, the HBF considers that “it is incumbent on the Council to provide a local assessment evidencing the specific case for Broxtowe which justifies the case for the optional higher standard”. With regard to self-build or custom-build housing, the HBF

considers that there is no publicly available evidence to justify the Council's approach, and that the Council has not undertaken any viability assessment of the proposal.

- Considers that the reference in Policy 17, Place-making, Design and Amenity, to 'Building for Life 12' design standards should be moved from the policy to the justification text, because "the use of Building for Life 12 should remain voluntary". It considers that "the requirement for 9 or more greens is also a misinterpretation of the use of Building for Life 12".
- Considers that the second part of Policy 20, Air Quality, is "a vaguely expressed aspiration" and that "it is doubtful if this aspect of the policy can be effectively implemented".
- Points to a suggested inconsistency between Policy 26, Travel Plans, and its justification text and in any case considers that "Travel Plans should only be required if there is an identified impact to warrant such a requirement".
- Questions whether the designation of land east and west of Coventry Lane as Local Green Space in Policy 27 is appropriate, because "this designation could be construed as a re-designation as Green Belt by another name via the back door".
- With regard to Policy 32, Developer Contributions, considers that "it should be clear that any improvements to existing facilities is related to the proposed development and is not rectifying an existing deficiency".

Active Notts (previously Sport Nottinghamshire):

- Policy 17, Place-making, Design and Amenity, "and/or" Policy 27, Local Green Space, should require "developments to be inclusive of the ten principles identified in Sport England's Active Design Guide, the TCPA Guidance on Healthy Living Environments".
- Policy 25, Culture, Tourism and Sport, should say that "the refresh of the Leisure Facilities Strategy for the district will identify future priorities that meet the needs of the local communities to lead healthy and active lives".

Beeston and District Civic Society:

- "Largely agree" with policy 10, Town Centre and District Centre Uses. However Beeston Town centre should include the Town Hall and Library on Foster Avenue and the properties on Broadgate on the eastern side of Marlborough Road. It also "could" include Lidl on Wollaton Road. Also, there "could" be a policy requiring large retail/entertainment venues to contain public toilet facilities.
- Considers that Policy 15, Housing Size, Mix and Choice, should manage the proportion of Houses in Multiple Occupation (HMOs). It should require consideration of whether a new HMO, by itself or cumulatively, would harm the character and amenity of a street or residential area and should take into account the proximity of purpose-built student accommodation. Also, "local character appraisals could be in place to support design policies".
- With regard to Policy 23, Proposals Affecting Designated and Non-designated Heritage Assets, and its justification text, the Society considers that the Plan must contain adopted criteria that will be used to determine whether buildings, landscapes or areas are worthy of "designation as non-designated heritage assets" or new Conservation Areas and there should be "an accessible local

list of assets linked to the policy”. There should be “a positive policy with reference to buildings at risk rather than just an intention to monitor them” and “a positive policy that refers to the possible creation of new Conservation Areas”. The justification text should say that the Council “will produce” (rather than “will consider the production of”) a Local List of non-designated assets and “will” (rather than “will look to”) work pro-actively with established Civic Societies.

Beeston Wildlife Group:

- Considers that two fields adjacent to Cornwall Avenue and Leyton Crescent Recreation Ground should be designated as Local Green Space in Policy 27.

Brinsley Vision (representing 70 residents of Brinsley):

- Proposes that the justification text for Policy 23, Proposals Affecting Designated and Non-designated Heritage Assets, should refer to two potential additional Article 4 Directions, to the south-west and north-east of Brinsley. Proposes updates/corrections to the description of the Conservation Area and suggests its extension to Hall Farm. Proposes that the text should refer to the Council working with local voluntary groups and Local History Societies, as well as with Civic Societies.
- Supports Policy 25, Culture, Tourism and Sport, but “do not think it goes far enough”. Proposes that further links between DH Lawrence and Brinsley should be investigated and established.
- Supports Policy 27, Local Green Space, but proposes two additional designations, to the south-east and north-east of the village.
- Supports Policy 28, Green Infrastructure Assets, but proposes the designation of an additional recreational route, the ‘Brinsley Steeplechase’ (a 5.5 mile circular walk around the village).
- Supports Policies 29, 30 and 31, Cemetery Extensions, Landscape and Biodiversity Assets.

Broxtowe Labour Group:

- Considers that “additional commitments” should be built into the Plan to ensure “environmentally friendly housing developments”, regarding issues such as solar panels and ground source or air source heat pumps.
- Considers that the Plan should enable Broxtowe to become a “proactively green borough”, regarding issues such as electric charging points, cycle paths, and the allocation of land for green energy, such as solar or wind energy.
- Considers that a corridor of land should be protected for a new tram route to Kimberley and Eastwood.
- Would like a policy dealing with situations “where community facilities do need to be moved in order to make way for proposed development”.
- Proposes that Policy 10, Town Centre and District Centre Uses, should not change the boundaries of the centres.
- Considers that Policy 15, Housing Size, Mix and Choice, should include “strengthened commitments to the provision of dementia friendly housing and supported living” and a “specific commitment” to “an increased development of Council owned social housing”.

- Considers that Policy 22, Minerals, should “assert a commitment to a frack free Broxtowe”.
- Regarding Policy 28, Green Infrastructure Assets, considers that a Green Infrastructure Corridor should be added between HS2 and Bramcote Woods, “with a view towards creating a single extended green infrastructure corridor between the North and South of the Borough”.

KENTAG (Kimberley, Eastwood, Nuthall Tram Action Group):

- Considers that the Plan should protect a route for the extension of the tram to Kimberley and Eastwood and ensure that any future housing development “saves space for the tram”.
- Borough Councillor Richard Robinson and Gloria De Piero MP have submitted representations supporting KENTAG’s comments.

Nottinghamshire Campaign to Protect Rural England:

- Welcomes Policies 8, 20, 23 and 26, Development in the Green Belt, Air Quality, Proposals Affecting Designated and Non-designated Heritage Assets and Travel Plans. The CPRE says that its comments on Policies 20 and 26 are supported by Nottinghamshire Campaign for Better Transport.
- In Policy 28, Green Infrastructure Assets, the CPRE considers that the phrase “unless the benefits of the development are clearly shown to outweigh the harm” should be removed, because it “leaves so much room for interpretation” that it would “undermine the overall policy intention”.

Nottinghamshire Wildlife Trust:

- Supports the inclusion in Policy 17, Place-making, Design and Amenity, of clauses relating to wildlife. However it proposes the addition of references to specific issues, including insect houses and gaps under fences for hedgehogs. It also considers that the policy should address management of habitats in perpetuity.
- Supports the inclusion of the point about darkness in relation to nature conservation in Policy 19, Pollution, Hazardous Substances and Ground Conditions.
- Supports Policy 27, Local Green Space. However, considers that the phrase “except in very special circumstances” should be removed because “this will undermine the policy protection”.
- Supports Policy 28, Green Infrastructure Assets. However, considers that the policy should state that corridors must be at least 50 metres wide, and proposes an amendment to the justification text.
- Supports Policy 29, Cemetery Extensions.
- Proposes additions to the definition of Biodiversity Assets in Policy 31, to include references to UK priority species and habitats as identified in the NERC Act (not the same as Nottinghamshire ones) and legally protected species (not the same as priority ones). It also proposes a Biodiversity SPD.
- Supports Policy 32, Developer Contributions.

Pedals (Nottingham Cycling Campaign):

- Supports policies 26 and 28, Travel Plans and Green Infrastructure Assets.

Broxtowe Borough Council Environment Department:

- Proposes various corrections to the justification texts, maps and appendices, however has no representations on the development management or site allocation policies.

Site allocations

Environment Agency:

- Supports Policy 3.2, Toton site allocation, and “would welcome the opportunity to develop a partnership approach to managing the environmental risks to this site”.

Historic England:

- “Welcomes and supports” references to heritage issues in policies 3.1 and 6.1, site allocations at Chetwynd Barracks and Walker Street Eastwood.
- Regarding Policy 4.1, Awsworth site allocation, recommends that reference to the conservation or enhancement of heritage assets, particularly the Viaduct, is added to the Key Development Requirements or Key Development Aspirations.
- In Policy 5.1, Brinsley site allocation, HE recommends that the term “conserve” is used, rather than “preserve, with regard to the setting of St James’ Church. (HE also notes that the site area has been reduced in order to mitigate the impact on heritage assets.)

Natural England:

- Welcomes the Key Development Requirements regarding Green Infrastructure for Policy 3.1, Chetwynd Barracks site allocation.
- Welcomes the Green Infrastructure references in Policy 3.2, Toton site allocation, and the associated justification text.

Nottingham West Clinical Commissioning Group:

- With regard to Policy 3.1, Chetwynd Barracks site allocation, a site should be reserved to provide primary care services and Section 106 contributions should be sought.
- With regard to Policy 3.2, Toton site allocation, any development beyond 500 homes should be considered “alongside” the Chetwynd Barracks development.
- With regard to Policies 3.3 and 3.4, site allocations east and west of Coventry Lane, Section 106 contributions should be sought to support the expansion of existing facilities at Bramcote Surgery and Hickings Lane Medical Centre.
- With regard to Policies 3.5, 3.6, 3.7, 3.8 and 11, site allocations at Severn Trent, Beeston Maltings, Cement Depot, Wollaton Road and Beeston Square, Section 106 contributions should be sought to “increase the physical clinical space” through “small scale developments”.
- With regard to Policies 4.1, 5.1 and 6.1, site allocations at Awsworth, Brinsley and Eastwood, part of the Walker Street site should be allocated for a new health facility and Section 106 contributions should be sought for this purpose.
- With regard to Policies 7.1, 7.2 and 7.3, site allocations at Kimberley Depot, South of Eastwood Road and Eastwood Road Builders Yard, Kimberley,

Section 106 contributions should be sought to “increase the physical clinical space” at the Hama Medical Centre.

Nottinghamshire County Council:

- Considers that the ‘Key Development Requirements’ in policy 3.1, Chetwynd Barracks site allocation, should specify highway infrastructure requirements. These should be considered together with those for Toton.
- Supports the inclusion of Policy 3.2, Toton site allocation. However the ‘Key Development Requirements’ should include highway infrastructure requirements, which should be considered together with those for Chetwynd Barracks. A ‘Key Development Requirement’ should also be that development should be “located and designed to complement and not prejudice proposals for access to the HS2 Hub Station and Innovation Village”.
- Considers that either Policy 3.3, site allocation east of Coventry Lane, should be amended in relation to wildlife protection. More detail should also be included on green infrastructure and highway constraints. (The County also makes related comments on the Sustainability Appraisal.)
- Considers that the ‘Key Development Requirements’ and justification text for Policy 3.5, Severn Trent site allocation, should require “an appropriate stand-off distance and landscape screening measures” to avoid potential conflict with the neighbouring Household Waste Recycling Centre.
- With regard to Policy 4.1, Awworth site allocation, the proposed access from the bypass “is only to be considered as a last resort and wouldn’t be favoured by the highway authority”.
- The County also makes comments on the Infrastructure Delivery Plan, some of which appear to imply that the County may consider it appropriate that amendments with regard to education contributions (and/or further discussions) are appropriate in respect of policies 3.1, 3.2, 3.3 and 11, site allocations at Chetwynd Barracks, Toton, East of Coventry Lane and The Square, Beeston.

Derbyshire County Council:

- Supports Policy 3.1, Chetwynd Barracks site allocation, including because it is a “key element” of the joint Housing Infrastructure Fund bid.
- Supports Policy 3.2, Toton site allocation, including its references to Green Infrastructure and connectivity, and because it is a “key element” of the joint Housing Infrastructure Fund bid. The County considers that an assessment of the potential impact on Derbyshire schools and pupils should be undertaken and it “would welcome the opportunity to engage in on-going discussions with Broxtowe Borough Council on this matter”.
- Expresses concern that site allocations in Policy 3 at Chilwell, Toton and Stapleford “could potentially have significant effects upon roads in Derbyshire” and therefore “early engagement with the East Midlands Modelling Group would be advisable”.

Erewash Borough Council:

- Supports Policy 3.2, Toton site allocation, particularly references to access enhancements to Long Eaton. However it notes that there are as yet no agreed tram routes through Erewash to either East Midlands Airport or Derby

and that any additions to the tram network beyond the HS2 station would be subject to the policies of Erewash's Local Plan.

Gedling Borough Council:

- With regard to the site allocations in Policy 2, Gedling “are not raising any strategic planning concerns at this stage”, however “would appreciate the opportunity to consider and if necessary make further comments” on the site selection document at submission stage.

Nottingham City Council:

- Has no objections to the Plan's site allocations or development management policies. However, with regard to Policy 3.2, Toton site allocation, the City suggests that “the Borough might consider providing a bit more detail in terms of the disposition of uses across the mixed use allocation, to provide more certainty and guidance for planning applications”. The City Council also would not support the relocation or reduction in capacity of the Park and Ride site, or changes to its access from the strategic and local road network.
- Considers that Policy 7.1, site allocation south of Kimberley, should include a Key Development Requirement that development should be designed to allow for a potential new tram route.

Awsworth Parish Council and Awsworth Neighbourhood Plan Steering Group:

- Consider that the justification text for Policy 3.2, Toton site allocation, should include reference to Ilkeston Station.
- With regard to Policy 4.1, Awsworth site allocation, the Parish Council and the Steering group consider that “the local community have serious concerns about the impact on and capacity of the settlement to absorb this amount of development”. They therefore consider that the Plan “should make clear the infrastructure likely to be required to adequately support the proposed new housing development”.
- In particular, the Plan should “more accurately and clearly set out the requirements for any new housing development in relation to satisfactorily addressing traffic implications for the local highway network”. They say that “the local community are especially concerned that the purpose of the A6096 Shilo Way Bypass should not be compromised” and they therefore consider that “there should be no vehicular connection between the proposed new housing site and the existing housing estate (i.e. Park Hill / Barlow Drive North)”. Mitigating highways impact, including highway safety, should be a policy ‘requirement’ rather than an ‘aspiration’.
- The justification text should also be clearer regarding the benefits of the policy that are reported in the Sustainability Appraisal.
- Amendments should be made to maps 16, 17 and 18 and minor changes should be made to the justification text.

Brinsley Parish Council and Brinsley Neighbourhood Plan Steering Group:

- Strongly oppose the allocation of land at Church Lane in Policy 5.1 and consider that, if any land must be removed from the Green Belt, land at Cordy Lane should be allocated instead. Reasons for opposing the Church Lane site include: encroachment and sprawl, contrary to Green Belt policy; harm to the character of the village; harm to landscape; harm to heritage assets, including

The Headstocks; harm to wildlife, on the site and on the adjacent Local Wildlife Site and Nature Reserve, including from the impact of artificial light; difficulties for residents in accessing local amenities, including crossing the busy main road; doubts about the ownership of the means of access and its width; and setting a precedent for further development. The Parish Council and the Steering Group also consider that the evidence in the 2015 Green Belt Review is not credible, that the report to the July 2017 Jobs and Economy Committee was biased and contained inaccurate information, and that the Borough Council has paid too much attention to the views of Ashfield District Council and has gone against the wishes of the residents of Brinsley. Reasons for preferring the Cordy Lane site are summarised by the Parish Council as: “ Land is of least environmental value; The location is already residential; On same side of main road as school and amenities; Not intrusive to character of the village; No heritage assets on site; No nature reserve on site”. They also disagree that the Cordy Lane site would be contrary to Green Belt policy on merging grounds.

- Borough Councillor John Handley has submitted representations supporting the comments of the Parish Council and Steering Group.

Kimberley Town Council:

- Considers that part of the site allocated south of Eastwood Road Kimberley in Policy 7.2 is of high biodiversity value and should be deleted from the allocation.
- Considers that Policy 7.1, site allocation for land south of Kimberley including Kimberley Depot, should include a reference to a development brief to be prepared as part of the Kimberley Neighbourhood Plan.

Stapleford Town Council:

- Objects to Policies 3.3 and 3.4, site allocations east and west of Coventry Lane. The Town Council considers that these are important Green Belt areas, separating the town from Bramcote and Wollaton, and are an integral part of an important Green Belt corridor between the Borough and the City. It also considers that both sites would be isolated from the main infrastructure of the town, with no public transport or nearby facilities; residents would therefore merely live within the development and find their needs met elsewhere, and so would contribute little to the local economy or the regeneration of Stapleford. Development would also add to existing traffic problems and would lead to pressure for further development.
- The Town Council is concerned that the proposals in Policy 3.2, Toton site allocation, are “different from proposals expressed by D2N2 for the same area”. This part of the Plan should therefore be “re-written following full consultation with D2N2, the Town Council and other interested parties”.
- Borough Councillor Richard MacRae has submitted representations supporting many of the Town Council’s comments, including those regarding the site allocations west of Coventry Lane and at Toton.

Bramcote Neighbourhood Forum:

- With regard to Policy 3.1, Chetwynd Barracks site allocation, the Forum considers that the policy should specify a minimum density of 40 dwellings per hectare, should not require a small retail/service centre, and “the extent of the

public space [to the south of the memorial] should be made clear and the reasons for not allocating that land for housing should be reported”.

- Considers that Policy 3.2, Toton site allocation, should say that “any leisure hub at the western end of the borough ought to be in addition to the one at Bramcote”.
- Objects to Policy 3.3, site allocation east of Coventry Lane. Reasons for objection include: “no exceptional circumstances exist for allowing 300 homes to be developed on the green belt – the financial straits of a private company can hardly be considered a matter for planning”; more sites within the existing urban areas should be used, including “the air space above the bus tram interchange in Beeston Town Square”; Bramcote has “an enormous and unfair share of the burden of new housing allocation”; the Sustainability Appraisal is “flawed” because it does not refer to the loss of Green Belt; the 2015 Green Belt Review was “flawed” and “skewed”; part of the site is a Local Wildlife Site, “the last remnant of Bramcote Moor”; “the figure of 300 houses is not justified and is at odds with both the objectively assessed need for Bramcote (ca 180 houses over the plan period) and the various statements by the leasers of this land of 350 or 450-500 homes”; there should be a greater housing density, “accompanied by a requirement to pay for a replacement leisure centre”; the policy aspiration for a replacement leisure centre should not be referred to as “(if required)”; the stability of the Moor Lane cutting should not be compromised by the removal of any vegetation; and any development should include “provision of a dropping off area and school walking buses”.
- Strongly supports Policy 11, site allocation at The Square, Beeston.

Chetwynd: The Toton and Chilwell Neighbourhood Forum:

- Proposes additions and amendments to the Key Development Requirements for the Chetwynd Barracks site allocation, Policy 3.1. These include: “the Barracks must be treated as one entity and not split up into separate development plots”; access to the site for buses (only) from Chetwynd Road, Chilwell; a new access road to the site from the north; Green Infrastructure corridors should include footpaths and cycle ways; sports facilities at the south-east of the site should be enhanced; all large trees should be subject to Tree Preservation Orders; public access should be provided to all heritage assets on the site; and the retail/service centre should be “sufficient” rather than “small”.
- Proposes additions to the justification text for the Toton site allocation, Policy 3.2. These include: any residents only parking scheme should be at zero cost to residents; Green Infrastructure routes between Toton and Chilwell should be 50 metres wide; the Green Infrastructure route to the northern boundary can be treated as an “informal greenspace” corridor; and reference should be added to a Green Infrastructure route along the Erewash River, between Toton Washlands and Stapleford.

East Midlands Councils:

- Supports Policies 3.1 and 3.2, site allocations at Toton and Chetwynd Barracks, and says that it will continue to work closely with Broxtowe and other relevant authorities and bodies to take forward the East Midlands HS2 Growth Strategy.

The Coal Authority:

- With regard to all site allocations, the Authority comments that “we would expect all relevant constraints and considerations in respect of coal mining legacy and surface coal resource issues to have been identified at the initial stage when the sites were being considered for allocation in order to ensure that potential risks have been identified”.

Severn Trent:

- Has provided assessments of the ‘Potential impact on sewerage infrastructure’ for most of the proposed site allocations, together with detailed comments. The assessments are: ‘Low’ for the allocations at Chetwynd Barracks, east of Coventry Lane, Beeston Maltings, Beeston Cement Depot, Wollaton Road Beeston, Brinsley and Walker Street Eastwood, Policies 3.1, 3.3, 3.6, 3.7, 3.8, 5.1 and 6.1; ‘Medium’ for west of Coventry Lane, Awsworth and Kimberley, Policies 3.4, 4.1 and 7; and ‘High’ for Toton, Policy 3.2.

Ministry of Defence, Defence Infrastructure Organisation:

- “has no objection to proposals for future development within the Borough of Broxtowe”.

Sport England:

- With regard to Policy 3.1, Chetwynd Barracks site allocation, Sport England (SE) says that “there is no mention of playing fields on site within the description”, draws attention to existing use of the site for sport and says that the Council’s Playing Pitch Strategy highlights the need to convert the tennis courts to an artificial grass pitch.
- Refers to Policy 3.2, Toton site allocation, and notes that the allocation includes a school site and playing pitches within the area.
- With regard to Policy 3.3, site allocation east of Coventry Lane, SE appears to suggest that the description of the site as unused is incorrect and refers to the references to the site in the Playing Pitch Strategy. SE also says that it should be ensured that any development does not prejudice the use of existing facilities at Bramcote School and the Leisure Centre.
- With regard to Policy 3.5, Severn Trent Beeston, SE wants there to be no negative impacts on the adjacent sports pitches. It also mentions the reference to the Nottingham Casuals site in the Playing Pitch Strategy.
- Says that cricket, football and rounders pitches at Walker Street Eastwood, Policy 6.1, should be protected from development.
- Refers to the reference in Map 3 to the existing mixed use commitment which covers Trent Vale sports club and says that “details of the allocation should be provided to ensure the facilities are retained as playing fields and upgraded to sufficient standards as detailed within the Playing Pitch Strategy”.

Sustrans:

- Makes various detailed and inter-related comments about the Great Northern Path corridor (which links with Bennerley Viaduct and runs to Hempshill Vale) in relation to Policies 4.1, 7.1 and 7.2, site allocations at Awsworth and Kimberley. For all these sites, the Key Development Requirements should include enhancing and making improvements to the Great Northern Path and

its Green Infrastructure corridor, and creating good quality walking and cycling links to the Path. For Policy 7.1, this should include “creating a key missing section of the Great Northern path through the site itself”. For Policy 4.1, additional requirements should include: safe pedestrian and cycling crossing points across the bypass, including a toucan crossing; enhanced walking and cycling routes to Ilkeston Railway station; and enhancements to the Erewash Valley Trail in the vicinity of the site. Sustrans makes several detailed “preliminary recommendations” concerning implementation of the Great Northern Path route; however it recommends that the policies should include references to a proposed feasibility study which would inform the improvements that would be necessary. (These are likely to include a new foot/cycle bridge across the A610 and a route through the centre of Kimberley.) Sustrans recommends that developer contributions are sought for these purposes.

Home Builders Federation:

- The Home Builders Federation make various comments relating to Policy 2, Site Allocations, and to the overall provision of housing in the Plan, however it does not comment on the merits or otherwise of individual sites. The HBF considers that the Council’s ‘contingency’, beyond the Core Strategy requirement, of 597 dwellings (9.7%) is below the recommendations of DCLG and is unlikely to provide sufficient flexibility for unforeseen circumstances. The HBF agrees with the Council’s use of the ‘Sedgefield’ approach to ‘shortfalls’ when calculating five-year housing land supply, with a 20% ‘buffer’. However the HBF disagrees with the Council not applying the ‘buffer’ to the ‘shortfall’. The HBF also considers that the small site windfall allowance of 195 dwellings in the five-year housing land supply is too high and considers it unclear whether an 8% non-implementation allowance has been applied to the overall housing land supply. It concludes that further site allocations are required, “to provide a greater overall housing land supply contingency and a five-year housing land supply on adoption of the Plan”. It also says that the Council should consider “the allocation of deliverable reserve sites with an appropriate release mechanism”.

HS2 Ltd:

- With regard to Policy 3.2, Toton site allocation, and the justification text, the company “are supportive of the Local Plan as it acknowledges the potential benefits that could be gained for the region from the arrival of Phase Two of HS2”. It also notes that “HS2 have established that a passive provision for the proposed tram can be provided to enable connection to the East Midland Hub”.

Beeston and District Civic Society:

- Considers that the field at the end of Cornwall Avenue should be excluded from the Severn Trent site allocation, Policy 3.5, and designated as Local Green Space. The field to the rear of East Crescent and Elswick Drive “could be included as a green buffer between existing housing and the Severn Trent site”.

- Considers that Policy 10, site allocation at The Square Beeston, should include “a coherent detailed design policy” rather than “a review process”. Residential development should include “a requirement for a mix of types/affordability”. There should be “a requirement for active frontages at ground floor level” and the development must be “coherent and futureproof”. There should be “flexible public open space with a community feel”, pedestrian connectivity should be emphasised and development should “reflect and enhance the quality of adjacent open space and Conservation Areas”.

Beeston Wildlife Group:

- Considers that the field at Cornwall Avenue should be removed from the Severn Trent site allocation, Policy 3.5, and designated as Local Green Space.

Brinsley Vision (representing 70 residents of Brinsley):

- Supports Policy 5.1, Brinsley site allocation. However it proposes the addition of a requirement to plant mature trees between the development and existing properties. It proposes the removal of two photographs which it considers to be outdated and suggests that some of the opposition to this allocation may partly be based on a misunderstanding of the extent of the site.

Broxtowe Labour Group:

- “Broadly welcome” the site allocations but “have some concerns” that there will be “significant pressures on both community and transport infrastructure”, including the A6005 and roads at Awsworth and Chilwell.
- Considers that Policy 3.1, Chetwynd Barracks site allocation, should include provision for a network of footpaths.
- Supports Policy 3.2, Toton site allocation.
- Considers, with regard to Policy 3.4, site allocation west of Coventry Lane, that “consideration must be given to the preservation of a green corridor that runs between the North and the South of the borough”.
- Considers that Policy 3.5, Severn Trent site allocation, should exclude the ‘Horses Field’ at Cornwall Avenue.
- Regarding Policy 4, Awsworth site allocation, the Group proposes an additional allocation for a freight terminal at ‘Bennerley Washings’.
- Considers that Policy 7.1, site allocation south of Kimberley, should continue to exclude Kettlebrook Lodge.
- Supports Policy 11, site allocation at The Square Beeston, and makes several proposals for the detail of the development.

Friends of Brinsley Headstocks Heritage and Nature Reserve:

- Objects to Policy 5.1, Brinsley site allocation, and prefers the Cordy Lane option, to avoid harm to the Headstocks Heritage and Nature Reserve and because “it keeps the village on the same side of the main road”.

Friends of Vine Cottage:

- Objects to Policy 5.1, Brinsley site allocation, and prefers the Cordy Lane option, on grounds of heritage, wildlife, precedent and highway safety.

Nottinghamshire Campaign to Protect Rural England:

- Considers that site allocations east and west of Coventry Lane and at Beeston Cement Depot, Awsworth, Brinsley and Kimberley, Policies 3.3, 3.4, 3.7, 4.1, 5.1 and 7.1, should require provision for bus services into and through the sites, rather than adjacent to the sites. The CPRE says that these comments are supported by Nottinghamshire Campaign for Better Transport.

Nottinghamshire Scouts, Beauvale Scouts and 1st Kimberley Guides:

- Consider that Policy 7.1, site allocation south of Kimberley, should not include Kettlebrook Lodge.

Nottinghamshire Wildlife Trust:

- Supports the Key Development Requirement regarding Green Infrastructure corridors in policy 3.1, Chetwynd Barracks site allocation. Considers that a statement should be included that Hobgoblin Wood, other woodland, mature trees and grasslands will be retained and their management secured in perpetuity.
- Objects to Policy 3.2, Toton site allocation. Reasons for objection include loss of Green Belt, “resulting in the merging of Chilwell and Stapleford”, loss of a wildlife corridor between the Erewash Valley and Wollaton Park, transport issues and flood risk. If the Policy remains, the Trust considers that all Local Wildlife Site habitat should be removed from the allocation and that it should be stated that the open space (which the Trust welcomes) should include a significant amount of informal open space / wildlife habitat, including a 50 metre wide habitat corridor.
- Objects to Policy 3.3, site allocation east of Coventry Lane, if the entire site is to be developed. The Bramcote Moor Grassland Local Wildlife Site (LWS) should be removed from the allocation site, or the policy should say that the LWS will not be developed. Buffering and management of the LWS should also be secured. (The Trust states that LWSs “can be of SSSI quality or can be even more important than SSSIs for wildlife. We therefore consider protection of this network of sites to be of the utmost importance”.)
- Objects to Policy 3.4, site allocation west of Coventry Lane, because of encroachment into the countryside and because “local needs have been met by the adjacent Field Farm site”. However welcomes the Key Development Requirements regarding Green Infrastructure. If the allocation remains, the Trust considers that there should be clarification of the extent of the Green Infrastructure corridor and of linkages between the site and Field Farm.
- Considers that the field at the end of Cornwall Avenue should remain undeveloped in policy 3.5, Severn Trent site allocation. Clarification should also be made as to the extent of the Green Infrastructure and its long-term management.
- In Policies 3.6 and 3.7, Beeston Maltings and Cement Depot site allocations, considers that there should be a Key Development Requirement for the provision of a Green Infrastructure link along the railway line.
- Objects to Policy 4.1, Awsworth site allocation, because of potential impacts on toads and other species. If the allocation remains, the Trust considers that there should be retention of substantial Green Infrastructure, incorporation of existing hedges, retention of some meadows and protection of common toads, “should they still occur”.

- Objects to Policy 5.1, Brinsley site allocation and consider that it should be replaced by the Cordy Lane site. Reasons include potential harm to the Brinsley Headstocks Local Nature Reserve, likely greater value for birds and other kinds of wildlife, and possible hydrological impacts on Brinsley Brook.
- Welcomes the retention of The Canyons in Policy 6.1, Walker Street Eastwood site allocation. Considers that Green Infrastructure / habitat corridors should be provided and enhanced across the site.
- Regarding Policy 7.1, site allocation south of Kimberley, the Trust would like to see a statement about the extent of the developable area, “ideally limiting it to the built up part of the site”. It also considers that the disused railway, which is a LWS, should be buffered and have its management secured.
- Objects to Policy 7.2, site allocation south of Eastwood Road Kimberley, which it considers forms an important wildlife corridor in conjunction with the adjacent woodland.

Pedals (Nottingham Cycling Campaign):

- Supports reference to cycling in Policies 3.1, 3.2 and 3.7, site allocations at Chetwynd Barracks, Toton and Beeston Cement Depot.
- Considers that Policies 3.3 and 3.5, site allocations east of Coventry Lane and at Severn Trent Beeston, should refer specifically to the need for good cycle access, as well as pedestrian access.
- Considers that Policies 4.1, 7.1 and 7.2, Awsworth and Kimberley site allocations, should refer specifically to the need for cycling as well as pedestrian links, including crossing of the Awsworth bypass, and endorses Sustrans’ comments.

Spring Bank Farm Care Home, Brinsley:

- Objects to Policy 5.1, Brinsley site allocation, and supports the Cordy Lane option, because associated noise would be “intolerable” for many of the people with learning disabilities who use the Care Home, and for reasons relating to safety, wildlife and “visually peaceful space”.

Retail Landowners / Developers**(6053) British Land Company (represented by WYG) -Landowner of Giltbrook Retail Park:**

Policy 1 Flood Risk: Should be amended to make clear that ‘minor development’ is excluded from the sequential or exception tests.

Policy 10 Town Centre and District Centre Uses: Primary frontage should be defined in the justification text. Primary frontage calculation should be defined set out more clearly. The policy will have negative implications for the vitality and viability of the town centre and criteria (i) should be removed from the policy.

Policy 12 Edge-of-Centre A1 Retail in Eastwood: No need for this policy given that Morrisons is now ‘out-of-town’ retail and therefore covered by Policy 13, unclear why it should be treated differently. Primary Frontage is not defined in policy text and extends beyond what is considered reasonable.

Policy 13 Proposals for main town centre uses in edge-of-centre and out-of-centre locations: Town centres in Broxtowe cannot accommodate all the different types of retail development. Giltbrook Retail Park should be recognised as the most appropriate location for out-of town development to allow it to grow/develop in the future.

Policy 17 Place-making, Design and Amenity: Policy is too prescriptive and Council should solely rely on Policy 10 of the ACS.

Policy 20 Air Quality: Definition of ‘significant deterioration of air quality’ required. Level of provision of electric charging points that will be required for different types of development should be set out and justified.

Policy 24 The Health Impacts of Development: Further clarity required as to definition of ‘significant adverse impact’ within policy justification. Unclear how criteria ‘c’ would be triggered if a Health Impact Assessment hadn’t already been carried out. Possibly no need for criteria ‘b’. More information is needed regarding the type of mitigation that may be required.

Policy 26 Travel Plans: Threshold used is arbitrary and should be circumstantial.

Policy 31 Biodiversity Assets: Criteria ‘g’ (re: trees and hedges) unnecessary and disproportionate as could negatively hinder any development – should be restricted to trees and hedges in a Conservation Area or within the setting of a Listed Building.

Policy 32 Developer Contributions: Threshold within policy should be removed so should apply regardless of size or type of development. Policy is too focused on financial contributions and doesn’t recognise on/off-site mitigation that could be achieved.

(6901) Henderson UK Retail Warehouse Fund (represented by Burnett Planning) – landowners of Chilwell Retail Park

Policy 13 Proposals for main town centre uses in edge-of-centre and out-of-centre locations: Out-of-town retail should be supported and allowed to grow in tandem with the town centres. The retail study has been taken out of context. The local floorspace threshold is unnecessary (part 1 of the policy) because part 2 of the policy deals with the possible impact. Part 1 (b) threshold introduces a test of 'need' for smaller retail developments which is contrary to the NPPF requirements. Part 1(c) would render the threshold ineffective as every proposal would need an impact assessment. The threshold should not be applied around Beeston Centre as this is more viable and therefore should not be subject to the same thresholds as other smaller centres in the borough. 1,000sqm around Beeston would be more appropriate. Floorspace impact should not apply to 'food and drink', 'leisure' or 'office'.

(4122) McDonalds (represented by Planware Ltd)

Policy 24 Health Impacts of Development: Not appropriate to have a blanket restriction of A5 uses near schools and a lack of evidence to justify policy. No maps to show where the restriction would apply and therefore unclear/conflict with the NPPF.

Leisure Facilities Landowners / Developers**(6903) Beeston Fields Golf Club (represented by Stone Planning Services) – landowner in Beeston**

Policy 27 Local Green Space: Object to the Golf Course being designated as Local Green Space in its entirety as it does not meet the criteria. Paddocks off Beeston Fields Drive and the area north of Bramcote Drive could meet the criteria for Local Green Space and does not form part of the functional Golf Course but believe that none of it should be designated as such.

Policy 31 Biodiversity Assets: Biodiversity designation for the golf course should be removed, only the eastern side of the golf course has any biodiversity merit.

Employment Land Owners /Developers**Awsworth:****(2607) Harworth Group (Represented by Pegasus Group) – Landowner of Land adjacent to Bennerley Viaduct**

Policy 9 Retention of Good Quality Existing Employment Sites: Plan fails to consider the need for new rail related employment opportunities that relate to HS2. Promoting a site in Awsworth which should be allocated for employment development.

(1201) Whitehead (Concrete) Ltd & Foulds Investment Ltd (represented by iPlan Solutions Ltd) – landowner/business owner in Awsworth

Policy 2 Site Allocations: Site allocations focus solely on residential and there is no provision for employment allocations. Promoting a site in Awsworth which should be allocated for employment development.

Policy 4 Awsworth allocations: Site allocations focus solely on residential and there is no provision for employment allocations. Promoting a site in Eastwood which should be allocated for employment development.

Policy 8 Development in the Green Belt: Site allocations focus solely on residential and there is no provision for employment allocations. Object to landscape evidence as area assessed is too broad. Promoting a site in Awsworth which should be allocated for employment development.

Eastwood:**(178) Caunton Engineering Ltd (represented by iPlan Solutions Ltd) – landowner/business owner in Eastwood**

Policy 2 Site Allocations: Site allocations focus solely on residential and there is no provision for employment allocations. Promoting a site in Eastwood which should be allocated for employment development.

Policy 6 Eastwood Allocations: Site allocations focus solely on residential and there is no provision for employment allocations. Promoting a site in Eastwood which should be allocated for employment development.

Policy 8 Development in the Green Belt: Site allocations focus solely on residential and there is no provision for employment allocations. Object to landscape evidence as area assessed is too broad. Promoting a site in Eastwood which should be allocated for employment development.

Housing Land Owners / Developers**Main Built up Area (MBA)****Chilwell****(6284) Defence Infrastructure Organisation (DIO) (represented by JLL) – landowner of the Chetwynd Barracks allocation**

Policy 3.1 Chetwynd Barracks Allocation: Support allocation, site will be available for development from 2021. Approach to allocation is inconsistent with the Toton site however in that it should set out its vision for development of the site beyond the plan period; suggest modifications that they believe will rectify the issue.

Policy 23 Proposals affected designated and non-designated heritage assets: Policy is too generic; there should be a clear distinction between designated and non-designated heritage assets and how they will be treated, policy should be separated to clarify the distinction made in national policy. Point 2 of the policy does not appropriately define harm (i.e. substantial and less than substantial).

Bramcote

(6048) White Hills Federation Trust (represented by Barton Willmore) - landowner of the Bramcote housing allocation and a substantial part of the school redevelopment area

Policy 3.3 Bramcote Housing Allocation: Support allocation but request changes to the 'key development requirements'. Site capacity should be increased to 500 dwellings (with a potential reduction on the adjacent Stapleford allocation). Amend wording of policy so that the commitment to slow the speed of traffic along Coventry Lane is linked only to the road frontage of the site. Object to the requirement that the housing and the delivery of the new school should be dependent on each other. 30% affordable housing provision will not be met.

(6925) Hillside Gospel Hall Trust (Represented by Pegasus Group) – Landowner within the Bramcote Local Green Space Designation

Policy 3.3 Bramcote Housing Allocation: Gospel Hall Trust land should be included within the housing allocation at Bramcote (rather than the local green space) as it is previously developed and available for redevelopment.

Policy 27 Local Green Space: Gospel Hall Trust land should not be included in the Local Green Space designation as it does not meet the designation criteria (it is previously developed and not accessible by the public). It should be included within the housing allocation to the north.

(3305) Bartons Plc – Landowner of a housing site recognised as a commitment

Policy 3 (as a whole): Confident that their housing commitment can be brought forward very soon.

(6879) Crampin, Barden and Scott (represented by SSA Planning Limited) – landowner of land adjacent to The Lawns Moss Drive Bramcote

Policy 3 Main Built up Area allocations: Unclear whether the Council has a 5 year land supply and smaller sites can help to contribute towards achieving one. Promoting an alternative housing site in the Main Built up Area (in Bramcote) which is not included as an allocation in the Local Plan.

Policy 8 Development in the Green Belt: Unclear whether the Council has a 5 year land supply and smaller sites can help to contribute towards achieving one. Promoting an alternative housing site in the Main Built up Area (in Bramcote) which is not included as an allocation in the Local Plan.

Policy 27 Local Green Space: Replacement of 'prominent areas for special protection' with 'local green space' is inappropriate in the case of Burnt Hill Bramcote which could be protected by the Landscape policy and does not meet the criteria. This would allow the development of their site which is being promoted as an alternative housing site in the Main Built up Area (in Bramcote) which is not included as an allocation in the Local Plan.

Stapleford:

(1462) Rogers Family (represented by GraceMachin Planning & Property) – Landowner of part of the Stapleford allocation (Hulks Farm)

Policy 3.4 Stapleford Allocation: Support allocation, it is available, suitable and deliverable.

(718) J McCann& Co (Nottingham) Ltd (represented by Planning and Design Group) – Landowner of part of the Stapleford allocation

Policy 2 Site Allocations: Plan supports provision of new homes through allocation and provides market confidence which boosts the supply of new homes delivered.

Policy 3.4 Stapleford Allocation: Sustainable allocation will contribute towards the delivery of new homes. Supports a plan-led approach and can deliver houses within the 5 year supply.

Policy 15 Housing size, mix and choice: Paragraph 8 of policy (re: custom & self-build) is unsound. Not evidenced and Council haven't documented demand from the register. Policy should support delivery rather than mandate it.

Policy 17 Place-making, design and amenity: Paragraph 3 of policy (re: Building for Life 12) unsound because not justified. Building for Life has been withdrawn from planning guidance and therefore should not be included, should use reference to wider good design principles to assure high-quality development.

Policy 32 Developer Contributions: Policy should be based on viability information (specifically that provided by developers) and that the approach should be collaborative. Reference to submissions of viability appraisals should be included within the text.

(6881) Mr Taylor (represented by Featherstones) – landowner of Hill Top Farm Stapleford

Policy 2-7 (all housing allocations): Concerns regarding approach to housing delivery how will it be achieved, is it flexible enough? No mechanism to release further sites. Promoting an alternative housing site in the Main Built up Area (in Stapleford) which is not included as an allocation in the Local Plan.

(2652) W Westerman (represented by Oxalis Planning Ltd) – landowner off low wood road Nuthall

Policy 2-7 (all housing allocations): Concerns regarding approach to housing delivery how will it be achieved, is it flexible enough, do the Council have a 5 year land supply? The plan should increase the overall housing provision (to at least 7380 over the plan period). No mechanism to release further sites. Promoting an alternative housing site in the Main Built up Area (Nuthall) which is not included as an allocation in the Local Plan.

Beeston**(2716) Network Rail – land owner of site allocation 3.7 (Cement Depot)**

Policy 3.7 Cement Depot Beeston: Support allocation but believe that the housing allocation should be increased from 21 dwellings to a minimum of 40 dwellings (with the potential to provide up to 100 dwellings).

Toton Strategic Location for growth**WYG on behalf of Peveril Homes and UKPP (Toton)**

Refer to the planning history including the Core Strategy allocation, the outline planning permission and the reserved matters application which is pending decision.

Policy 3.2 is considered to be overly restrictive in not realising the Core Strategies objective of 500 homes being the minimum required over the whole strategic location of which their clients application site forms a part, requiring 40 dwellings to the hectare which is at odds with other allocations and not needed given policy 15 in the Plan deals appropriately with issues of housing density, and the green buffer at the south of the site should not be regarded as a buffer for amenity purposes (Policy 28) and a width of 10m would be acceptable.

Housing delivery is low in Broxtowe amounting to 50% of required delivery in the first 6 years of the Core Strategy period. The Part 2 Local Plan anticipates delivery of over 1000 units by 2020/21 against an average of 137 thus far. The Part 2 Local Plan should be as flexible as possible to ensure housing sites are brought forward for development with particular reference to overall plan delivery (surplus of just under 600 dwellings) and 5 year supply (surplus of 11 dwellings) which gives very little room for slippage. Given this, the current approach in the plan is not considered to amount to a sufficiently robust position to ensure the housing needs of the Borough can be met within the current plan period, and increasing the flexibility of the allocation at Toton will ensure more housing can be delivered in this highly sustainable and deliverable location without further Green Belt release.

Masterplan and proposed uses should be reconsidered with reference to Peveril Securities representations on the proposed masterplan dated 23rd November 2015. Land East of Toton Lane should include the potential for land in all A use classes, B1 (a and b), C1, C2, C3, D1 and D2 which will enable the area to respond positively to the housing requirements at Toton and Chetwynd. The need for a wide green corridor along the southern boundary of the land east of Toton Lane is excessive and could make sustainable development unviable as the access point at land to the west of Toton Lane is fixed and too wide green corridor would leave no development value to the south of the site. The Japanese water gardens adjacent to Bardills should be excluded from the Green Belt with defensible boundaries with a bank of trees and it being unnecessary to keep the land permanently open particularly in the context of housing requirements, reference to OPUN being supportive of the principle of housing to the east of Toton Lane in their design review of the location.

Barton Willmore on behalf of Mr Sahota

Has interest in land at Toton Sidings.

Policy 3.2 supports the allocation but considers that a full masterplan should be considered prior to exact details being identified. They would object to any site specific requirements that may prejudice development of their site and reserve the right to be involved in any masterplanning exercise.

Policy 28 objects to the inclusion of land in the vicinity of the HS2 station being restricted via a policy when wider opportunities for management and enhancement may arise in accordance with a wider masterplan. Also concern with the wording of the policy that requires improvement of the asset itself where there may be opportunities for off-site enhancements. The policy should be more flexible.

Policy 31.1a objects to the inclusion of land in the vicinity of the HS2 station being restricted via a policy when wider opportunities for management and enhancement may arise in accordance with a wider masterplan. Section 2 is welcomed re benefits can be considered to outweigh harm and there may be opportunities for off-site enhancements. The policy should be more flexible.

Green Belt release are supportive

Oxalis and fpcr on behalf of Bloor Homes

Policy 3.2 is considered overly restrictive both in terms of its geographical extent and in terms of its ambition. It fails to make best use of the opportunities HS2 will bring and their alternative vision (called Broxtowe Gateway) includes land further north east for a comprehensive development to include

- New works to eliminate traffic congestion
- Up to 4000 new jobs
- Retention of the Green Belt north of Toton and Chilwell
- Up to 1200 dwellings alongside the NET

They consider their detailed landscape work addresses the concerns raised in the Tribal Study regarding development on the east of Toton/ Stapleford Lane with a large landscape buffer including new woodland at the north, they propose significantly more publicly accessible green infrastructure at various locations within the strategic location including wide publicly accessible space along the southern area of the whole strategic location , with additional housing on land to the east and a transport solution that includes an access point off the A52 east of Bardills Island linking to the second access off the A52 further west.

Awsworth**(2607) Harworth Group (Represented by Pegasus Group) – Landowner of Awsworth Allocation**

Policy 4.1 Awsworth specific allocation: Support the allocation. Barlow's Drive North access is unlikely to be required and so 'aspirations' should be amended. Could be largely delivered in the 5 years period.

Brinsley**(717) Mr & Mrs Anthony (represented by Guy Taylor Associates) – landowner of land off Church Lane the Brinsley allocation**

Policy 5.1 Brinsley Allocation: Support policy, site is sustainable and will deliver a mix of homes including fulfilling the 30% affordable housing requirement and can be delivered within 5 years.

(6566) Richborough Estates (represented by Fisher German) – Landowner of Land north of Cordy Lane Brinsley

Policy 5 (as a whole): Concerns regarding the delivery of the allocation off church Lane in Brinsley when considering the site constraints. Promoting an alternative housing site in the Brinsley which is not included as an allocation in the Local Plan.

(5920) Mr Soult (represented by GPS Planning and Design Ltd) – Landowner of land to rear of Broad Lane/ Clumber Avenue Brinsley

Policy 5 (as a whole): Concerns regarding the evidence and the site selection process in Brinsley. Over reliance on the ability of a single site to deliver housing rather than a number of smaller sites. Promoting an alternative housing site in the Brinsley which is not included as an allocation in the Local Plan.

Eastwood**(4200) Taylor Burrows Property (Represented by Phoenix Planning (UK) Ltd) – Land owner of Wade Printers (Green Belt site)**

Whole Plan: Plan will only be in effect for 9 years (and not the minimum of 10).

Policy 3 (as a whole): Object to the reduction in housing requirement in Eastwood and the increase in the Main Built up Area. Eastwood is a sustainable location in need of regeneration and growth of affordable and market housing. Concern is raised regarding the deliverability of the sites in the Main Built up Area based on site specific constraints. Over-reliance on higher housing market areas which means that more deprived areas do not benefit from the S106 money that development will bring. Promoting an alternative housing site in Eastwood which is not included as an allocation in the Local Plan.

Policy 5 (as a whole): Brinsley is not a sustainable location and constraints on site raise concern regarding delivery. Alternative sites in Eastwood should be allocated instead. Promoting an alternative housing site in Eastwood which is not included as an allocation in the Local Plan.

Policy 6 (as a whole): There is under provision in Eastwood as the ACS figures are not being met. Object to the reduction in housing requirement in Eastwood and the increase in the Main Built up Area. Eastwood is a sustainable location in need of regeneration and growth of affordable and market housing. Concern is raised regarding the deliverability of the sites in Eastwood and the Main Built up Area. Viability in Eastwood is affected by the low market value but would be improved in greenfield sites were allocated. Over-reliance on higher housing market areas which means that more deprived areas do not benefit from the S106 money that development will bring. Promoting an alternative greenfield housing site in Eastwood which is not included as an allocation in the Local Plan.

Policy 7 (as a whole): Concern is raised regarding the deliverability of the sites in Kimberley. Alternative sites in Eastwood should be allocated instead. Promoting an alternative housing site in Eastwood which is not included as an allocation in the Local Plan.

SHLAA: Should have been updated prior to consultation. No 5 year land supply. Concern is raised regarding the deliverability of some sites which should be removed from the land supply.

Housing Trajectory: Build out rate is unrealistic. 'Pay back' won't be until 20/21. Concern is raised regarding the deliverability of some of the sites.

SHMA: Housing projections used in evidence base are out-of-date.

(2685) Bloor Homes Ltd (represented by Oxalis Planning Ltd) – landowner of land at Nether Green, east of Mansfield Road, Eastwood

Policy 2-7 (all housing allocations): Concerns regarding approach to housing delivery how will it be achieved, is it flexible enough, do the Council have a 5 year land supply? The plan should increase the overall housing provision (to at least 7380 over the plan period). No mechanism to release further sites. Promoting an alternative housing site in the Eastwood which is not included as an allocation in the Local Plan.

Policy 15 Housing size, mix and choice: Object to the requirement for custom/self-build homes on large sites as it creates issues for the housebuilder (including impact on viability). It would be more appropriate to identify small sites.

Policy 17 Place-making, Design and Amenity: Criteria 1b and 1c should be removed as they are concerned with the location of development and not its built form.

(6980) The Pickering Family (represented by GraceMachin Planning & Property) – landowners of land north of Mill Lane Eastwood

Policy 6 Eastwood Allocations (as a whole): There is under provision in Eastwood and the Core Strategy requirement is not being met. Concern regarding the 5 year land supply and lack of flexibility within the plan to ensure housing delivery with the suggestion that additional sites are required. Promoting an alternative housing site in the Eastwood which is not included as an allocation in the Local Plan.

Kimberley:**(6880) Davidsons Developments Ltd. (Represented by Pegasus Group) – landowner at New Farm Lane Nuthall**

Policy 7 (as a whole): There is under provision in Kimberley as the Core Strategy figures are not being met. Council has no 5 year land supply and allocations do not provide sufficient flexibility to ensure delivery. Promoting an alternative housing site in Kimberley which is not included as an allocation in the Local Plan.

(2542) Mrs Viitanen (represented by Featherstones) – landowner of Gilt Hill Farm in Kimberley

Policy 2-7 (all housing allocations): Concerns regarding approach to housing delivery how will it be achieved, is it flexible enough? No mechanism to release further sites. Promoting an alternative housing site in Kimberley which is not included as an allocation in the Local Plan.

(4622) Mrs Barnes (represented by Featherstones) – landowner of land off back lane, Nuthall

Policy 2-7 (all housing allocations): Concerns regarding approach to housing delivery how will it be achieved, is it flexible enough? No mechanism to release further sites. Promoting an alternative housing site in Kimberley which is not included as an allocation in the Local Plan.

(634) The Wilds (represented by Aspbury Planning Ltd) – landowner of land off Alma Hill

Policy 7 (all Kimberley allocations): Further allocations needs to be made in Kimberley due to double counting in the land supply, the shortfall from meeting the ACS target and concern regarding the delivery and capacity of the proposed allocations. Promoting an alternative housing site in Kimberley which is not included as an allocation in the Local Plan.

(1436) Mr and Mrs Evans (represented by iba Planning) – landowners of land off Alma Hill.

Policy 7 (all Kimberley allocations): Concern regarding the approach to site selection (particularly the Green Belt Review) and housing delivery including meeting the requirement set out in the Core Strategy. There is not enough flexibility built into the

approach to allocations and no allowance should a site not come forward for development at the time envisaged. Further Green Belt boundary change is needed to ensure the plan endures beyond the plan period or land should be safeguarded. Promoting an alternative housing site in Kimberley which is not included as an allocation in the Local Plan.

(4193) Mr Turton (represented by Planning and Design Group) – landowner for land south of Kimberley Road

Policy 2 Site Allocations: Plan supports provision of new homes through allocation and provides market confidence which boosts the supply of new homes delivered.

Policy 7 Kimberley Allocations: Promoting an alternative site in Kimberley which is not included as an allocation in the Local Plan. Site promoted is within the existing urban area; it is deliverable within the plan period and should be allocated in addition to the other Kimberley allocations for 30 dwellings.

(2418) Mr Moulton (representing himself and represented by Beech Architects) – landowner of land off Church Hill Kimberley

Policy 7 Kimberley Allocations: The Council has incorrectly interpreted or has ignored the evidence in relation to the choice of housing site allocation in Kimberley. The Green Belt boundary is not defensible and restricts the size of the site so that the housing delivery will fall short of the Core Strategy requirement. Green Belt boundary should follow the line of the A610. Promoting an additional housing site in Kimberley which is not included as an allocation in the Local Plan.

**Housebuilder (without specific land interest)
(3756) Gladman Development Ltd.**

Policy 2 Site allocations: Council should ensure that there are a large number of small/medium sites across the borough which could be delivering houses at any one time. Delivery rates used in 5 year land supply calculations should be 30 dwellings per annum per developer. Buffer should be applied after the shortfall. There are no triggers for the further release of land.

Policy 15 Policy 15 Housing size, mix and choice: Concern regarding the viability of the plan as a whole. Self-build need is missing from the evidence base (SHMA). Provision of starter homes should be considered equivalent to affordable homes.

Policy 17 Place-making, Design and Amenity: Not appropriate to have a requirement for sites of 10 or more dwellings to score 9 or more 'greens' on building for life 12 or equivalent.

Policy 22 Minerals: Policy is overly onerous and will prevent sustainable growth.

Policy 23 Designated and non-designated heritage assets: Policy should recognise that there are two separate balancing exercises to be undertaken for designated and non-designated heritage assets. Designated heritage assets are assessed against their importance (with greater weight given to more important), non-designated

heritage assets are assessed as a balanced judgement regarding the scale of harm and significance.

Policy 27 Local Green Space: Question the justification of the Local Green Space at Bramcote/Stapleford as it appears to be an extensive tract of land and therefore doesn't meet the criteria.

Specialist Housing Providers

(6916) Rentplus (represented by Tetlow King Planning) – specialist Affordable Housing provider 'rent to buy'

Policy 15 Policy 15 Housing size, mix and choice: Part 6 of the Policy is well drafted in terms of flexibility and the ability it gives developers to bring forward appropriate housing to meet local need. The mix of affordable housing should be set out clearly in the Local Plan. The justification text should include detail of the general expectation for tenure split and should specify that a full range of tenures is encouraged with reference to national affordable housing policy (which is expected to change in the revised iteration of the NPPF).

(403) McCarthy & Stone Retirement Lifestyles Ltd. (represented by the Planning Bureau Limited)

Policy 2 Site Allocations: The Plan does not include a policy to promote the delivery of specialist accommodation for the elderly despite acknowledging that the population is aging. Viability assessments make a fixed land value assumption which jeopardises delivery. There are no specific allocations for elderly accommodation or consideration of sites suitability for specialist housing. There should be a presumption in favour of specialist housing provision including the release of land within a strategic allocation or a separate policy.

Policy 15 Housing size, mix and choice: Part 7 requirement for compliance with optional building regulations M4(2) standard whilst desirable is not practical or viable. Despite the justification text this policy will not be sufficient to meet the needs of the elderly population in the borough. Policy should encourage the delivery of specialist forms of sheltered/retirement housing (C3) and Extra Care (C2). The affordable housing requirement will mean that retirement housing will always be subject to review (as it won't meet the threshold) which could jeopardise delivery. The assumption of a fixed land value is not reflective of the market and is not consistent with the NPPF.

Other representations

Policy 3.3 Bramcote

- 17 contributors
- 16 objectors- 1 comments only

Reasons for objection included:

- Homes distribution across Broxtowe/density of Bramcote too high already
- Green Belt loss and GB v brownfield development- more should be on brownfield rather than greenfield
- Highways congestion, speeds and cumulative impact with other development; bus provision doubt; access- should include Moor Lane.
- Air quality
- Neighbourhood Plan non-cooperation, not favoured in the neighbourhood.
- Lack of Green infrastructure and break in corridor, protect LWS, landscape buffer needed to existing development
- Health provision infrastructure poor; no community provision
- No justification for education very special circumstances to release Green Belt; refurbish buildings first; financial viability uncertain.
- Highways congestion in wider area not mitigated. Congestion will increase at Jaguar roundabout, A52 and Moor Lane school access.

Policy 3 Stapleford

- 11 contributors- all object
- Homes distribution/density
- Green Belt loss and GB v brownfield development
- Highways congestion, speeds and cumulative impact with other development; bus provision doubt.
- Air quality
- Neighbourhood Plan non cooperation
- Lack of Green infrastructure and break in corridor, protect LWS, landscape buffer needed to existing development
- Health provision infrastructure poor; no community provision
- No justification for education vsc to release Green Belt.
- View from Stapleford Hill

Policy 3 Severn Trent Beeston

- 31 contributors- all objectors
- Inclusion of Cornwall Avenue field inappropriate; Green Infrastructure corridor- should be protected; historic environment- should be protected.
- Cumulative development.

Policy 3 Cement Depot Beeston

- 2 contributors- 1 supporter, 1 objector
- Positive use of brownfield site.
- Insufficient space for homes.

Policy 4 Awsworth

- 5 contributors- 4 objectors and a lead petitioner with 140 signatories objecting only to the means of access.
- Propose access from end of Newtons Lane onto Shilo Way.
- Alternatively use brownfield land rather than this greenfield.
- Loss of open space.
- Severe congestion and poor existing road infrastructure.
- Do not develop Bennerley Viaduct.
- Bus service with delays, not efficient enough to justify further development outcome.
- Site drainage and drains into Local Nature Reserve.
- Air quality and noise pollution.
- Negative wildlife impact.
- Alternatives near Ilkeston Rail Station/Cossall Industrial Estate and the A610 should be used instead.
- Potential crime.
- Possibility of abutting existing homes.
- Loss of View.

Policy 5 Brinsley

- 173 contributors- 167 objectors, 6 supporters.
- Allocate alternative Cordy Lane site.
- Potential harm to wildlife corridor and Local Wildlife Site.
- Potential harm to historic environment
- Noise and light pollution.
- Closes open space
- Poor design (contrary to NPPF 125)

- Removes link to Brinsley Headstocks.
- Reference to previous Inspectors Report reasoning for rejection.
- Landscape is a heritage asset.
- Potential harm to Local Nature Reserve.
- Brinsley Brook flood risk.
- Green Belt harm.
- Contrary to NPPF natural environment policy.
- Access detrimental to highway safety; severe impact of traffic levels.
- Impact on Willey Lane junction.
- Loss of tourism potential.
- Should designate as a Local Green Space alternative.
- Harm to village character.
- Harm to views.
- Harm to walking routes.
- Need to cross the A608 to access facilities.
- Loss of tranquillity.
- Encroachment into countryside.
- Incorrect data used for Green Belt review and no exceptional circumstances.
- Presence of bats.
- Flawed evidence.
- Harm to Recreation.
- Not an extension of residential area.
- Harm to mature hedgerows.
- Loss of cultural heritage.
- Links Recreation area and Conservation Area visually, detrimental.
- Loss of footpaths.
- Detrimental to healthy environment.
- Presence of red listed willow tit.
- Does not fit into the existing form of the village.
- Spoil rural character of the village- most of the existing homes are on other side of Cordy Lane. Would create suburbanisation.
- Potential harm to Brinsley Headstocks LNR- from pollution and disturbance, mining history and DH Lawrence connections, tourism. Added to proximity of green Brinsley Rec means too urbanising for area.

Policy 6 Walker Street, Eastwood

- 3 contributors- all objectors.
- Wildlife corridor and trees.
- Drainage.
- Mining subsidence settlement.

- Land stability and contamination.
- Traffic on surrounding roads; emergency vehicle access problem would be exacerbated.

Policy 7 Land south of Kimberley including Kimberley Depot

- 1 objector
- Traffic- all proposed homes on west side of Kimberley, therefore cumulative effect on traffic/parking on Eastwood Road.
- Landscape- loss of Mature Landscape Area, including trees and hedgerows.

Policy 2 Site Allocations

- 1 contributor- objector.
- Too vague
- Should be more positively prepared.
- Not evidence based.

Policy 3.1 Chetwynd Barracks

- 3 contributors- 2 objectors, 1 supporter.
- Support use of brownfield land.
- Site should contribute to a sub-area transport policy for Toton, Stapleford, Bramcote and Trowell, especially public transport.
- Character of site should match current- 800 homes at 25/hectare density, plus employment land, plus community infrastructure, in a 1:1 ratio to open space.

Policy 3.2 Toton

- 5 contributors- all objectors.
- Traffic plan should include Stapleford.
- Banks Road should be re-designed to be a through route, including bus service, serving the proposed developments.
- New accesses will negate the need for bus services to pass through Stapleford.
- Site should contribute to a sub-area transport policy for Toton, Stapleford, Bramcote and Trowell, especially public transport.
- Required density will promote flatted development not in keeping with local area.
- Development not required to support station.

- Broxtowe has a surplus of employment sites with under-used land changing to residential.
- The Core Strategy requires office use to increase proportionately to population, this could be done by the Boots Enterprise Zone.
- Industrial land usage expected to decline, so Toton land would be surplus.
- Conservation Area, and flood risk, to west.
- No need to extend school based on current usage.
- Should be deferred to next Local Plan for Green Belt consideration.
- Primary school provision needed rather than secondary.
- Green gap needed.

Policy 8 Development in the Green Belt

- 5 contributors- 4 objectors, 1 supporter.
- Use brownfield sites as an alternative.

Policy 9 Retention of good quality existing employment sites

- 1 contributor- objector
- Good quality not defined, therefore subjective.

Policy 11 The Square, Beeston

- 4 contributors- all objectors.
- No community development included, an omission.
- No public toilet provision or cultural green open space included.

Policy 12 Stapleford District Centre

- 1 contributor- objector
- Should not contract.
- Policy 6.2 of the Core Strategy not implemented, lack of identified sites.
- Prime shops not now included within the boundary.

Policy 15 Housing Size, Mix and Choice

- 2 contributors- 2 objectors
- Should explicitly include social housing.
- Should not differentiate housing sub-markets.

Policy 18 Shopfronts, signage and security measures

- 1 contributor- objector

- Should be stricter criteria.

Policy 19 Pollution, Hazardous Substances and Ground Conditions

- 1 contributor- objector

- Fracking should be included as a negative development.

Policy 20 Air Quality

- 3 contributors- 3 objectors.

- Town centres should be referenced, especially traffic calming.
- Insufficient evidence and it is dated.
- Electric Vehicles not significant enough in plan period to justify policy.
- Negative impact of road junctions should be referenced.
- Should include tree planting mitigation.
- Development in Bramcote/Stapleford, especially Moor Lane, should be referenced.

Policy 24 The health impacts of development

- 1 contributor- objector.

Policy 26 Travel Plans

- 1 objector.

Policy 27 Local Green Space

- 14 contributors- all objectors.

- Duplicates Broxtowe Core Strategy policy and no evidence.
- Land east and west of Coventry Lane already Green Belt therefore designation unjustified and unnecessary.
- Extent too limited. Reduces existing protections to more limited area.
- Designate land off Cornwall Avenue.

Policy 28 Green Infrastructure Assets

- 3 contributors- 1 supporter and 2 objectors.

- Bramcote Ridge will be lost by developments at Field Farm and east and west of Coventry Lane.

Policy 30 Landscape

- 2 contributors- both objectors.
- River Trent should be added.
- Retain Mature Landscape Area at Kimberley.

Report of the Chair of the Jobs and Economy Committee

WORK PROGRAMME1. Purpose of report

To consider items for inclusion in the Work Programme for future meetings.

2. Background

Items which have already been suggested for inclusion in the Work Programme of future meetings are given below. Members are asked to consider any additional items that they may wish to see in the Programme.

3. Work Programme

<p>16 January 2018</p> <p><u>Please note that this is a Tuesday)</u></p>	<ul style="list-style-type: none"> • Draft Committee Estimates 2018/19 and Draft Business Plans • Occupancy Update of Town Centres and Industrial Units • Business Rates Relief Plan • Wi-Fi Update • Planning Department Staffing Update • Neighbourhood Plan Update • Update on Key Sites • Housing Delivery Workshop • Update on the Survey of Broxtowe Businesses • Grants Report
<p>15 March 2018</p>	<ul style="list-style-type: none"> • Service Delivery Plan 2018/19 • Update on Key Sites • SHLAA Update • HS2 Update • Multi Modal Study

4. Dates of future meetings

Additional meetings will be agreed shortly.
(All meetings to start at 7.00 pm)

Recommendation

The Committee is asked to consider the Work Programme and RESOLVE accordingly.

Background papers

Nil