

Policy 3.2 – Toton (Strategic Location for Growth):

ID	Organisation
Duty to Co-operate / Interest Groups	
4	The Environment Agency
21	Natural England
34	Nottinghamshire Wildlife Trust
48	Sport England
55	Pedals (Nottingham Cycling Campaign)
60	Erewash Borough Council
63	Nottingham City Council
64	Derbyshire County Council
68	Awsorth Parish Council
6537	Awsorth Neighbourhood Plan Steering Group
73	Stapleford Town Council
211	Nottinghamshire County Council
222	Severn Trent
2316	Councillor MacRae
3852	HS2 Ltd
6276	Nottingham West Clinical Commissioning Group
6279	Bramcote Neighbourhood Forum
6577	Chetwynd: The Toton and Chilwell Neighbourhood Forum
6882	Broxtowe Labour Group
6963	East Midlands Councils
Developer / Landowner	
6512	Peveril Homes and UKPP (Toton) (Represented by WYG)
6877	Sahota (Represented by Barton Willmore)
2542	Viitanen (Represented by Featherstones)
4622	Barnes (Represented by Featherstones)
6881	Taylor (Represented by Featherstones)
2652	W.Westerman (Represented by Oxalis Planning Ltd)
2685	Bloor Holmes Ltd (Represented by Oxalis Planning Ltd)
4200	Taylor & Burrows Property (Represented by Phoenix Planning (UK) Limited)
Individual / Local Resident	
623	Trussell
1252	Brown
3855	Hill
6550	Tideswell
6809	Sellers

Details

Agent	
Please provide your client's name	The Environment Agency
Your Details	
Title	
Organisation (If responding on behalf of an organisation)	The Environment Agency
Address	
Telephone Number	
Email Address	
Would you like to be contacted regarding future planning policy consultations?	Yes
If you wish to comment on more than one issue you will need to submit a form for each representation.	

Policy relates to

Please specify what your comment relates to					
Policy number	Page number	Policy text/ Paragraph number	Policies Map	Sustainability Appraisal	Other (e.g. omission, evidence document etc.)
3: Main Built up Area Site Allocations	p76	Policy 3.2			

Question 1: What does your comment relate to? Please specify exactly

Question 2

Question 2: What is the issue with the Local Plan?	
Do you consider this paragraph or policy of the Local Plan to be:	
2.1 Legally compliant	Yes
2.2 Compliant with the duty to co-operate	Yes
2.3 Sound	Yes

Additional details

Please give details of why you consider this part of the Local Plan is not legally compliant, is unsound or does not comply with the duty to co-operate. Alternatively, if you wish to support any of these aspects please provide details.	We are highly supportive of the aspirations the Local Plan has for the HS2 project. In particular, we are pleased to see the requirement for 16 hectares of green space, which would create real opportunities for introducing blue/green infrastructure such as new habitats. We are keen to work with your Authority to identify how the project might connect these new features with existing sites, such as Attenborough Nature Reserve to the South-East. We are clearly supportive of the proposals to identify flood risk solutions given that sections of the site fall within the floodplain. Should residential development come forward in areas of the floodplain, as part of future planning
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	<p>applications, we would expect to see evidence to demonstrate that the flood risk sequential test has been passed. It's worth highlighting that we would also be supportive of 'green' flood risk solutions should these be pursued in conjunction with more traditional forms, for example, using the realignment of flood banks/defences to create new habitat and green infrastructure within the flood storage areas. In summary, we would welcome the opportunity to develop a partnership approach to managing the environmental risks to this site, as well as ensuring that the significant environmental opportunities are recognised and secured where possible.</p>
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Question 4

Question 4: Modifications sought	
Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this modification will make the Local Plan legally compliant or sound.	We consider Policy 3.2 to be legally compliant and sound.

Question 5

Question 5: Public Examination Attendance	
If your representation is seeking a modification, do you consider it necessary to participate at the public examination?	No
If you wish to participate at the public examination, please outline why you consider this to be necessary	

Details

Agent	
Please provide your client's name	
Your Details	
Title	
Name	
Organisation (If responding on behalf of an organisation)	Natural England
Address	
Telephone Number	
Email Address	
Would you like to be contacted regarding future planning policy consultations?	Yes
If you wish to comment on more than one issue you will need to submit a form for each representation.	

Policy relates to

Please specify what your comment relates to					
Policy number	Page number	Policy text/ Paragraph number	Policies Map	Sustainability Appraisal	Other (e.g. omission, evidence document etc.)
3: Main Built up Area Site Allocations		Policy 3.2 Land in the vicinity of the HS2 Station at Toton			

Question 1: What does your comment relate to? Please specify exactly

Question 2

Question 2: What is the issue with the Local Plan?	
Do you consider this paragraph or policy of the Local Plan to be:	
2.1 Legally compliant	Yes
2.2 Compliant with the duty to co-operate	Yes
2.3 Sound	Yes

Additional details

Please give details of why you consider this part of the Local Plan is not legally compliant, is unsound or does not comply with the duty to co-operate. Alternatively, if you wish to support any of these aspects please provide details.	Policy: 3.2 Land in the vicinity of the HS2 Station at Toton (Strategic Location for Growth) Natural England welcomes the aspiration contained within the policy wording and in paragraph 3b.7 which aims to provide Green Infrastructure links between Hobgoblin Wood in the east and Toton Fields Local Wildlife Site in the west and the Erewash Canal corridor. It is essential that this development provides multifunctional greenspace and delivers enhancement of the natural environment for both people and place.
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Question 4

Question 4: Modifications sought	
Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this modification will make the Local Plan legally compliant or sound.	None

Question 5

Question 5: Public Examination Attendance	
If your representation is seeking a modification, do you consider it necessary to participate at the public examination?	No
If you wish to participate at the public examination, please outline why you consider this to be necessary	

Planning Policy
Broxtowe Borough Council
Council Offices
Foster Ave
Beeston
Notts NG9 1AB

3rd November 2017

Dear Sir/ Madam

Comments on Publication Version Part 2 Broxtowe Local Plan

Thank you for the opportunity to comment on the Broxtowe Local Plan Part 2 (publication version).

Whilst recognising the need for housing provision and economic investment in Broxtowe, we have significant concerns about whether the scale of growth proposed during the plan period is necessary or sustainable.

We do not currently have resources to submit each comment on a separate form but to help with your collation of responses our comments are broadly set out by policy number, as requested on the response form (question 1). Where appropriate, we have also indicated if we query the 'soundness' of the plan, as per question 2 and 3. After putting forward our comments we have submitted suggested modifications, as per question 4 of the response form.

Our comments on individual policies are set out below:

Policy 3 Main built up area site allocations

For the reasons provided at 3.1 and 3.2 we generally support the Spatial Strategy approach. We do, however, have substantive concerns about the scale of some of the allocations. We do understand that allocation sites would not necessarily be built up in their entirety and land within the allocation boundary would potentially be set aside for Green Infrastructure (GI) provision and related requirements. However, we think that seeing sites with large red-line boundaries might be potentially confusing and of concern to many of the other consultees - certain local community groups and individuals have contacted us about their concerns about potential loss of greenfield and wildlife sites.

Policy: 3.1 Chetwynd Barracks: 500 homes (within the plan period)

If this site is to be allocated, we very much support the 'key development requirement' to "*Retain and enhance Green Infrastructure corridors around the eastern and northern areas of the site*".

Some parts of the site have developed significant habitat value. These include Hobgoblin Wood and the adjacent Chilwell Ordnance Depot Local Wildlife Site (LWS) which is located outside the redline boundary. Both areas should be protected during construction phase and be retained within GI with their management secured and paid for in perpetuity by the developer. Focusing new built development on the previously developed parts of the site whilst converting and reusing existing buildings, roads and infrastructure wherever possible would allow for a more sustainable form of development to be achieved.



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Modification sought

Include a clear statement confirming that Hobgoblin Wood, other woodland area, mature trees and grasslands will be retained and their long-term management will be secured in perpetuity.

Policy: 3.2 Toton (Strategic Location for Growth): 500 Homes

Toton sidings is at the very centre of the Erewash Valley Living Landscape area, where many partners including Broxtowe Borough Council are investing in extending and improving habitats and GI to achieve Broxtowe Borough Council's Biodiversity and GI targets.

We therefore **object** to this site as a strategic location for growth. Not only would it lead to the loss of a substantial area of Green Belt, resulting in the merging of Chilwell and Stapleford, it would cause a well-defined wildlife corridor between the Erewash Valley and Wollaton Park (via Bramcote Village and Beeston Fields golf course) to be lost. This corridor is identified as primary corridor 1.2 and secondary corridors 2.12 and 2.23 in the Broxtowe Green Infrastructure Strategy and the land between the two secondary corridors will also, in effect, function as a single wide corridor.

We cannot see how transport issues can be addressed in a location already suffering from severe congestion and where other large-scale developments are planned for the current plan period, i.e. 500 homes in connection with the Chetwynd Barracks redevelopment.

We need to point out that part of this land, especially the northern and eastern part of the sidings, are within floodplain and are at high risk of flooding. Therefore, there should be a presumption against development of these parts of the site. Also, if substantive measures are not put in place (e.g. flood storage), development of such a large parcel of land could increase risk of both fluvial and surface water flooding in adjacent areas, especially within Toton and parts of Long Eaton.

Whilst we don't support the principle of development on Green Belt and the scale of the proposed development, we welcome inclusion of open space: *"Minimum of 16ha Open Space, to incorporate Green Infrastructure of sufficient width and quality to provide attractive and usable links between Hobgoblin Wood in the east and Toton Fields Local Wildlife Site in the west and the Erewash Canal, which will blend with a high quality built environment."*

However, we would expect to see the quantity of 'informal' open space (wildlife habitat) specified in the policy wording. In the absence of this, we are concerned that:

- a). the 16ha minimum could be taken up with 'formal' open spaces, such as sports pitches, play areas etc,
- b). the open spaces would be sited in areas subject to high levels of disturbance, such as along paths, road verges etc, which will never develop high wildlife value,
- c). areas of open spaces will be too narrow to usefully function as wildlife habitat (our comments on policy 27 and our recommendation for 50 metre wide buffer are relevant to this).

We are also concerned about the loss of such a large extent of brownfield land in the sidings, which has regenerated to woodland. New open space wildlife sites cannot be recreated easily and will take many years to develop a level of wildlife value equivalent to what will be lost from the sidings, if achievable at all.

Modification sought

Removal of the allocation. If Broxtowe Borough Council is minded to allocate then all LWS habitat should be removed from the allocation, as it might never be possible to recreate habitats of the same value. Clarification that the 16ha minimum will comprise a significant amount of informal open space (wildlife habitat), including a 50m wide habitat corridor.

Policy: 3.3 Bramcote (East of Coventry Lane): 300 Homes

If the entire site is to be developed, this allocation would result in the loss of a LWS – Bramcote Moor Grassland, which we would strongly **object** to.

LWSs are defined areas identified and selected locally for their substantive nature conservation value. Their selection takes into account the most important, distinctive and threatened species and habitats within the county. They therefore comprise many of our best remaining flower-rich meadows, ancient woodlands, ponds, swamps, fens and mires and provide a home to many of our native plant and animal species, including many rare, declining or protected species. These sites 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.

Should the LWS be lost, we would consider the policy unsound as it is not consistent with local (Policy 17 of ACS) and national policy (NPPF para 118).

Modification sought

Inclusion of a sentence stating that the LWS will not be developed or removal of LWS from the allocation boundary. If the LWS would be retained, it would also need to be adequately buffered and work would be required to make the site more robust, as it will be subject to greater footfall post any development. Future management of the LWS should also be secured.

Policy: 3.4 Stapleford (West of Coventry Lane): 240 Homes

The 'key development requirements' include *"provide enhanced Green Infrastructure corridors linking urban areas of Nottingham to the east with Bramcote and Stapleford Hills, Bramcote Park, Boundary Brook, Pit Lane Wildlife Site, Nottingham Canal and Erewash Valley Trail"*.

Whilst we **object** to this allocation because we consider it is encroaching significantly into the surrounding countryside and that local needs have been met by the adjacent Fields Farm site, achievement of a strong corridor is very important. We also agree with the last point of the 'key development requirements', that the cemetery and Stapleford Hills should be adequately buffered, forming a strong and robust habitat corridor linking to Bramcote Moor Grassland LWS.

Modification sought

Removal of allocation. Clarification as to the extent of the corridor, so the site isn't over developed. The adjacent Field Farm Development is mentioned in the location description but we think this policy needs to offer some guidance in terms of how GI linkages will be provided between the two sites.



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Policy: 3.5 Severn Trent (Lilac Grove): 150 Homes

The 'key development requirements' states that the 150 homes will be located towards the north of the site, which appears to be on the former Severn Trent works, and that access will only be from the north (Lilac Grove).

We are hopeful this means the land at the end of Cornwall Avenue will remain undeveloped. It also talks about 'soft landscaping' along the canal and the importance of "Green Infrastructure" corridors. The field at the end of Cornwall Avenue is an important buffer to the Beeston Canal, which itself is a Local Wildlife Site and this should form part of the "Green Infrastructure" and remain undeveloped and long-term management of GI needs to be secured.

Modification sought

Clarification of the extent of GI, confirmation that fields along the Beeston Canal will not be developed and that long-term management of GI will be secured.

Policy: 3.6 Beeston Maltings: 56 Homes

Transport corridors can provide essential wildlife habitat. For instance our sister Wildlife Trust in Yorkshire is promoting a project to maximise their value, which is supported by the Humberhead Levels Nature Improvement Area. Given the apparent lack of buffer on the south of the railway line, we would strongly recommend some form of green link be provided along the southern development boundary.

Modification sought

Provision of green infrastructure link along the railway line under the 'key development requirements'.

Policy: 3.7 Beeston Cement Depot: 21 Homes

Transport corridors can provide essential wildlife habitat. For instance our sister Wildlife Trust in Yorkshire is promoting a project to maximise their value. We would strongly recommend some form of green link be provided along the southern development boundary.

Modification sought

Provision of green infrastructure link along the railway line under the 'key development requirements'.

Policy 4 Awsworth Site Allocation

A substantial population of common toad (Local Biodiversity Action Plan Priority species and NERC Act species of principal importance in England) was known to be present in the vicinity of the allocated site. We are aware that toad tunnels, which we understand have not been maintained, were installed underneath the Awsworth Bypass, to allow toads to migrate between breeding habitat (Nottingham Canal) and fields on the opposite side of the new bypass. Potentially, the fields subject to this allocation still provide terrestrial habitat for common toad, should they still occur. We would recommend surveys for common toad and other wildlife, possible reinstatement of toad tunnels (if required). Due to it's greenfield nature and strong hedgerow network, we think the land could provide habitat for many other species.

Common Toad is considered a biodiversity asset under policy 31, as they are a species of concern in the Notts Biodiversity Action Plan.

Should this species be subject to further adverse impacts, we would consider the policy unsound as it is not consistent with local (Policy 17 of ACS) and national policy (NPPF para 118).

Modification sought

We would wish to see removal of this allocation. If the allocation is to remain, provision of substantial green infrastructure, incorporation of existing hedges and retention of some meadows (quantity defined) and protection of common toads, should they still occur.

Policy 5 Brinsley Site Allocation

We would have preferred to have seen the alternative site included (option 2) rather than this one (option 1) for the reasons provided in our response to the Brinsley Alternative Site Consultation February 2017:

“Option 1 is located immediately adjacent to Brinsley Headstocks Local Nature Reserve and associated Local Wildlife Sites, Brinsley Brook Grassland LWS (5/2302) and Brinsley Headstocks LWS (5/3405), which are identified for their botanical interest. The wildlife value of Brinsley Headstocks, which has been well recorded, may be harmed by any substantial increases in recreational use, which would be inevitable if Option 1 is taken forward.

The LNR and adjacent land is considered locally by members of the Friends Group and others who carry out regular birdwatching locally, as being more valuable for birds. This is certainly likely because the LNR itself supports more structural diversity in its habitats, with areas of woodland, plantation, hedges alongside meadows and the Brinsley Brook. These features are largely lacking from land within Option 2, which is predominantly arable. The LNR currently has good, strong habitat connectivity along the brook and to Saints Coppice to the north, which could be adversely affected by built development if Option 1 is taken forward.

Option 1 contains areas of permanent grassland whereas the majority of land within option 2 is mainly arable, which contains no known botanical interest is less valuable in wildlife terms, apart from hedges which we would like to see sensitively retained within any development”.

Local residents have reported that the fields in the vicinity of the Brinsley allocation included in the current consultation support a number of wintering farmland bird species. We are also concerned about possible hydrological impacts on the Brinsley Brook. As this allocation is within the catchment for the watercourse there is the potential for adverse impacts on the ecology of the brook due to increased runoff rates, contamination (directly or indirectly, via any new drains) etc.

Modification sought

Replace this site allocation with ‘option 2’.

Policy 6 Eastwood Site Allocation

Walker Street Eastwood is an important Green Space in the centre of Eastwood. Whilst we welcome retention of ‘Canyons’ as open space, we would wish to see Green Infrastructure/ habitat corridors enhanced throughout the site.

Modification sought

Include a commitment to provide GI links across the wider site.



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Policy 7.1 Land south of Kimberley Depot

We find proposals to develop the exiting built up part of the site acceptable but are concerned about the impact on wildlife arising from loss of surrounding farmland and plantation woodland. Kimberley Disused Railway, on the southern boundary, is a LWS and important wildlife corridors, which should be adequately buffered from any development.

Modification sought

If this allocation is to remain, we would like to see a statement about extent of developable area, ideally limiting it to the existing built up part of the site. It is important that the allocation is sensitive to, and secures future positive management of the LWS.

Policy 7.2 Land south of Eastwood Road Kimberley

We consider this is an important area of remnant fields on the edge of urban area which, when considered with the adjacent woodland, is an important wildlife corridor. We would be concerned about inclusion of the site as an allocation.

Modification sought

Site to be excluded.

Policy 17 Place-making, Design and Amenity

We **support** the inclusion of 1(n – p):

- “n). Incorporates ecologically sensitive design, with a high standard of planting and features for biodiversity; and*
- o). Uses native species of trees, shrubs and wild-flower seeds in landscaping proposals; and*
- p). Integrates bat and/or bird boxes into the fabric of new buildings”.*

Modification sought

Under n) adding reference to following:

- green walls,
- brown and green roofs,
- ecologically designed / focused suds schemes,
- features to assist permeability for wildlife through the built environment (e.g. gaps under fences for hedgehogs).

Under p) adding a reference to insect houses.

The policy should raise future responsibilities and funding mechanisms for management of habitats / informal open spaces. The developer should cover the costs for management of habitats in perpetuity, so that it does not fall to Broxtowe Borough Council to pay for this.

Policy 19 Pollution, Hazardous Substances and Ground Conditions

Sub section 1b). *“Lighting schemes unless they are designed to use the minimum amount of lighting necessary to achieve their purposes and to minimise any adverse effects beyond the site, including effects on the amenity of local residents, the darkness of the local area and nature conservation (especially bats and invertebrates)”.*

We **support** inclusion of point in relation to darkness and nature conservation.

Policy 27 Local Green Space

We strongly **support** this policy and welcome inclusion of the sites listed. Protection of the sites around Bramcote Hills Park and wood, Stapleford Wood and the Bramcote Schools (section 3 relating to land east and west of Coventry Lane) is welcome, as these are very important wildlife sites with historic / cultural interest.

In terms of policy wording, we are concerned about inclusion of 'exceptional circumstances' clause, as this will undermine the policy protection.

Paragraph 28.2 states, "*The greatest opportunities for enhancing the corridors will come through development, and the Council intends to work with developers to create and maintain new spaces and to improve connectivity. The details of these opportunities for enhancement will depend on the characteristics of the corridors concerned*".

Development certainly creates opportunities for enhancing corridors but we would question whether it creates the 'greatest opportunities'. Many of the corridors are in the rural landscape, not through areas allocated for potential development and significant opportunities exist through working with existing landowners and farmers, in relation to improving existing Rights of Way or strengthening important landscape features and wildlife habitats, such as hedgerows, woodlands and field margins.

Green infrastructure corridors need to be of a reasonable, specified width to be viable; otherwise they will fail to function in ecological terms. Without specified widths there is the danger the corridors will be narrow as developers will naturally seek to maximise the size of the new built development. We have carried out some research on what is considered viable widths of green corridors. In summary:

- "Corridors should be preserved, enhanced and provided, [.....], as they permit certain species to thrive where they otherwise would not. Corridors should be as wide and continuous as possible" (Dawson, 1994).
- 50m buffers [are] recommended for developments in the Local Plans of both Wakefield & Darlington Councils to protect local wildlife sites and / or river corridors.
- A 50m width allows corridors to function as a 'multi-purpose network', as defined in NECR 180, so that it includes attributes that are valuable to people, i.e. biodiversity alongside amenity, footpaths, cycleways, sustainable drainage, microclimate improvement, heritage [etc.]
- Quadrat Scotland 2002 (Appendix 1). For connectedness, to be defined as 'high' (on scale high, medium, low), the corridor needs to be at least 50m wide for more than 50% of the corridor

References

- Dawson, D. 1994. Are Habitat Corridors Conduits for Animals and Plants in a Fragmented Landscape? A Review of the Scientific Evidence. English Nature Research Reports
- Wakefield Consultation on spatial strategy: Wakefield Council Spatial Policy Areas
- Darlington consultation on draft housing allocations: Darlington Council Housing Allocations report
- Natural England Commissioned Report NECR180 (2015). Econets, landscape & people: Integrating people's values and cultural ecosystem services.



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- Quadrat Scotland (2002) The network of wildlife corridors and stepping stones of importance to the biodiversity of East Dunbartonshire. Scottish Natural Heritage Commissioned Report

Modification sought

Removal of “*except in very special circumstances*” from the final sentence of the policy wording.

State that development provides opportunities for enhancing corridors, but remove (development) ‘provides *the greatest*’.

State that corridors must be at least 50 metres wide to be considered beneficial and viable for wildlife.

Policy 28 Green Infrastructure Assets

We strongly **support** this policy and welcome that “*Development proposals which are likely to lead to increased use of any of the Green Infrastructure Assets listed below, as shown on the Policies Map, will be required to take reasonable opportunities to enhance the Green Infrastructure Asset(s)*”.

Policy 29: Cemetery extensions

We **support** this policy and welcome that the potential biodiversity value of new proposed cemeteries has been recognised in the supporting text.

Policy 31: Biodiversity Assets

In terms of defining biodiversity assets, 1b “*Priority habitats and priority species (as identified in the Nottinghamshire Local Biodiversity Action Plan and section 4.5 of the Green Infrastructure Strategy)*”, whilst we welcome inclusion of the reference to Nottinghamshire LBAP, we consider that the definition of biodiversity assets is missing the following:

1. Any reference to UK priority species and habitats (formerly called UK BAP priority species and habitats). Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006 identifies these and they may be found both within or outside designated sites. Priority species correspond to those identified under Section 41 of the NERC Act as species of principal importance for the conservation of biodiversity in England and have to be considered under planning policy.

2. Any reference to protected species. This is different from priority species list (although some priority species may also be protected).

Due to lack of reference to S41 species and habitat NERC Act and Biodiversity Duty, Legally protected species we consider the policy is not sound as it is not consistent with local (Policy 17 of ACS) and national policy (Biodiversity paras).

Modification sought

Inclusion of a reference to NERC Act (species and habitats of principal importance) and legally protected species.

We also consider there is a requirement for a Biodiversity SPD to help protect Broxtowe’s important nature sites, habitat and species and would like to see a commitment to produce one made in the LPP2 main document. A Biodiversity SPD would also help the council to secure its aspirations set out in the Green Infrastructure Strategy and Nature Conservation Strategy.

Policy 32: Developer Contributions

We welcome that financial contributions may be sought for biodiversity for applications of 10 or more houses and therefore **support** the policy in this respect.

In terms of question 5 on the response form (participation at public inquiry), if we have resources available at the time of the hearings, we would be happy to attend public examination sessions. In any case, we are happy to be contacted by the Planning Policy Team regarding future consultations and would welcome email correspondence in connection with this and future consultations.

Please do not hesitate to contact me should you have any further queries.

Yours sincerely

[REDACTED]
Southern Conservation Officer
Nottinghamshire Wildlife Trust



**Nottinghamshire
Wildlife Trust**

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Details

Agent	
Please provide your client's name	
Your Details	
Title	
Name	
Organisation (If responding on behalf of an organisation)	Sport England
Address	
Telephone Number	
Email Address	
Would you like to be contacted regarding future planning policy consultations?	Yes
If you wish to comment on more than one issue you will need to submit a form for each representation.	

Policy relates to

Please specify what your comment relates to					
Policy number	Page number	Policy text/ Paragraph number	Policies Map	Sustainability Appraisal	Other (e.g. omission, evidence document etc.)

Question 1: What does your comment relate to? Please specify exactly

Question 2

Question 2: What is the issue with the Local Plan?	
Do you consider this paragraph or policy of the Local Plan to be:	
2.1 Legally compliant	Yes
2.2 Compliant with the duty to co-operate	Yes
2.3 Sound	No

Question 3

Question 3: Why is the Local Plan unsound? Please only answer this question if you answered 'No' to 2.3 above	
If you think this paragraph or policy of the Plan is not sound, is this because:	
It is not justified	Yes
It is not effective	No
It is not positively prepared	No
It is not consistent with national policy	Yes

Additional details

Please give details of why you consider this part of the Local Plan is not legally compliant, is unsound or does not comply with the duty to co-operate. Alternatively, if you wish to support any of these aspects please provide details.

Consistency with National Policy

Thank you for consulting Sport England on Part 2 of the Local Plan. The Local Plan as proposed is consistent with National Policy due to having a robust and up to date evidence base in regard to its Playing Pitch Strategy and Built Facility Strategy. Please note that it is important to keep these strategies up to date so they can remain robust. However, this is questionable as this evidence base does not appear to be considered and implemented in line with NPPF paragraph 74.

Justification of the Plan - Policy Specific Considerations

In relation to the locations identified in policies 3.1- 3.3, 3.5 & 6.1 for potential major growth, when decisions are made about these locations when they were brought forwards and their potential dwelling capacity. As the plan stands it is currently lacking justification or relevant consideration to whether any of the sites contain existing sports facilities such as playing fields which justify protection under policies 25, 27 and 28 of the plan and paragraph 74 of the NPPF.

Policy 3.1 – Site Allocation of Chetwynd Barracks – There is no mention of playing fields on site within the description. This site Contains 3 x full size football pitches, tennis courts, cricket wickets, bowls provision and a sports hall. The site is highlighted within the Playing Pitch Strategy as a football site. This site currently provides training capacity for Toton Tigers and the Playing Pitch Strategy highlights the need to convert the tennis courts to an Artificial Grass Pitch.

Policy 3.2 – Site Allocation of Toton Lane – The allocation includes a school site and playing pitches within the area. The development is marked for additional land for community facilities including education (the relocation of George Spencer Academy which is Mentioned in the playing pitch strategy as a football and cricket site) and the provision of a Leisure Centre. The proposals also include an allocation for 500homes.

Policy 3.3 - Site Allocation of Bramcote (East of Coventry Lane) – This site is referred to as being greenfield and as a former playing field associated with the adjacent school. The policy states that the site is currently unused. However, the most recent aerial view is from 2013 and shows marked pitches and is listed within the 2016 Playing Pitch Strategy. The site contains 7 x football pitches 3x mini football pitches and 3 cricket wickets. Playing Pitch Strategy states that site is needed and suggests proposals for cricket nets, Artificial Grass Pitch and a sports barn. Playing Pitch Strategy confirms that should the site be lost then equivalent or better provision is required as mitigation. The Site Allocation of Bramcote School and Leisure Centre is also included within this policy for redevelopment. The site includes 3 schools and borders existing playing fields the site contains a small sided Artificial Grass Pitch which is currently used by football, multiple courts and a sports hall which is also used by a local football club. Therefore, it will need to be insured that any development does not prejudice the use of these facilities.

Policy 3.5 - Site Allocation of Severn Trent – This site borders playing pitches therefore any development needs to ensure that there are no negative impacts to these pitches. The Playing Pitch Strategy also refers to the Nottingham casuals site which is stated as being overplayed and needing investment of £340,000 for changing room improvements and floodlighting.

Policy 6.1 – Walker street Eastwood – There is no mention of playing fields on site within the description. However, Google image from 2016 shows a cricket wicket and Google history shows site with 3 football pitches and a rounders pitch. This site does not appear to be covered by the Playing Pitch Strategy where there is a shown deficiency and no justification for pitches to be lost. The pitches should be protected from development.

Map 3 - this map includes the site allocation of Trent Vale sports club within the mixed-use commitments however the plan gives no further information on this allocation. 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.

Where these sites contain pitches and the evidence base highlights a deficiency in provision there is a conflict within the policies. Therefore, the extent of development in these locations should account for the need to maintain such facilities and site policies

	<p>should require the facilities to be protected or replaced. The loss of the playing fields without an agreed compensatory project being implemented would not accord with Sport England's playing fields policy or paragraph 74 of the NPPF.</p> <p>Policies 17 & 24 - Sport England 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 through sport and physical activity (through use of Sport England's and Public Health England's established Active Design guidance (http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design/))</p> <p>Policy 25 – Sport England seeks to ensure that a planned approach to the provision of facilities and opportunities for sport and recreation is taken by planning authorities. We 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.</p> <p>Policy 27 - Sport England is encouraged that the emerging local plan looks to include policies to protect existing sport/leisure facilities where there is a need to do so to meet existing/future community needs which accord with paragraph 74 of the NPPF - policies that support the principle of enhancing existing sports/leisure facilities to meet community needs. 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</p> <p>Policy 28 – Sport England 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.</p> <p>If you would like any further information or advice please contact me.</p>
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Question 4

Question 4: Modifications sought	
Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this modification will make the Local Plan legally compliant or sound.	.

Question 5

Question 5: Public Examination Attendance	
If your representation is seeking a modification, do you consider it necessary to participate at the public examination?	No
If you wish to participate at the public examination, please outline why you consider this to be necessary	

Broxtowe Part 2 Local Plan



Broxtowe
Borough
COUNCIL

Agent

Please provide your client's name	n/a
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Your Details

Title	Mr	Mrs	Miss	Ms	Other:
Name	[REDACTED]				
Organisation (if responding on behalf of the organisation)	On behalf of Pedals (Nottingham Cycling Campaign)				
Address	[REDACTED]				
Postcode	[REDACTED]				
Tel. Number	[REDACTED]				
E-mail address	[REDACTED]				

Comments should be received by 5.00pm on Friday 3rd November 2017

If you wish to comment on several policies, paragraphs, or sites, please use a separate form for each representation.

If you would like to be contacted by the Planning Policy Team regarding future consultations. **Please tick here** ☐

Please help us save money and the environment by providing an e-mail address that correspondence can be sent to: _____

For more information including an **online response** form please visit:

www.broxtowe.gov.uk/part2localplan

Data Protection - The comment(s) you submit on the Local Development Framework (LDF) will be used in the plan process and may be in use for the lifetime of the LDF in accordance with the Data Protection Act 1998. The information will be analysed and the Council will consider issues raised.

Please return completed forms to:

Planning Policy, Legal and Planning Services, Foster Avenue, Beeston, Nottingham NG9 1AB

For more information: Tel: 0115 917 3452, 3448, 3468 or 3015 E-mail: policy@broxtowe.gov.uk

Question 1: What does your comment relate to? Please specify exactly

Document	Policy number	Page number	Policy text/ Paragraph number
Part 2 Local Plan	Policy 1: Flood Risk		
	Policy 2: Site Allocations		
	Policy 3: Main Built up Area Site Allocations	P28-	
	Policy 4: Awsworth Site Allocation		
	Policy 5: Brinsley Site Allocation		
	Policy 6: Eastwood Site Allocation		
	Policy 7: Kimberley Site Allocations		
	Policy 8: Development in the Green Belt		
	Policy 9: Retention of good quality existing employment sites		
	Policy 10: Town Centre and District Centre Uses		
	Policy 11: The Square, Beeston		
	Policy 12: Edge-of-Centre A1 Retail in Eastwood		
	Policy 13: Proposals for main town centre uses in edge-of-centre and out-of-centre locations		
	Policy 14: Centre of Neighbourhood Importance (Chilwell Road / High Road)		
	Policy 15: Housing size, mix and choice		
	Policy 16: Gypsies and Travellers		
	Policy 17: Place-making, design and amenity		
	Policy 18: Shopfronts, signage and security measures		
	Policy 19: Pollution, Hazardous Substances and Ground Conditions		
	Policy 20: Air Quality		
	Policy 21: Unstable land		
	Policy 22: Minerals		
	Policy 23: Proposals affecting designated and nondesignated heritage assets		
	Policy 24: The health impacts of development		
	Policy 25: Culture, Tourism and Sport		
	Policy 26: Travel Plans		
	Policy 27: Local Green Space		
	Policy 28: Green Infrastructure Assets		
	Policy 29: Cemetery Extensions		
	Policy 30: Landscape		
	Policy 31: Biodiversity Assets		
	Policy 32: Developer Contributions		

Policies Map			
Sustainability Appraisal			
Other (e.g. omission, evidence document etc.)			

Question 2: What is the issue with the Local Plan?

Do you consider this paragraph or policy of the Local Plan to be: <i>(please refer to the guidance note at for an explanation of these terms)</i>		Yes	No
2.1	Legally compliant	y	
2.2	Compliant with the duty to co-operate	y	
2.3	Sound		n

Question 3: Why is the Local Plan unsound? Please **only** answer this question if you answered 'No' to 2.3 above

If you think this paragraph or policy of the Plan is not sound, is this because:	
It is not justified	n
It is not effective	
It is not positively prepared	n
It is not consistent with national policy	n

Your comments

Please give details of why you consider this part of the Local Plan is not legally compliant, is unsound or does not comply with the duty to co-operate. Alternatively, if you wish to support any of these aspects please provide details. Please be as precise as possible. Continue on an extra sheet if necessary.

Not all sections in this make clear the need for good cycle as well as pedestrian links, although some are very supportive, such as Policy: 3.1 Chetwynd Barracks and Policy: 3.2 Land in the vicinity of the HS2 Station at Toton, which we very much welcome and support, especially the many aspirations for Policy 3.2 including good routes to and from Stapleford and Long Eaton, and the Erewash Trail, as well as the existing main urban areas in Beeston and Chilwell etc. with their substantial existing cycle network.

We also welcome the inclusive of cycle access as a key development requirement for Policy: 3.7 Cement Depot Beeston, in view of the fact that this is of direct relevance to improving a substandard stretch of Sustrans National Cycle Network Route 6, as well as being of particular importance to improving cycle access to and from Beeston Station.

National policy is to support cycling as well as walking and this is very much indicated in the new DfT system of Local Cycling and Walking Infrastructure Plans, and its technical guidance, launched in 2017.

The ones where a specific need for good cycle as well as pedestrian access should be mentioned specifically include:-

Policy: 3.3 Bramcote (East of Coventry Lane)

Policy: 3.5 Severn Trent, Beeston, which includes a proposal for a new pedestrian bridge over the canal

Question 4: Modifications sought

Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. Continue on an extra sheet if necessary.

National policy is to support cycling as well as walking and this is very much indicated in the new DfT system of Local Cycling and Walking Infrastructure Plans, and its technical guidance, launched in 2017.

We therefore think that there is a need for good cycle as well as pedestrian access to be mentioned specifically include:-

Policy: 3.3 Bramcote (East of Coventry Lane)

Policy: 3.5 Severn Trent, Beeston, which includes a proposal for a new pedestrian bridge over the canal

This would also help to connect to existing cycle routes and generally to increase the extent of the Greater Nottingham Cycle Network, for both leisure and utility (commuting etc) purposes.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. **After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

Question 5: Public Examination Attendance

If your representation is seeking a modification, do you consider it necessary to participate at the public examination?

Yes, I wish to participate at the public examination

No, I do not wish to participate at the public examination

/

If you wish to participate at the public examination, please outline why you consider this to be necessary

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the public examination.

Guidance Note:

Please complete a **separate form** for **each representation** you wish to make.

'Legally Compliant':

If your response relates to **the way in which the plan has been prepared**, then this is likely to relate to whether it or not it is '**Legally Compliant**'. To be 'Legally Compliant', the Local Plan has to be prepared in accordance within the 'Duty to Cooperate' and legal and procedural requirements. These are set out by legislation in the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). If you think that we have not met the legal requirement in the preparation of the Local Plan, please use the response form to tell us what we have not done or what we have done incorrectly.

'Compliant with the Duty to Co-operate':

If your response relates to **the way in which we have worked with other authorities** then this is likely to relate to the '**Duty to Co-operate**'.

The 'Duty to Co-operate' places a legal duty on Local Planning Authorities, County Councils and certain public bodies to engage constructively, actively, and on an on-going basis, to maximise the effectiveness of Local Plan preparation in the context of strategic cross-boundary matters. The 'Duty to Co-operate' is not a duty to agree. However, Local Planning Authorities should make every effort to secure the necessary co-operation on strategic cross-boundary matters before they submit their Local Plan for examination.

'Sound'

If your response is about the **content** of the Local Plan and the strategy it adopts, then it is likely to relate to whether or not the Local Plan is '**Sound**'.

To meet the 'Test of Soundness', the independent Planning Inspector is required to consider whether or not our Local Plan is '**justified**', '**effective**', has been '**positively prepared**', and is '**consistent with national policy**'. You may wish to consider the following before making a representation on the 'Soundness' of our Local Plan:

- '**Justified**': This means that the Local Plan is based upon a robust and credible evidence base. If you think that the evidence doesn't support the choice made in our Local Plan, or there are realistic alternatives, then your comments may relate to whether or not it is 'justified'.
- '**Effective**': This means that the Local Plan will deliver what it sets out to. If you think that what we are proposing in the Local Plan is not deliverable, then your comments may relate to whether or not our Local Plan is 'effective'.
- '**Positively Prepared**': This means the Local Plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.
- '**Consistent with National Policy**': Do you consider that our Local Plan accords with the National Planning Policy Framework (NPPF) and other policies, or includes clear and convincing reasons for doing something different?

For further guidance or assistance, please contact the **Planning Policy Team** on **0115 917 3452** or by emailing **policy@broxtowe.gov.uk**.

Resources, Planning and Regeneration

Town Hall, Long Eaton
Derbyshire, NG10 1HU

[REDACTED]
[REDACTED]
Tel: [REDACTED]
Fax: -
Your Ref: -
Our Ref: EBC/AR/PP/007

3 November 2017

Dear Steffan,

RE: BROXTOWE PART 2 LOCAL PLAN – PUBLICATION VERSION

Thank you for notifying us of the formal stage of consultation concerning Broxtowe Borough Council's Local Plan Part 2 Publication document.

I wish to state Erewash Borough Council's general support over the manner in which your Council plans to meet its long-term housing requirements (set out within your adopted Aligned Core Strategy) through the Plan's draft policies and proposed allocations.

Broxtowe and Erewash councils have worked effectively over recent years as part of the wider Nottingham Core Housing Market Area to ensure common spatial interests are positively addressed and planned for through our respective planning documents. This response continues this constructive relationship, with Erewash Borough Council of the view that the draft document is both sound and legally compliant.

Draft Policy 3.2 of the Plan is of particular interest to Erewash Borough Council and we wish to support the scale of ambition set out by your Council for the future development of the allocation site. In particular, we welcome references to it contributing to access enhancements to Long Eaton as part of an integrated local transport system which would include an effective traffic system to manage the flow of traffic around the station.

It is also noted that the Plan requires a tram extension to terminate at a level which facilitates the future tram extension beyond the HS2 station. We would wish to point out that any additions to the network beyond the station would almost immediately enter into Erewash Borough and as such, would be subject to the land-use policies in the Local Planning Authority's Local Plan.

Erewash notes the longer-term aspirations referred to by the Plan at **3b.6** under the heading '**Traffic, Transport & Connectivity**' to extend the tram network as far as East Midlands Airport and Derby; proposals which are featured within the recently-published East Midlands HS2 Growth Strategy. Erewash Borough Council also notes that there are as yet no agreed

routes through Erewash Borough to either of these destinations, and that the economic viability of such route extensions has not yet been established.

I trust the comments above are helpful, but please do not hesitate to get back in touch should you wish to discuss anything in further detail.

Yours sincerely

A large black rectangular redaction box covering the signature area.


Senior Planning Policy Officer

63

From: Peter McAnespie <[REDACTED]>
Sent: 31 October 2017 09:59
To: Policy
Cc: [REDACTED]
Subject: FW: Broxtowe Local Plan consultation

Dear Sir/Madam

In addition to Matt Gregory's comments already sent through, please see below further Nottingham City Council officer comments in response to the Publication Local Plan consultation.

Regards

Peter McAnespie

From: Steve Tough –NET Project Officer
Sent: 27 October 2017 16:28
To: Mark Flander [REDACTED]
Cc: Chris Carter <[REDACTED]>
Subject: Broxtowe Local Plan consultation

Section 3b.15 states that 'Area 3 would be the eastern part of the high plateau to the east of Toton/ Stapleford Lane and could comprise a Leisure / education hub, with the potential of relocating Park and Ride. Whether the Park and Ride remains in the current location or not, there remains space to incorporate a Leisure and education hub to the south of this whilst maintaining sufficient space to link the Chetwynd development with this development area. It will be a decision for Broxtowe to take.'

The City Council is the promoter of Nottingham Express Transit, and the Chilwell via Beeston route terminates at the Toton Lane Park and Ride site. The 1400 space park and ride site has been very successful since it opened in August 2015, with high levels of occupancy from the outset, and significant subsequent growth subsequently making it one of the busiest sites in Nottingham. A key factor for its success has been its optimal strategic location, a short distance and easy access from the M1 and A52, and the local settlements of Long Eaton, Toton, Stapleford and Sandiacre. The Park and Ride is one of the most important sites on the system and is a fundamental part of the success of the system, and, whilst further park and ride capacity should be considered as part of any future NET extensions associated with Phase Two, the Council would not support the relocation or reduction in capacity of this site, or changes to its access from the strategic and local road network.

The Kimberley depot site (Policy 7.1) allocation is identified for residential development, and affects two route options for potential tram extensions from Phoenix Park to Kimberley. Opun are working with Broxtowe in providing design support for this site, and they noted in their workshop of 10th October 2016 that the site 'should also be designed to allow for the potential new route of the Nottingham tram (NET) to serve this area.' The City Council supports this view and believes that this should be incorporated into the key development requirements on this site.

This email is security checked and subject to the disclaimer on web-page:

<http://www.nottinghamcity.gov.uk/privacy-statement> This message has been scanned by Exchange Online Protection.

Planning Policy
Broxtowe Borough Council
Town Hall
Foster Avenue
BEESTON
Nottinghamshire
NG9 1AB

Date: 3 November 2017

Dear Madam/Sir

Localism Act 2011 – Strategic Planning Comments

Broxtowe Borough Council Local Plan Part 2: Publication Version

Thank you for consulting Derbyshire County Council (DCC) on the Broxtowe Borough Council Local Plan Part 2: Publication Version (BBCLP2). Please find below Officers' technical comments for your consideration:

Officer Comments

Housing

There are two key strategic housing allocations identified in the BBCLP2, which raise potential cross-boundary strategic planning policy implications for Derbyshire, and on which DCC has previously provided strategic planning policy comments. The two sites are identified in Policy 3.1: Chetwynd Barracks and Policy 3.2: Land in the vicinity of HS2 Station at Toton (Strategic Location for Growth).

Policy 3.1: Chetwynd Barracks

On 5 October 2016, DCC provided Officer technical comments to Broxtowe Borough Council on a proposed additional site consultation for the Local Plan Part 2 comprising the site at Chetwynd Barracks. DCC's comments considered that the site was located in a very sustainable location within the urban area between Toton and Chilwell and would be well located to take advantage of the recent opening of the Nottingham Express Transit (NET) extension and the proposed High Speed Two (HS2) station at Toton, both of which are a short distance away to the north-west. Although comprising a housing development of 800 dwellings, the comments considered that the proposed allocation would be unlikely to have any significant implications for housing delivery in nearby

Erewash Borough, particularly the strategic housing allocation at Stanton. The comments above remain relevant to the allocation and are reaffirmed.

Since DCC submitted the comments above, the County Council has been party to a joint submission in association with Nottinghamshire County Council, Nottingham City Council, Derby City Council, Erewash Borough Council, Broxtowe Borough Council and Chesterfield Borough Council to the Government's Housing Infrastructure Fund (HIF) – Forward Funding Scheme for the HS2 East Midlands Network of Garden Villages. The Forward Funding bid includes the identification of a range of large-scale housing development proposals in Derbyshire and Nottinghamshire, whose delivery could be facilitated through the HIF and includes the site at Chetwynd Barracks, which is identified as having potential capacity for up to 1,600 dwellings in total between 2021 and 2036 onwards. In the context of the above, the proposed allocation of the Chetwynd Barracks site for 500 dwellings (within the Plan period) is supported as a key element of a HIF bid to maximise the delivery of housing growth associated with the development of HS2.

Policy 3.2: Land in the vicinity of HS2 Station at Toton (Strategic Location for Growth)

On 24 November 2015, DCC submitted Officer technical comments on a consultation by Broxtowe Borough Council on a masterplan for the Toton Strategic Location for Growth. The comments considered that the broad area of the site would form a logical sustainable urban extension to the existing large area of residential development in Toton to the south of the allocation and west and north-east of the B6003 Stapleford Lane. The scale of housing and employment land identified was supported as the most appropriate scale and mix of development for the site. Because much of the area of land included in the allocation is Green Belt land, the comments indicated that it was an important consideration in the design of the scheme that significant areas of landscaping and open space were incorporated to ensure that the separation of the urban areas of Toton, Stapleford, Long Eaton and Chilwell was maintained. It is welcomed and supported, therefore, that Policy 3.2 indicates that 16 ha of land in the allocation will be dedicated for open space, to incorporate Green Infrastructure of sufficient width and quality to provide attractive and usable links between Hobgoblin Wood in the east and Toton Fields Local Wildlife Site in the west and the Erewash Canal, which will blend with a high quality built environment.

In terms of connectivity, it is welcomed and supported that Policy 3.2 sets out key requirements for the development of the site that would facilitate good connectivity of the site with the wider surrounding area, including within Derbyshire and particularly Erewash Borough through the provision of:

An integrated local transport system that facilitates access enhancements to the station from the two gateway towns of Long Eaton to the south (in Erewash Borough) and Stapleford to the north; and

An integrated traffic system that flows well including proper consideration of access both from Long Eaton and Stapleford.

It is noted that Policy 3.2 includes a requirement that additional land for community facilities will be included in the allocation, including land for a new primary school. In its comments on the masterplan consultation referred to above, DCC's Officer comments considered that the allocation of the site for 500 dwellings and the provision of a new primary school could raise cross-boundary education issues for DCC, not least because the site lies in close proximity to the Derbyshire Local Education Authority Normal Areas of a number of schools at primary and secondary level. The comments supported the need for a new school on the site and recommended that an assessment of the potential impact of the development area on Derbyshire schools should be undertaken as part of the development proposals and that the potential for pupils from Derbyshire wishing to attend the new primary school (and extended secondary school within Broxtowe) should also be assessed. These comments remain relevant to Policy 3.2 and are reaffirmed. DCC would welcome the opportunity to engage in on-going discussions with Broxtowe Borough Council on this matter as proposals for the new primary school on the site are progressed.

Since DCC submitted the comments above, the County Council has been party to a joint submission in association with Nottinghamshire County Council, Nottingham City Council, Derby City Council, Erewash Borough Council, Broxtowe Borough Council and Chesterfield Borough Council to the Government's Housing Infrastructure Fund – Forward Funding Scheme for the HS2 East Midlands Network of Garden Villages. The Forward Funding bid includes the identification of a range of large-scale housing development proposals in Derbyshire and Nottinghamshire, whose delivery could be facilitated through the HIF and includes the Toton Strategic Location for Growth that is identified as having potential capacity for up to 3,700 dwellings in total between 2021 and 2036 onwards. In the context of the above, the proposed allocation of the Toton Strategic Location for Growth for 500 dwellings (within the Plan period) is supported as a key element of a HIF bid to maximise the delivery of housing growth associated with the development of HS2.

Highways

There are a significant quanta of developments, including existing commitments, as indicated on Map 5: Housing and Mixed Use allocations in Chilwell, Toton and Stapleford, that could potentially have significant impacts upon roads in Derbyshire.

The local Highway Authorities, Derbyshire County Council, Nottinghamshire County Council, Derby City Council, and Nottingham City Council, together with Highways England, have expended considerable effort in deciding and agreeing a way forward in the scoping of the Transportation Assessment required to support the inclusion of a new HS2 East Midlands Hub station at Toton, as confirmed by the Government in November 2016, together with the necessary traffic modelling required to underpin it. In view of the quantum of

development under consideration, early engagement with the East Midlands Gateway Modelling Group would be advisable.

I trust that you will be able to take the above comments into account prior to submission to the Secretary of State for examination. If you have any questions, or anything is unclear, please contact me.

Yours faithfully



Policy and Monitoring and LA lead: CLIP: Planning Sub-group

Details

Agent	
Please provide your client's name	
Your Details	
Title	
Name	
Organisation (If responding on behalf of an organisation)	Awsorth Parish Council
Address	
Telephone Number	
Email Address	
Would you like to be contacted regarding future planning policy consultations?	Yes
If you wish to comment on more than one issue you will need to submit a form for each representation.	

Policy relates to

Please specify what your comment relates to					
Policy number	Page number	Policy text/ Paragraph number	Policies Map	Sustainability Appraisal	Other (e.g. omission, evidence document etc.)
	80	Traffic / Transport / Connectivity			

Question 1: What does your comment relate to? Please specify exactly

Question 2

Question 2: What is the issue with the Local Plan?	
Do you consider this paragraph or policy of the Local Plan to be:	
2.1 Legally compliant	Yes
2.2 Compliant with the duty to co-operate	Yes
2.3 Sound	No

Question 3

Question 3: Why is the Local Plan unsound? Please only answer this question if you answered 'No' to 2.3 above	
If you think this paragraph or policy of the Plan is not sound, is this because:	
It is not justified	Yes
It is not effective	Yes
It is not positively prepared	No
It is not consistent with national policy	No

Additional details

<p>Please give details of why you consider this part of the Local Plan is not legally compliant, is unsound or does not comply with the duty to co-operate. Alternatively, if you wish to support any of these aspects please provide details.</p>	<p>Page 80 – Although Map 31 includes a symbol no reference is made in accompanying text to the new Ilkeston Station which is an important omission in the context of the Awsworth Key Settlement being required to provide land for up to 350 new homes.</p>
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Question 4

Question 4: Modifications sought	
<p>Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this modification will make the Local Plan legally compliant or sound.</p>	<p>Include appropriate reference to new Ilkeston Station.</p>

Question 5

Question 5: Public Examination Attendance	
<p>If your representation is seeking a modification, do you consider it necessary to participate at the public examination?</p>	<p>No</p>
<p>If you wish to participate at the public examination, please outline why you consider this to be necessary</p>	

Details

Agent	
Please provide your client's name	
Your Details	
Title	
Name	
Organisation (If responding on behalf of an organisation)	Awsworth Neighbourhood Plan Steering Group
Address	
Telephone Number	
Email Address	
Would you like to be contacted regarding future planning policy consultations?	Yes
If you wish to comment on more than one issue you will need to submit a form for each representation.	

Policy relates to

Please specify what your comment relates to					
Policy number	Page number	Policy text/ Paragraph number	Policies Map	Sustainability Appraisal	Other (e.g. omission, evidence document etc.)
	80	Traffic / Transport / Connectivity			

Question 1: What does your comment relate to? Please specify exactly

Question 2

Question 2: What is the issue with the Local Plan?	
Do you consider this paragraph or policy of the Local Plan to be:	
2.1 Legally compliant	Yes
2.2 Compliant with the duty to co-operate	Yes
2.3 Sound	No

Question 3

Question 3: Why is the Local Plan unsound? Please only answer this question if you answered 'No' to 2.3 above	
If you think this paragraph or policy of the Plan is not sound, is this because:	
It is not justified	Yes
It is not effective	Yes
It is not positively prepared	No
It is not consistent with national policy	No

Additional details

<p>Please give details of why you consider this part of the Local Plan is not legally compliant, is unsound or does not comply with the duty to co-operate. Alternatively, if you wish to support any of these aspects please provide details.</p>	<p>Page 80 – Although Map 31 includes a symbol no reference is made in accompanying text to the new Ilkeston Station which is an important omission in the context of the Awsworth Key Settlement being required to provide land for up to 350 new homes.</p>
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Question 4

Question 4: Modifications sought	
<p>Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this modification will make the Local Plan legally compliant or sound.</p>	<p>Include appropriate reference to new Ilkeston Station.</p>

Question 5

Question 5: Public Examination Attendance	
<p>If your representation is seeking a modification, do you consider it necessary to participate at the public examination?</p>	<p>No</p>
<p>If you wish to participate at the public examination, please outline why you consider this to be necessary</p>	



Stapleford Town Council



Mr S Saunders
Planning Policy
Broxtowe Borough Council
Foster Ave.
Beeston
NG9 1AB

2nd November 2017

Dear Mr. Saunders,

Broxtowe Local Plan Part 2

Please find attached the comments regarding the Broxtowe Local Plan Part 2, as discussed by Stapleford Town Council at its Meeting held on 13th October 2017.

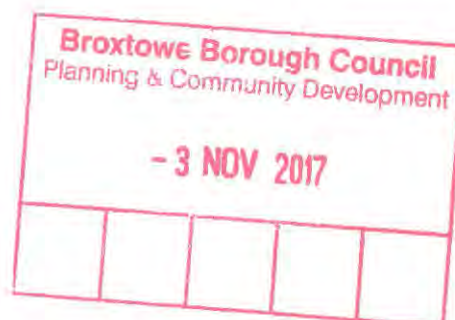
There was full and frank discussion of this document and I have set out a full minute reference as instructed by the Town Council and this is the formal comment of the Town Council on this matter.

Further, I have been instructed to inform you that Stapleford Town Council would wish to be invited to the Public Examination of the Broxtowe Local Plan Part 2 and would reserve the right to speak to its comments.

I am also forwarding these comments by email.

Yours sincerely

Town Clerk
Stapleford Town Council



Minute Reference Stapleford Town Council Meeting held on 23rd October 2017

83/2018 Update: Broxtowe Borough Council Local Plan

Member's considered the proposals made in the Broxtowe Borough Council Local Plan Part 2 consultation documents and following full and frank discussion the following points were noted for forwarding to Broxtowe Borough Council as the Town Council's formal comments on this Document.

1. Councillor Pearson was disquieted by a number of statements contained within the Broxtowe Borough Council Local Plan Part II and considered a number of the statements made to be erroneous and lacking in evidence and the Meeting concurred with his comments.
2. Attention was drawn to comments made on page 12 of the document re 'Employment where it was stated that 'Broxtowe was a thriving and vibrant place with access to services jobs and opportunities for all.' The Meeting saw no evidence for this statement. Likewise, the comments relating to 'Community Safety' where Members were concerned there was no evidence to justify this statement or proposals of how the aspirations would be achieved.
3. On page 14 of the document where land in vicinity of HS2 was recognised the Meeting felt that there was a need for further information on proposals for this expansion in the Main Built Up Area. Not enough attention was being paid to the opportunities that would arise with the development of HS2 and associated projects.
4. Page 15 of the document continued to address the Spatial Objective and point v) discussed residential redevelopment of two areas within Beeston and then mentioned that 'Growth is also provided for at Eastwood and Stapleford...' However, at no point does it explain where this 'Growth' will be accommodated or how these aspirations will be achieved.
5. Further there seems to be a lack of clarity as to what is meant by 'regeneration' in point v) (see above) and while residential development was mentioned there was a paucity of detail regarding the provision of designated land for employment purposes, which would be an essential part of any regeneration strategy.
6. With regard to 'Health and well-being', page 16 point viii) this was an area that concerned the Town Council as there appeared to be an absence of proposals to achieve the improved health and well-being of the Town's residents or make any positive suggestions for the development of new community facilities within the Town.

7. Again, on Page 16, point x) the Meeting was amazed by the comment 'Excellent transport systems. It was felt that residents living within Beeston may enjoy 'excellent transport systems' but the residents of Stapleford, were disadvantaged in this area of provision. The lack of a bus service from the North of the Town or Town Centre area to Beeston in the evening and the reduction of the 18 bus service, to one bus an hour only, and confined to the day only, the last bus from Stapleford being at 6.49p.m. This severely disadvantaged employment and/or educational prospects for residents without access to a car.
8. While the tram served the area of the Town adjacent to the tram stop and George Spencer Academy, it was not accessible to residents without access to a car. There was perceived need for transport linking the tram stop with the rest of Stapleford running during the day, evenings and at weekends.
9. The Town Council did not support development on designated green belt land and was most distressed by the amount of land that Broxtowe Borough Council had identified for potential removal from the precious green belt area, which separated the Town from surrounding villages and suburbs. Members were not in favour of the coalescence of the Town into the Greater Built Up Area.
10. Proposals regarding development on both sides of Coventry lane were not supported by the Town Council. Both these sites to the East(Bramcote), and West(Stapleford), off Coventry Lane, were important green belt areas, separating the Town from nearby Bramcote and Wollaton and vice versa, being an integral part of the important green corridor between the Borough and the City.
11. Further both sites were isolated from the main infrastructure of the Town. There was no public transport serving either site which would necessitate individuals moving to such a development to have access to a car. Particularly as there was an absence of infrastructure in this area, with no nearby schools, shops, health centres, community or leisure facilities. The parcels of land suggested for development were not large enough to support communities that would encourage the expansion of such services in this area and indeed there was no allocation of land for such purposes within the proposals. Thus, Members were concerned that such households would merely live within such a development and find their needs re: employment, shopping, leisure etc met elsewhere and thus they would contribute little to the economy of the local area. This would mean that not only would precious green belt be lost to the Town and neighbouring areas, potential new residents would be contributing little to the supposed regeneration of Stapleford, as referred to within the main document, as it was considered unlikely they would be utilising the facilities in the Town Centre. Further the access and egress to Stapleford and Bramcote via Coventry Lane was already highly congested at peak times and further development in this area would add to the traffic bottle necks already experienced by road users.

12. Moving on to pages 76, 77 and 78 of the Local Plan Part 2 and the discussion re the proposed HS2 Project, concern was expressed that the proposals within these pages was different from proposals expressed by D2N2 for the same area. Should the development plan as envisaged within the Local Plan Part 2 be taken to fruition the proposals for the area, contained within D2N2 document, to re-site George Spencer Academy and build a Leisure Centre adjacent to the Tram Stop, together with new road ways and junctions would suggest that the new build as envisaged within the Local Plan Part 2 could result in partial/selective demolition of the new build residential development.
13. Members considered it would be more sensible for this part of the Local Plan Part 2 to be re-written following full consultation with D2N2, the Town Council and other interested parties. This project was considered too important, by Councillors, to be left to chance and it was considered essential that all interested parties should be involved in the discussion regarding the best way to develop this site, to gain the most in terms of regeneration for the surrounding areas while ensuring the proposed development enhances the environment.
14. Policy 9, page 88 refers to the Retention of Good Quality Existing Employment Sites. While the Meeting recognised the aspiration contained within this Policy it was concerned that there was no clear indication of how these aspirations would be met. Further there was no clear indication of how this employment would be sustained and it was noted that the Bessell Lane/Palmer Drive area was subject to issues related to the HS2 Project. It was felt that a map indicating these key employment areas, together with other areas currently utilised as employment sites would have been useful when considering this consultation document.
15. On Page 100 the District Centre for Stapleford was considered and the Meeting expressed its concern regarding the proposals set out in this Strategic Policy. Members did not wish to see the area of the Town Centre area contracted. There were currently a number of attractive shops and thriving businesses in the area from Bessel Lane to Halls Road and to contract the Town Centre Area would do these businesses a dis-service. Further with the proposed HS2 Project there will be scope for development and growth in this area of the Town. There was a noticeable decline in shops/businesses within this proposed contracted area. This begs the question that by contracting this area, how would such action improve the district centre for business expansion.
16. Policy 15 on page 106 discussed Housing Size and mix and here great concern was expressed. Firstly, the lack of a clear identification of the number of units of new housing development that the Town was expected to accommodate within its designation as part of the main built up area created difficulties when commenting on housing allocation. (This issue had been identified by the Neighbourhood Plan Steering Group).

17. Within Policy 15 an allocation of only 10% affordable housing units had been identified, with no justification for this figure. Members accepted that there was a need for housing to be accommodated within the Town and it was further recognised that there was a substantial need for affordable housing to meet the needs of current and future generations of residents of the Town. It was the opinion of the Meeting that Broxtowe Borough Council needed to justify this low proportion of affordable housing being suggested for the Town. Stapleford contains two of the most deprived wards within Broxtowe Borough, (Stapleford North and Stapleford South West), and surely this indicates a need for a higher proportion of affordable housing than the 10% identified within the Local Plan Part 2. This begs the question that does this proposal serve the needs of local residents?
18. Regarding Policy 20: Air Quality - the Meeting was surprised that no particular mention was made regarding Stapleford which also suffers from poor air quality. The congestion on the main roads in and out of the Town, the road humps on Derby Road, issues that have been raised re certain employment sites and emissions, all make the need to monitor and act effectively to improve the air quality in the Town imperative and in line with current Government initiatives.
19. Members considered that the proposals affecting designated and non-designated heritage sites, Policy 23, did not emphasise sufficiently the Heritage Assets contained within Stapleford. No mention was made of former Police Station, Carnegie Centre, the Old Cross Public House, former Whiteley Mill, Stapleford Cemetery and Bob's Rock.
20. The Meeting was not satisfied with this Local Plan Part2 Members felt that it had to a great extent ignored Stapleford and offered little in the way of positive prospects for the Town's regeneration while making sweeping statements that showed little justification in the printed document.
21. There was no evidence of sustainability or of how aspirations that were listed within the policies could be achieved for Stapleford. It was agreed that there was a need for Section 106 gains to be spent in the Town for the good of the residents and that full consultation should be held when such monies were available for distribution. It was noted that that Members were unaware of how Section 106 monies achieved from the Field Farm Development would benefit the Town and that this was unacceptable.
22. Members also wished to see sensible allocations of affordable housing in the Town and that when Developers were building in the Town and were obliged to provide affordable housing within that development that they should not be allowed to negotiate with Broxtowe Borough Council to move such allocations of housing elsewhere in the Borough or buy their way out of the obligation.

83/2018contd.

Following this discussion of the Local Plan Part 2, the Town Clerk was instructed to send a full Minute Reference of this discussion to Broxtowe Borough Council, as the Town Council's official reply to this consultation. Broxtowe Borough Council were also asked to work with the Town Council and D2N2 to ensure that HS2 brought the maximum benefits to the Town and surrounding area.

Further Members were encouraged to make their own, personal comments re the Broxtowe Borough Council Local Plan Part 2 direct to Broxtowe Borough Council using the online facility on the Broxtowe Borough Council Web Site.

The Town Clerk was also requested to send copies of this Minute Reference to Members in attendance at this Meeting for information only.

Details

Agent	
Please provide your client's name	
Your Details	
Title	
Name	
Organisation (If responding on behalf of an organisation)	Nottinghamshire County Council
Address	
Telephone Number	
Email Address	
Would you like to be contacted regarding future planning policy consultations?	Yes
If you wish to comment on more than one issue you will need to submit a form for each representation.	

Policy relates to

Please specify what your comment relates to					
Policy number	Page number	Policy text/ Paragraph number	Policies Map	Sustainability Appraisal	Other (e.g. omission, evidence document etc.)
3: Main Built up Area Site Allocations		3.2			

Question 1: What does your comment relate to? Please specify exactly

Question 2

Question 2: What is the issue with the Local Plan?	
Do you consider this paragraph or policy of the Local Plan to be:	
2.1 Legally compliant	Yes
2.2 Compliant with the duty to co-operate	Yes
2.3 Sound	No

Question 3

Question 3: Why is the Local Plan unsound? Please only answer this question if you answered 'No' to 2.3 above	
If you think this paragraph or policy of the Plan is not sound, is this because:	
It is not justified	Yes
It is not effective	Yes
It is not positively prepared	Yes
It is not consistent with national policy	No

Additional details

<p>Please give details of why you consider this part of the Local Plan is not legally compliant, is unsound or does not comply with the duty to co-operate. Alternatively, if you wish to support any of these aspects please provide details.</p>	<p>The County Council supports the inclusion of Policy 3.2 which provides a site specific policy for development at Toton as a Strategic Location for Growth in accordance with the Aligned Core Strategy and the removal from the Green Belt of the area as shown on Map 30.</p> <p>Toton will be the location of the most connected station on the High Speed Network outside London and partners including the Borough Council have endorsed and published an East Midlands HS2 Growth Strategy which identifies Toton Hub Station as the location for an Innovation Campus linked to the University Sector capable of delivering up to 10,000 jobs.</p> <p>Whilst these ambitions will not be realised until the station is built and surrounding areas developed after 2028, there is a need to work and plan for this now.</p> <p>The County Council understands that the allocation of 500 dwellings within the Local Plan is not necessarily to be regarded as a maximum and there will need to be flexibility both within this plan period and beyond to deal with the opportunity which the Hub Station and the Growth Strategy presents. The County Council recognises that the Borough Council needs to demonstrate delivery of housing and that some housing development is required at Toton prior to 2028. The proposals for housing within policy 3.2 in the period to 2028 will not necessarily prejudice the wider development of the strategic site if the density and location of housing is appropriate, but this will need constant attention and liaison with key partners including Nottinghamshire CC as highway and transport authority. In view of the challenges this presents it would be preferable if a further bullet point were added to Key Development Requirements to ensure that applications will be judged against their fit with the emerging plans and proposals for the access to and design of the strategic employment site and the HS2 Hub Station .</p> <p>The County Council notes that the Infrastructure Delivery Plan text relative to the Toton strategic location for growth (pages 39 to 48 inc.) advise that the allocation of the Toton Strategic growth site needs to be considered in the round with the land at Chetwynd Barracks. This linkage should be made within the policies for Chetwynd Barracks and Toton Strategic Growth site.</p> <p>The County Council considers the location of this policy within the Plan (at the end of Policy 7 and titled Beyond the Plan period) unusual and out of place. The allocation is dealing with a site which is expected to deliver development within the plan period and it should be included within section 3, following site 3.1 as a strategic allocation for this plan period, whilst acknowledging that much development is expected to be delivered in the period beyond 2028 in accordance with a review of the Aligned Core Strategy.</p>
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Question 4

Question 4: Modifications sought	
<p>Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this modification will make the Local Plan legally compliant or sound.</p>	<p>Add additional bullet point in the panel "key development requirements within the Plan period"</p> <p>"Located and designed to complement and not prejudice proposals for access to the HS2 Hub Station and Innovation Village which is to be delivered beyond the plan period".</p> <p>Reference should be made to the highway infrastructure for the Toton Strategic growth site needs to be considered in the round with that requirement for development at Chetwynd Barracks. This linkage should be made within the policies both for Chetwynd Barracks and Toton Strategic Growth site.</p> <p>Move Policy 3.2 from location within the Plan to a more logical location after Policy 3.1 to acknowledge it is not all development beyond the plan period .</p>

Question 5

Question 5: Public Examination Attendance

If your representation is seeking a modification, do you consider it necessary to participate at the public examination?	Yes
If you wish to participate at the public examination, please outline why you consider this to be necessary	To help contribute to the discussion of this strategic site in terms of highway matters and help clarify any points raised for the Planning Inspector.

Broxtowe Borough Council

Potential impact of proposed developments on sewerage infrastructure assets

Date: 17/10/2017

NOTE: The purpose of these desktop based assessments are to indicate where proposed development MAY have a detrimental impact on the performance of the existing public sewerage network taking into account the size of the development proposals.

For most new development provided the surface water in managed sustainably through use of a SuDS the additional foul only flows will have a negligible impact on existing sewer performance but where there are pre-existing capacity constraints additional capacity improvements may be required.

Where subsequent detailed modelling indicates capacity improvements are required such work will be phased to align with development occupancy with capacity improvement works will be funded by Severn Trent Water. However, whilst Severn Trent have a duty to provide additional capacity to accommodate planned development, we also have a requirement to manage our assets efficiently to minimise our customers' bills. Consequently to avoid potential inefficient investment we generally do not provided additional capacity until there is certainty that the development is due to commence. Where development proposals are likely to require additional capacity upgrades to accommodate new development flows it is highly recommended that potential developers contact Severn Trent as early as possible to confirm flow rates and intended connection points. This will ensure provision of additional capacity can be planned into our investment programme to ensure development is not delayed.

Note: These are desktop assessments using readily available information and have not been subjected to detailed hydraulic modelling

Site Ref	Site Name	Size	Units	Sewage Treatment Works Catchment	Sewerage Comment	Potential impact on sewerage infrastructure
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Toton, Stapleford and Bramcote

3.1	Chetwynd Barracks	91.5 ha	500	Toton STW	Sewer records do not exist for Chetwynd Barracks. Therefore the current drainage at the site is unknown. It is assumed the majority of flows will join the 300 dia combined sewer on Chetwynd Road. RPA predicts flooding in a 30 year storm. D/S of Chetwynd Road there is a large flooding cluster on Crofton Road. An FA scheme has been delivered which protects properties internally up to 40 year storm and externally up to a 20 year storm. There are no pollution incidents recorded D/S at the Attenborough Lane PS. Surface Water flows can be drained to local brook running through Chetwynd barracks.	Low
	Toton	UNK	500	Stapleford STW	It is likely that a capital scheme would be required for a new gravity sewer to take foul flow from the development to Stapleford STW in the North West. There are numerous hydraulic flood incidents on incoming pipes to the STW. If foul flows were to be discharged to the south the topography suggests a pumping station would be required. Pipes on Stapleford Lane where it would be expected to discharge to are predicted to flood in low RPs. There are foul flooding incidents recorded to the south off Stapleford Lane. Surface water will be able to drain to pre-existing surface water systems in the vicinity of the development.	High
	Bramcote	UNK	300	Stoke Bardolph STW	It is expected that foul flows will be connected to 225mm dia pipe on Latimer Drive. RPA does not predict flooding in storm events up to 40 yrs. Flows from the east of the site may have to be pumped due to the topography of the site.	Low
	Stapleford	UNK	240	Stapleford STW	It is likely that a capital scheme would be required for a new gravity sewer to take foul flow from the development to Stapleford STW in the North West. There are numerous hydraulic flood incidents on incoming pipes to the STW. If foul flows were to be discharged to the south the topography suggests a pumping station would be required. Pipes on Stapleford Lane where it would be expected to discharge to are predicted to flood in low RPs. There are foul flooding incidents recorded to the south off Stapleford Lane. Surface water will be able to drain to pre-existing surface water systems in the vicinity of the development.	Med

3.6	Beeston Maltings	1.3 ha	56	Lilac Grove STW	Based on topographic levels it is likely the development will connect to the sewage system on Cartwright Way to a 150 mm dia pipe. Surface water would also drain to the existing system on this road. The model does predict flooding on low RPs D/S on Ireland Avenue. However there are no incidents of flooding reported.	Low
	Beeston Cement Depot	UNK	21		Sewage from the development is likely to join the network on Station Road into a 375 mm dia combined sewer. Surface Water will be able to be connected to local surface water network. There are no reports of flooding in the area and flooding is not predicted in low return periods.	Low
	Wollaton Road Beeston	UNK	12		The building adjacent to the proposed development site has experienced repeat floodings recently. Return period analysis predicts flooding in a storm with a two year return period. The development is unlikely to have a noticeable impact to Severn Trent's sewage infrastructure, however, the development is likely to flood.	Low

	Awsworth	UNK	350	Newthorpe STW	Surface Water from the development will be able to drain to a local watercourse. Foul water from the development will join a 225mm dia combined sewer running across the development site. Flooding in a low return period is predicted downstream and there are pollutions recorded at Awsworth - A610 TPS. There are also a large number of flooding incidents upstream of the development in the south of Awesworth.	Med
4.1	Awsworth	UNK	250	Newthorpe STW	Surface Water from the development will be able to drain to a local watercourse. Foul water from the development will join a 225mm dia combined sewer running across the development site. Flooding in a low return period is predicted downstream and there are pollutions recorded at Awsworth - A610 TPS. There are also a large number of flooding incidents upstream of the development in the south of Awesworth.	Med

	Brinsley	UNK	150	Newthorpe STW	Foul flows from the development will join a 225 mm dia combined sewer running adjacent to the development site. Surface water from the development will be able to drain to Brinsley Brook. Flooding is not predicted in low return periods locally and there are no reported flooding incidents near the development	Low
			110	Newthorpe STW	Foul flows from the development will join a 225 mm dia combined sewer running adjacent to the development site. Surface water from the development will be able to drain to Brinsley Brook. Flooding is not predicted in low return periods locally and there are no reported flooding incidents near the development	Low

6.1	Walker Street	9	230	Newthorpe STW	Foul and surface water flows will join pipes on Greenhills Avenue. Flooding is not predicted in low periods downstream of the development. However there are a number of recorded flooding incidents that additional flow could exacerbate.	Low
	Kimberley	UNK	600	Newthorpe STW	Foul flows from the development will join the 750 mm dia existing combined sewer which runs through the site. Surface Water from the development can join the existing surface water network which runs through the proposed development site. Flooding is predicted in a low return period storm on the combined system close to the development site. There is a repeat internal flooding caused by the combined sewer. The development is likely to exacerbate the flooding at this property.	Med

[REDACTED]

From: Councillor Richard MacRae [REDACTED]
Sent: 03 November 2017 15:40
To: Policy; Saunders, Steffan
Subject: The Part 2 Local Plan

I am sending in my comments and concerns regards Part 2 Local Plan as they need to be in before 5pm today.

I do not feel that more development should take place on the West of Coventry Lane as this will also join up with the development on Field Farm, I find it sad that the Council never made it clear they own the land behind Bramcote Crematorium in the past. There is already enough development taking place in this area, also the Stapleford Neighbourhood Plan has suggested alternative sites for development, this should be taken into consideration.

Attention was drawn to comments made on page 12 of the document re 'Employment where it was stated that 'Broxtowe was a thriving and vibrant place with access to services jobs and opportunities for all.' The Meeting saw no evidence for this statement. Likewise, the comments relating to 'Community Safety' where Members were concerned there was no evidence to justify this statement or proposals of how the aspirations would be achieved.

I am aware Stapleford Town Council have submitted the above and I have to say I fully agree with the statement, Community Safety and Broxtowe will be a safe place, sadly this is something that many people in Stapleford do not feel at the minute, anti social behaviour and drugs are a major issue that need to be tackled asap, apart from a lot of talking we are not seeing much evidence of anything being done and most of the people causing these issues sad to say are Council Tenants, breach of Tenancy Agreement comes to mind.

Regarding HS2 again the Town Council have said the following **Not enough attention was being paid to the opportunities that would arise with the development of HS2 and associated projects.** And again I fully agree and it would seem meetings have taken place yet Stapleford Councillors and local residents who will of course be affected have not been invited to such meetings. One reason I proposed the Town Council set up a HS2 Working Group.

With regard to 'Health and well-being', page 16 point viii) this was an area that concerned the Town Council as there appeared to be an absence of proposals to achieve the improved health and well-being of the Town's residents or make any positive suggestions for the development of new community facilities within the Town.

Again the above is what the Town Council have said and i am very disappointed that with the future closure of the Stapleford Community Centre there is no mention of any improvements to any other Community facilities, it would be good to put all efforts into the regeneration of the Pavilion on Hickings Lane Recreation Group and also the play area too, it is a lost opportunity and a great place which could do with improvements all around. maybe using section 106 funding.

Also the Speed Humps in Stapleford need to be removed, this would be a huge benefit to the businesses are more people would drive through Stapleford instead of around the Town Centre. Also removing htem would help with improving the Air Quality in the Town Centre.

Talking of the Town Centre it is about time the boundary was extended to include all the shop from Halls Road down to Bessell Lane, instead of shrinking the area.

There is no way for people to get regular transport from Stapleford North Ward up to the Tram Terminus on Toton Lane, Stapleford and there is no Bus to or from Stapleford in the evening to get to and back from Beeston at all.

I would also like to see the development of affordable housing on future developments increased as the current 10% figure is to low especially when compared to other areas.

There is no mention of development and regeneration of the Walter Parker VC Memorial Square on Derby Road, another missed opportunity as at the minute is is to cluttered, I did actually speak to Phil Horsefield about this and as far as i am aware he passed on my ideas to Ryan Dawson. I hope these can be considered in more detail.

Many thanks

Councillor Richard MacRae
Stapleford North Ward

[Redacted signature]



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[REDACTED]

From: Town Planning [REDACTED]
Sent: 03 November 2017 17:54
To: Policy
Subject: RE: BROXTOWE PART 2 LOCAL PLAN - PUBLICATION VERSION CONSULTATION

Our ref: HS2-BXC-PE-029

Dear Steffan Saunders,

Thank for consulting HS2 on Part 2 of Broxtowe's Local Plan, we have the following comments to make.

Firstly, we 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.

You will be aware that HS2, East Midlands Councils (including Broxtowe Borough Council) in connection with other relevant stakeholders such as the Midlands Engine and Midlands Connect are actively involved in discussions to maximise how the proposed station at Toton interacts with Nottingham's aspirations for the proposed Nottingham Express Transit (NET).

The Local Plan notes that there is a traffic aspiration for the borough to enable '*...the provision of a comprehensive and well contained transport interchange in very close proximity to the station and ideally being contained entirely on HS2 operational land to be wholly within HS2's operational land*' (3b.6 Pg 81). As you may be aware the provision of the Nottingham Express Transit (NET) is not within HS2's scope and therefore HS2 are unable to fund or build this project. However, HS2 have established that a passive provision for the proposed tram can be provided to enable connection to the East Midland Hub.

HS2 would also welcome early engagement with regards to any proposed development at Chetwynd Barracks, to ensure that disruption is minimised and any potential interface issues or conflicts can be appropriately managed.

I trust that this response is sufficient, but should you want to discuss these points further please contact me.

Thank you

Sent: 18 September 2017 14:57 -

To: Town Planning

Subject: BROXTOWE PART 2 LOCAL PLAN - PUBLICATION VERSION CONSULTATION

18th September 2017

Dear Sir / Madam,

BROXTOWE PART 2 LOCAL PLAN - PUBLICATION VERSION CONSULTATION

The Council is inviting your views on the Publication Version of the Part 2 Local Plan (which follows the Part 1 Local Plan, the Aligned Core Strategy).

The Part 2 Local Plan allocates specific sites to meet the development requirements set out in the Aligned Core Strategy and details further policies against which future planning applications will be assessed.

The Publication Version of the Part 2 Local Plan is the version of the Plan that Broxtowe Borough Council wants to submit to the Secretary of State for examination. An independent planning inspector will examine the Plan to make sure that it is **legally compliant** and **sound** and that the **Duty to Cooperate** has been met. Any responses you make to this consultation will be considered by the planning inspector.

Details of where to view the consultation documents and how to respond to the consultation, can be found on the reverse of this letter, or on our website; www.broxtowe.gov.uk/part2localplan.

The consultation period will run from **Monday 18th September 2017** to **5.00pm on Friday 3rd November 2017**; all representations must be received within this time.

For further information, please contact the Planning Policy Team at Broxtowe Borough Council by telephoning **0115 917 3452** or e-mailing: policy@broxtowe.gov.uk.

Yours faithfully

Steffan Saunders
Head of Neighbourhoods and Prosperity
Broxtowe Borough Council
Neighbourhoods & Prosperity
Chief Executive's Department
Council Offices, Foster Avenue
Beeston, Nottingham, NG9 1AB
Tel: 0115 917 7777
www.broxtowe.gov.uk

Planning and Compulsory Purchase Act 2004

The Town and Country Planning (Local Planning) (England) Regulations 2012 (Regulations 18, 19 & 20)

Statement of Representation Procedure & Location of Documents for Inspection

Broxtowe Borough Part 2 Local Plan – Publication Version

The Part 2 Local Plan covers the whole administrative area of Broxtowe Borough and forms the second part of the development plan until 2028. The Part 2 Local Plan includes site allocations for specific development and policies that will be used to manage development, and land uses, within the Borough. It has been published for a period of public representation before submission to the Secretary of State

Public Representation Period: 18th September 2017 to 5pm on 3rd November 2017

All representations must be submitted within this period and received by the Council by 5:00 pm on Friday 3rd November 2017.

How to make Representations:

Responses should be made on the appropriate forms; these are available

- . Online at www.broxtowe.gov.uk/part2localplan

- Paper copies are available at the locations listed below, all paper forms should be sent back to: **Planning Policy, Broxtowe Borough Council Offices, Foster Avenue, Beeston, NG9 1AB**

Representation forms can also be requested from the Planning Policy team at the Borough Council by telephoning 0115 917 3452 or e-mailing: policy@broxtowe.gov.uk

Locations of Documents:

Copies of the Broxtowe Borough Part 2 Local Plan and supporting documentation (Policies Map, Sustainability Appraisal and Statement of Consultation) are available for inspection at the following locations:

- Online at www.broxtowe.gov.uk/part2localplan
- Paper copies are available at;
- Broxtowe Borough Council Offices, Foster Avenue, Beeston, NG9 1AB (8.30am to 5.00pm Monday – Thursday and 8.30am – 4.30pm on Fridays);
- Libraries within the borough;
 - Beeston Library, Foster Avenue, Beeston, Nottingham NG9 1AE
 - Eastwood Library, Wellington Place, Eastwood NG16 3GB
 - Inham Nook Library, Barn Croft, Chilwell NG9 4HU
 - Kimberley Library, Main Street, Kimberley, NG16 2LY
 - Stapleford Library, Church Street, Stapleford, NG9 8GA
 - Toton Library, Stapleford Lane, Toton NG9 6GA
- Opening times for the above libraries can be found at <https://www.inspireculture.org.uk/reading-information/find-a-library/>

Large print versions of these notices are available on request.

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Steffan Saunders
Head of Neighbourhoods and Prosperity
Directorate of Legal and Planning Services
Council Offices
Foster Avenue
Beeston
Nottingham
NG9 1AB

30 October 2017

Dear Steffan

Broxtowe Local Plan Part 2 Consultation

Thank you for allowing us the opportunity to respond to your consultation document. New treatments and an aging population mean that pressures on services are greater than they have ever been, as people are living longer, often with very complex conditions. An increase in local population as a result of new housing developments compounds that pressure particularly on primary care - family doctor services. Having the right infrastructure in place in primary and community settings is crucial for the successful delivery of the Sustainability and Transformation Plan (STP) ambitions and the GP Forward View (GPFV). The ability to transform care and keep services sustainable will only be possible if efficient, fit-for-purpose, high quality facilities underpin the delivery of services.

Workforce recruitment for GPs in particular is paramount for sustaining quality general practice provision. Good quality fit for purpose primary care facilities are a key part of attracting the necessary workforce to support the existing and new population as a result of these housing developments.

In recent years there have been a number of developments approved which have had a major impact on our ability to provide primary care services. As a consequence we would like to work with the Borough Council to explore a better way of planning for care homes and retirement living facilities. We are often the last public sector organisation to find out that a care home is opening; a building has a change of use or that retirement facilities are being developed. 65% of the NHS budget is spent on the over 65s and understandably the elderly are the predominant users of health and social care services so the impact of such changes on the health and social care system are huge for a relatively small part of the population.

In terms of this consultation document, we have taken each of your options in turn and outlined our current position with regards to primary care facilities, indicating where we have areas of risk.

Potential Site Allocations Sites Adjacent to the Main Urban Area

<p>Policy: 3.1 Chetwynd Barracks 500 homes with potential for 800+ overall</p> <p>Land for Medical Centre required in order to make plan effective and therefore sound</p>	<p>The potential for 800+ dwellings (with a maximum of 1,500) presents significant concern with respect to local health service provision. The nearest facilities for this development, and where patients are likely to register, is Chilwell Valley & Meadows Surgeries which comprise a main surgery (Valley) which has no development potential; and a branch surgery (Meadows) which has some expansion potential.</p> <p>Based on 2.3 residents per dwelling we would anticipate an increased patient population of up to 3,500 patients if the total of 1,500 dwellings was achieved, which would require 2 full-time General Practitioners, over and above the current service provision.</p> <p>Given the size of this development and the potential for further development at Toton, together with the limited / non-existent expansion potential of the current facilities, we are to consider the option of a new Primary Care Centre for the Chilwell / Toton area subject to funding being made available. Therefore, in order for the plan for Chetwynd Barracks to be effective and sound, we request a reserved site within this development to provide primary care services to the residents of this area.</p> <p>We are not in a position to confirm the size of site required at this stage; however based on similar size developments it would be no more than 1 acre to serve a potential population of around 18,000 patients. Funding contributions should be sought through Section 106.</p>
<p>Policy: 3.2 Toton – 500+ homes</p>	<p>We understand that we have missed the opportunity to comment on this proposal as it stands currently at 500 homes. However, we consider that there may be further development in this area and would like to offer the following comments:</p> <p>The nearest facilities for this development is Chilwell Valley & Meadows Surgeries which comprise a main surgery (Valley) which has no development potential; and a branch surgery (Meadows) which has some expansion potential.</p> <p>We would like to consider any expansion to the Toton development over and above the original 500 houses alongside the Chetwynd Barracks development which</p>

	affects the same GP practice.
<p>Policy: 3.3 & 3.4</p> <p>Bramcote, East of Coventry Lane 300 homes</p> <p>Stapleford, West of Coventry Lane 240 homes</p>	<p>The nearest facilities to these developments are Bramcote Surgery and Hickings Lane Medical Centre.</p> <p>Hickings Lane Medical Centre has recently extended the surgery to take account of the new resident population generated by 450 dwellings (a potential of 1,035 residents based on 2.3 residents per dwelling) at Field Farm. There is potential to further expand this facility.</p> <p>Bramcote Surgery is a purpose built facility with some potential for small scale development which could assist with the expansion of patient population from these two developments.</p> <p>We are also aware of discussions regarding the development of the old Bramcote Hills Golf Course for retirement / continuing care privately owned units. This will, if it goes ahead, compound capacity issues within the existing practices.</p> <p>We ask the Borough Council to request on our behalf a Section 106 contribution to support the expansion to the physical capacity of these existing facilities in order to provide health services to the additional 1,242 residents these developments will attract.</p>
<p>Beeston (339 homes / 780 residents)</p> <p>Policy: 3.5 Seven Trent (Lilac Grove), Beeston 150 homes</p> <p>Policy: 3.6 Beeson Maltings, 56 homes</p> <p>Policy: 3.7 Cement Depot Beeston, 21 homes</p> <p>Policy: 3.8 Wollaton Road, Beeston, 12 homes</p> <p>Policy: 11 Beeston Square, 100 homes (minimum)</p>	<p>There are four GP practices providing healthcare to the residents of Beeston; Abbey Medical Centre, The Manor Surgery, The Oaks Medical Centre and West End Surgery.</p> <p>The Oaks Medical Centre is currently undergoing an extension to their purpose built facility in response to the planned housing developments underway in Beeston. However, the future developments as outlined in the Local Plan Part 2 whilst not significant when considered alone, need to be considered in its entirety together with what is underway and will have significant impact upon the physical capacity of practices to provide health services. There is some potential for small scale developments to assist with this further expansion of the patient population in particular from the Seven Trent and Beeston Square developments.</p> <p>We would ask for a Section 106 contribution to be</p>

	available to this locality to increase the physical clinical space required to meet the needs of this increase in population over and above that already underway as part of The Oaks Medical Centre expansion.
<p>Policy: 4.1 Awsworth West of Awsworth (inside the bypass) 250 homes</p> <p>Policy: 5.1 Brinsley East of Church Lane 110 homes</p>	<p>The nearest facilities to this development and where patients are likely to register are Church St Medical Centre and Church Walk Surgery in Eastwood. See below for details of the Eastwood joint public services proposed development to meet the needs of this increase in population.</p>
<p>Policy: 6.1</p> <p>Eastwood 200 homes + 30 Extra Care Units Walker Street, Eastwood (Map 24)</p> <p>Land for Medical Centre required in order to make plan effective and therefore sound</p>	<p>A new health centre for Eastwood is the CCG's top priority within its Strategic Estates Plan. The old Eastwood Health Centre was considered no longer fit for purpose and has been recently disposed of resulting in there being no local facilities for extended, community based health services in Eastwood.</p> <p>Both GP practices in Eastwood are in separate facilities which can no longer be extended. They are intending to merge into one practice as of April 2018 to provide GP services to 20,000 local residents.</p> <p>We have been working with Nottinghamshire County Council, the land owners, on the preferred solution which would be a One Public Estate public services hub incorporating a new health facility on the Walker Street site (Map 24). Alongside library services and third sector organisations this new facility would also house the two merged GP practices (Church Street Medical Centre and Church Walk Surgery in Eastwood) plus supporting community health service provision.</p> <p>In order that the plan for Eastwood is effective and therefore sound, part of the Walker Street site must be allocated for a new, purpose built health facility to sit behind the existing library with direct access to the main road with its public transport links ensuring it is easily accessible to the community. A one acre site is required (GIA 2000m2 of two or three storeys dependent upon meeting planning requirements). Direct vehicular access would be required to Walker Street if the site is also identified as the preferred site for a co-</p>

	located blue light service base. Funding contributions should be sought for this development through Section 106.
<p>Kimberley (167 homes / 385 residents)</p> <p>Policy: 7.1 Kimberley Depot 105 homes</p> <p>Policy: 7.2 South of Eastwood Road 40 homes</p> <p>Policy: 7.3 Eastwood Road Builders Yard 22 homes</p>	<p>The nearest facility to these developments is Hama Medical Centre, Kimberley. This is a purpose built facility with potential to expand through internal re-organisation of rooms changing their use from clinical to non-clinical physical space.</p> <p>We would ask for a Section 106 contribution to be requested in order to increase the physical clinical space required to meet the demands of the increase in population brought about by the housing developments.</p>

In summary, we have considered the impact on our existing facilities for each of the potential developments detailed in the Local Plan Part 2. Our main challenges are:

- **Policy: 6.1 Eastwood** where we have had extended discussions with Nottinghamshire County Council regarding a public sector hub and require a site of 1 acre to be reserved on the Walker Street site for this;
- **Policy: 3.1 Chetwynd Barracks / Policy: 3.2 Toton** where we will do more work on a potential hub servicing this area but would ask for a reserved site on the Barracks site to be identified for a potential health facility;
- The impacts of other developments in the plan are of a smaller scale and could be resolved by relatively modest extensions and/or internal re-design. For these we ask for Section 106 contributions to fund the necessary works to meet the health needs of the increase in population.

I hope you find this of use in your considerations. Please let me know if you need any further information.

Yours sincerely



**Director of Contracting and Deputy Chief Officer
NHS Nottingham West CCG**

Bramcote Neighbourhood Forum
Response to Broxtowe Borough Council Part 2 Plan

Submitted by: Paul Nathanail of [REDACTED] on
behalf of the Bramcote Neighbourhood Forum

			LEGALLY COMPLIANT		Compliant with Duty to Cooperate		Sound						
POLICY	PAGE / PARA.	TEXT	Yes	No	Yes	No	Yes	No		COMMENTS	MODIFICATIONS SOUGHT	PUBLIC EXAMINATION ATTENDANCE	WHY
Policy 1 Flood Risk			x		x		x					No	
Policy 2 Site Allocations	2.7			x				x	It is not justified	The statement that sites with commitments "of 10 or more dwellings these have been shown on the overview plans" is untrue and misleading - the land of the former Bramcote Hills Golf course was granted outline planning permission for 100 dwellings earlier in 2017 but is NOT shown on the overview plans	The consequences of commitments of more than 10 dwellings on housing land allocation should be considered in the evidence base	Yes	Part 2 is misleading in the way it represents the land committed for housing in Bramcote and therefore fails to provide sound support for land allocation adjacent to the former Bramcote Hills Golf Course
Policy 2 Site Allocations	2.8			x	x			x	It is not justified	The statement that the "the Council has maximised to the greatest possible extent the supply of sites in existing urban areas" is not true as, for example, it has failed to use the air space above the bus tram interchange in Beeston Town Square for residential and also failed to require residential development when granting planning permission for the redevelopment of Phase 1 of BeestonTown Square.		Yes	The Council should demonstrate why areas within the built up part of the Main built Up area are unsuitable for housing whereas an urban extension is
Policy 2 Site Allocations	2.8			x	x			x	It is not justified	The statement that "When sites currently in the Green Belt are selected, exceptional circumstances are demonstrated" is untrue for the land in Bramcote - 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	The permanence and openness of the green belt has been compromised by the proposals in Part 2 and no exceptional circumstances for the scale and extent of changes to the green belt have been provided.	Yes	The sacrifice of the green belt has not been justified
Policy 2 Site Allocations	"2.10			x	x			x	It is not justified	The statement "the urban and main built up area sites are assessed as being the most sustainable" has not been followed through by keeping land allocation within the main built up area and instead requiring release of the green belt		Yes	Part 2 is misleading as the text and Map 1 are not consistent and the extent of the Main Built Up area is grossly and wrongly over exaggerated
Policy 3 Main Built up Area Site Allocations	Map 2			x	x			x	It is not justified	The map mislabels open countryside adjacent to the M1 and stretching east to Bramcote as Main built Up area	The Map should be amended to reflect the built up area and ensure land allocation is retained within that built up area without urban extension and loss of green belt	Yes	Part 2 is misleading and the consequences of this mismatch between text, map and reality on the ground are enormous
Policy 3 Main Built up Area Site Allocations	3.2			x	x			x	It is not justified	The statement that "It is considered that there are exceptional circumstances required to amend the boundary of the Green Belt to allow residential development." is untrue for the land in Bramcote - 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		Yes	The sacrifice of the green belt has not been justified
Policy 3 Main Built up Area Site Allocations	Map 4			x	x			x	It is not justified	Map 4 omits the committed land on the former Bramcote Hills Golf course and thereby paints a very misleading picture of land allocation in Bramcote. Map 4, however, does illustrate the extent of open countryside east of the M1.		Yes	Part 2 is misleading and the consequences of this mismatch between text, map and reality on the ground are enormous
Policy 3 Main Built up Area Site Allocations	3.1		x		x			x	It is not positively prepared	The requirements fail to state the net housing density to be achieved	A minimum net housing density of 40 per hectare should be added and the effects of this on the total number of houses that can be delivered should be reflected in the list of requirements	No	
Policy 3 Main Built up Area Site Allocations	3.1		x		x			x	It is not positively prepared	The requirement for a small retail / service centre fails to recognise the nearby facilities and would jeopardise the viability of both existing and new businesses	Remove the requirement for a small retail/ service centre	No	
Policy 3 Main Built up Area Site Allocations	3.1		x		x			x	It is not justified	The extent of the public space to the south of the memorial is not shown and there is a potential use of land eminently suitable for housing to be lost in this way	The extent of the public space should be made clear and the reasons for not allocating that land for housing should be reported. There are plenty of green and open spaces within the Barracks.	Yes	It is essential that land allocation is optimised to prevent loss of green belt elsewhere and for the council to comply with National policy on the need to protect the green belt
Policy 3 Main Built up Area Site Allocations	3.3	3.7		x	x			x	It is not justified	The pen picture is inaccurate and fails to point out that part of the land is a county level protected area - the last remant of Bramcote Moor.		Yes	The true nature of the land ought to be understood before making decisions to take it out of the green belt and allocate it for housing
Policy 3 Main Built up Area Site Allocations	3.3	3.8	x		x			x	It is not justified	The figure of 300 houses is not justified and is at odds with both the objectively assessed housing need for Bramcote (ca 180 houses over the plan period) and the various statements by the leasors of this land of 350 or 450-500 homes.		Yes	It is essential that the use of this land is such as to deliver the maximum benefit for the local community and the county council who own the freehold

Bramcote Neighbourhood Forum

Response to Broxtowe Borough Council Part 2 Plan

Submitted by: Paul Nathanail of [REDACTED] on behalf of the Bramcote Neighbourhood Forum

Policy 3 Main Built up Area Site Allocations		3.8	x		x			x	It is not effective	The requirements do not encourage lifts from west of the site to terminate on the land and for pedestrian access to the school.	Provision of a dropping off area and school walking buses should be within the area proposed for housing	Yes	It is essential that the residents of Moor Lane, Thorseby and Arundel Drive do not unnecessarily suffer increased traffic - with associated poor air quality and danger of road traffic accident by parents being unable to drop off their children within walking distance of the schools
Policy 3 Main Built up Area Site Allocations		3.8	x		x			x	It is not effective	The removal of any vegetation from the Moor Lane cutting should be done in such a way that the present stability of the cutting is not compromised now and into the future.			
Policy 3 Main Built up Area Site Allocations		3.8	x		x			x	It is not effective	The caveat "if required" disreagrds the oft and strongly stated desire of local residents for the leisure centre to remain in Bramcote	"if required" should be removed	Yes	Bramcote is being asked to pay a heavy price for no tangible benefit and to face the loss of the leisure centre as well as its green belt alongside increased traffic congestion and air pollution is not compatible with sustainable development
Policy 3 Main Built up Area Site Allocations		3.9		x	x			x	It is not consistent with national policy	The loss of green belt is not recognised in the summary of the sustainability appraisal. The loss of green belt and the loss of the last remnant of Bramcote Moor cannot be trivialised as a very minor disbenefit.	The sustainability appraisal should be revised to accurately reflect the scale of disbenefit loss of green belt and Bramcote Moor would have	Yes	The impact of this flawed assessment of the green disbenefits has knock on consequences to other parts of Part 2.
Policy 3 Main Built up Area Site Allocations		Map 8		x	x			x	It is not consistent with national policy	The map fails to show the status of the Bramcote Moor land and also suggests a housing density of only 19 houses per hectare.	A greater density accompanied by a requirement to pay for a replacement leisure centre should be included.	Yes	The benefits to the local community of a higher housing density generating more funds to pay for a replacement leisure centre should be at the centre of land use decisions in this locality and would better reflect local residents views as well as represent a more sustainable form of development in the area.
Table 4		Table 4	x		x			x	It is not effective	The table shows that Bramcote will house over 440 of the 2729 houses in the entire main built up area of Broxtow. It is ridiculous that such a small area should be taking more than 16% of the housing need while the council allows land to be developed at low densities or not at all elsewhere.		Yes	The negative social, economic and environmental impact of the unfair burden of new housing in Bramcote is a combined effect of a series of failings by the council in formulating its plan.
	82	3b.9		x	x			x	It is not justified	The reference to a leisure hub should not be seen as a replacement for the leisure hub at Bramcote.	The text should be amended to make it clear that any leisure hub at the western extremity of the borough ought to be in addition to the one at Bramcote.	No	
Policy 8 Development in the Green Belt	8.5			x	x			x	It is not effective	We welcome the reporting of "strong support for the protection of the Green Belt" and lament the fact the council has ignored this and considerably reduced the green belt in Bramcote.		Yes	The council has consistently ignored local views expressed formally and at workshops and through the ballot box and is not delivering tangible benefits to the local community in Bramcote while at the same time asking it to bear an enormous and unfair share of the burden of new housing allocation.
	8.3			x	x			x	It is not justified	The Preferred Approach to Site Allocations erroneously assumed that all green belt sites served the same or no purpose in encouraging urban regeneration and this has skewed the council's assessment of the need to take land out of the green belt.		Yes	The flawed assessment of the five functions of the green belt has skewed the allocation of land in the green belt for housing contrary to the strong protection due to the green belt from the NPPF and the manifesto promises at the 2015 & 2017 general elections - both post dating the ACS
Policy 11 The Square, Beeston	11.2		x		x		x			We strongly support the mixed development in the Square, Beeston.	We would encourage the proposed cinema to be of flexible use by including moveable partitions and a stage.	No	
Policy 19 Pollution, Hazardous Substances and Ground Conditions	2			x	x		x			The required site investigation should be carried out by a competent person as required by the NPPF	The text should be amended to reflect the need for a competent person to carry out the site investigation	No	
Policy 20 Air Quality	119		x		x		x			We welcome the three measures to protect air quality.		No	
Policy 24 The health impacts of development	146		x		x		x			We welcome the requirement for a health impact assessment		No	
Policy 26 Travel Plans	153		x		x		x			We welcome the requirement for travel plans to be submitted		No	
Policy 27 Local Green Space	154		x		x		x			We support the designations as Local Green Space in Bramcote and ask the Council to consider the additional areas being designated as Local Green Space in the Bramcote Neighbourhood Plan	We are disappointed that none of the former Bramcote Hills Golf course is to be designated as local green space	No	
Policy 27 Local Green Space	27.2			x	x			x		The statement that the "The land at Bramcote and Stapleford (item 3 in the policy) comprises a former area of Green Belt between Moor Farm Inn Lane, Moor Lane, Derby Road, Ilkeston Road and Coventry Lane" is untrue. Such land would only be taken out of the green belt by the adoption of this part 2.	The text should be amended to accurately reflect the present and new status of the land and the role of Part 2 in any change	No	
Policy 28 Green Infrastructure Assets	157		x		x		x			We welcome the policies on green infrastructure.			
Policy 28 Green Infrastructure Assets	Map 62		x		x			x	It is not justified	The map erroneously shows (2.11) a continuous corridor through the former Bramcote Hills Golf - part of which is committed having been granted planning permission earlier in the year		Yes	This map is one several misleading maps which seek to underrepresent the enormous damage to the local environment Part 2 will have on Bramcote
Policy 30 Landscape	165		x		x		x			We note that this policy would be contradicted by housing development in land currently within the green belt and ask the council makes provision for suitable compensation to be provided in such cases			
Appendix 4	187		x		x			x	It is not justified	The Moor Lane cutting is omitted from the list.	The Moor Lane cutting should be added to the list	Yes	The considerable scientific and cultural significance of this cutting and its educational value should be recognised and included in Part 2.

Broxtowe Part 2 Local Plan

Agent

Please provide your client's name	
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Your Details

Title	[REDACTED]
Name	[REDACTED]
Organisation (if responding on behalf of the organisation)	Chetwynd: The Toton and Chilwell Neighbourhood Forum
Address	[REDACTED] [REDACTED]
Postcode	[REDACTED]
Tel Number	[REDACTED]
E-mail address	[REDACTED]

Comments should be received by 5.00pm on Friday 3 November 2017

If you wish to comment on several policies, paragraphs, or sites, please use a separate form for each representation.

If you would like to be contacted by the Planning Policy Team regarding future consultations.

Please tick here

Yes

Please help us save money and the environment by providing an e-mail address that correspondence can be sent to:

Question 1: What does your comment relate to? Please specify exactly

Document	Policy number	Page no	Policy text / para no.
Part 2 Local Plan	Policy 1: Flood Risk	20	Para 1.4
	Policy 2: Site Allocations		
	Policy 3: Main Built up Area: Policy 3.1	30	Pol 3.1, Para 3.5
	Policy 3: Main Built up Area: Policy 3.2	81	Para 3b.6, 3b.7
	Policy 4: Awwsworth		
	Policy 5: Brinsley		
	Policy 6: Eastwood		
	Policy 7: Kimberley		
	Policy 8: Development of Green Belt		
	Policy 9: Retention of ...employment sites		
	Policy 10: Town Centre ...uses		
	Policy 11: The Square, Beeston		
	Policy 12: Edge of Centre, Eastwood		
	Policy 13: Proposals.....		
	Policy 14: Centre....		
	Policy 15: Housing size, mix and choice		
	Policy 16: Gypsies and Travellers		
	Policy 17: Place-making, design & amenity	111	Pols 1, 2
	Policy 18: Shopfronts....		
	Policy 19: Pollution, Hazardous Substances		
	Policy 20: Air Quality		
	Policy 21: Unstable land		
	Policy 22: Minerals		
	Policy 23: Proposals affecting designated...	124, 125	Para 23.1, 23.2, 23.5
	Policy 24: The health impacts of....		
	Policy 25: Culture, Tourism and Sport	152	Pol 1, 2 Para 25.1
	Policy 26: Travel Plans	153	Para 26.1
	Policy 27: Local Green Space	155	Para 27.5
	Policy 28: Green Infrastructure Assets	157, 158	Pol 1.b, Para 28.2, 28.5
	Policy 29: Cemetery Extensions		
	Policy 30: Landscape		
	Policy 31: Biodiversity Assets		
	Policy 32: Developer Contributions	171	Para 32.1

Policy number	Page number	Policy text / Para number
1 Flood Risk	20	Para 1.4

Question 2. What is the issue with the Local Plan?

Do you consider this paragraph or policy of the Local Plan to be:	Yes	No
2.1 Legally compliant		
2.2 Compliant with the duty to co-operate		
2.3 Sound		X

Question 3. Why is the Local Plan unsound?

If you think this paragraph or policy of the Plan is not sound, is this because:	
It is not justified	
It is not effective	X
It is not positively prepared	
It is not consistent with national policy	

Your Comments:

Resident's comments:

"There is already serious flood risk in the Erewash Valley at Toton Sidings. Adding new housing in the area will only increase the risk of flash flooding in the area especially nearby houses on Goodwood Road and side roads."

"All housing should have solar panels + rain water harvesting systems built-in."

1. We are seriously concerned with the increased risk of flash flooding that development in and around Toton Sidings will cause. We believe para 1.4 needs to be strengthened to reflect the specific risk in the Sidings due to not being currently defended by flood protection measures
2. A resident has suggested all new housing (and by extension, commercial developments) should have solar panels & rain water harvesting systems incorporated 'by default'. It is not clear where this suggestion should be included in our response but added here following advice by Steffan Saunders on Oct 30th. Solar panels and water harvesting systems clearly have a role to play in reducing carbon dioxide emissions. We would like to see a positive 'Justification' paragraph that encourages the incorporation of these systems where feasible.

Question 4. Modifications sought

[CTTC Forum text in: ***Black bold italic***]

Amend para 1.4 to:

1.4 With regard to point 4 of the policy, flood mitigation will be required in all cases (whether the site is defended or not). Examples of mitigation include flood resistance/resilience measures, emergency planning and good site design that does not increase risk to others. The Environment Agency will also require flood compensation (i.e. at least equivalent replacement of lost flood storage) in areas, ***such as the Erewash Valley at Toton Sidings***, which are not defended by an appropriate standard of flood protection (such as the Nottingham Trent Left Bank Flood Alleviation Scheme).

Create new para to state something along the lines of:

1.n The Council recognises the impacts of Climate Change – as detailed in Aligned Core Strategy Policy 1: Climate Change – and wishes to encourage the reduction of carbon emissions through the installation of renewable energy solutions such as solar panels and rain water harvesting systems in [set % aspiration] of new housing and all new commercial developments.

Policy number	Page number	Policy text / Para number
3.1 Chetwynd Barracks	30	Policy 3.1 / para 3.5

Question 2. What is the issue with the Local Plan?

Do you consider this paragraph or policy of the Local Plan to be:	Yes	No
2.1 Legally compliant		
2.2 Compliant with the duty to co-operate		
2.3 Sound		X

Question 3. Why is the Local Plan unsound?

If you think this paragraph or policy of the Plan is not sound, is this because:	
It is not justified	
It is not effective	X
It is not positively prepared	
It is not consistent with national policy	

Your Comments:

Residents' comments include:

"[...] Barracks to be treated as one entity and not split up into separate development plots"

"Keep Chetwynd Road [Chilwell] closed." "Chetwynd Road: make it a cycle & pedestrian route only?" "Chetwynd Road to be opened both ends to share new traffic load."

"Keep Hobgoblin wood." "Keep trees on the west side of Barracks - from the quarry upwards."

"All large trees on the Barracks to be the subject of tree preservation orders"

"New feed Road into Depot from Bardills essential (with Tram/Bus/Cycle links?)"

"Re-route Erewash Country trail & public footpath down through the eastern edge of the Barracks site to exploit a newly created green corridor"

"Sports provision needs to be included on the Barracks site to protect current facilities"

"[...] War memorial must be protected and given plenty of space. [...]:"

1. Fourteen residents specifically commented on Chetwynd Barracks – although all comments submitted were, of course, triggered by future developments of the Barracks and HS2 Station.
Some comments were contradictory (opening Chetwynd Road, Chilwell) but this is not surprising given the impact the development of the site will have and the depth of feeling by residents.
2. Specific additions to Policy 3.1 (para 3.5) are therefore sought to strengthen current requirements

Question 4. Modifications sought

[CTTC Forum text in: ***Black bold italic***]

Amend Policy 3.1 (at para 3.5) to:

3.5 The following key development requirements must be met.

Key Development Requirements:

- 500 Homes (within the plan period), 800+ overall.
- ***The Barracks must be treated as one entity and not split up into separate development plots***
- Provide attractive and convenient walking and cycling connections to the proposed HS2 station and to the tram.
- Provide a bus route through the site, ***including access to the site from Chetwynd Road, Chilwell. However, only buses should be given access to the site from this eastern gateway.***
- ***New access road is needed to the site from the north to fall in line with HS2 Growth Strategy***
- Retain and enhance Green Infrastructure corridors around the eastern and northern areas of the site ***including the creation of footpaths and cycle ways***
- Provide a new Primary School within close proximity to the open space at the east of the site.
- Link open space at the east of the site.
- ***Enhance the provision of sports facilities at the south east of the site***
- Retain existing large trees and grass verges and incorporate these into a boulevard approach to the street scene. ***All large trees on the Barracks will be subject to Tree Preservation orders once the site is released***
- Provide public access to the [Listed Memorial](#), ***the associated gardens and all heritage assets (still to be formally registered) on the site***
- Provide public space to the south of the memorial and retain/enhance the existing memorial garden.
- Provide ~~small~~ retail/service centre ***sufficient*** to meet local need along the main through route.
- Provision of small scale employment development.

Policy number	Page number	Policy text / Para number
3.2 Land in vicinity of the HS2 Station at Toton	81	3b.6 & 3b.7

Question 2. What is the issue with the Local Plan?

Do you consider this paragraph or policy of the Local Plan to be:	Yes	No
2.1 Legally compliant		
2.2 Compliant with the duty to co-operate		
2.3 Sound		X

Question 3. Why is the Local Plan unsound?

If you think this paragraph or policy of the Plan is not sound, is this because:	
It is not justified	
It is not effective	X
It is not positively prepared	
It is not consistent with national policy	

Your Comments:

Residents' comments:

"If residents only parking is introduced, it needs to be at zero cost to residents"

"Size of the depth of the "green corridor" to the south of the boundary and definitive information as to whether this corridor is STRICTLY for wildlife or inclusive of pedestrian access? Further, some categorical assurance as to who will be responsible for the ongoing maintenance of hedges and vegetation?"

"I work between Derby/Notts + London. HS2 + business development in Toton is greatly needed!"

1. Parking by HS2 station users must not overspill into neighbouring residential streets – as detailed in last bullet of para 3b.6. It is suggested that a 'residents only parking' system may be the solution to this issue. However, we need to ensure residents are not disadvantaged by any such scheme.
2. Viable green corridors on the site (especially the southern boundary) must be considered a mandatory requirement of any development proposals – as outlined in para 3b.7. This para needs to be strengthened to include a minimum width of the primary corridor to the southern boundary. The corridor to the northern boundary (south of Stapleford) is less important, given the likely creation of HS2 station access roads, so this can be treated as an 'informal greenspace' corridor.

Question 4. Modifications sought

[CTTC Forum text in: ***Black bold italic***]

Amend para 3b.6 to:**3b.6 Aspirations (*last bullet*):**

- Prevent overspill parking in existing residential areas when the station is operational. This may include Toton to become 'residents only parking' area to mitigate issues with Station/Tram traffic. ***Any such scheme needs to be implemented at zero cost to residents.***

Amend para 3b.7 to:**3b.7 Aspirations (*first bullet*):**

- Extensive multi-purpose interconnected Green Infrastructure routes to be provided to connect areas of growth and existing communities all of which should be of sufficient width and quality to provide attractive and usable links in the following locations:
 - Along the southern boundary of the location north of existing communities of Toton and Chilwell between Hobgoblin Wood in the east and Toton Fields Local Wildlife site in the west. **This will be a significant corridor in the area, and could incorporate both pedestrian and cycle access to HS2 station so needs to be 50 meters wide;**
 - Along the northern boundary of the location south of Stapleford. **This could comprise a narrow, graded tree and shrub roadside corridor to improve screening of the Innovation Village from the A52;**
 - Along the Erewash Canal ***and Erewash River (between Toton Washlands and Stapleford)*** to the west of the location (incorporating flood mitigation on the low lying Sidings part of the site);
 - Along the north/south corridor.....

Policy number	Page number	Policy text / Para number
17. Place-making, design and amenity	111	17.1 & 17.2

Question 2. What is the issue with the Local Plan?

Do you consider this paragraph or policy of the Local Plan to be:	Yes	No
2.1 Legally compliant		
2.2 Compliant with the duty to co-operate		
2.3 Sound		X

Question 3. Why is the Local Plan unsound?

If you think this paragraph or policy of the Plan is not sound, is this because:	
It is not justified	
It is not effective	X
It is not positively prepared	
It is not consistent with national policy	

Your Comments:

Residents' comments:

"Good broadband internet connections needed."

"Promote more walking/cycle ways (and fewer cars) in new developments"

1. Policy 17.1 would benefit by explicitly stating that provision of high speed broadband must be treated as a core utility in all new developments
2. Policy 17.2 would also be strengthened by a statement encouraging good design for walk ways and cycle ways to and through the site is included in the design and access statement

Question 4. Modifications sought

[CTTC Forum text in: ***Black bold italic***]

Amend Policies 17.1 & 17.2 to:

17.1 For all new development, permission will be granted for development which, where relevant:

...)

m) Enables convenient use by people with limited mobility, ***pedestrians & cyclists***; and

n) Incorporates ecologically sensitive design, ***including high speed broadband services***, with a high standard of planting and features for biodiversity; and

...)

17.2 Applicants for housing developments of 10 dwellings or more will be required to submit a design and access statement which includes an assessment of: ***a)*** the proposals against each of the 'Building for Life' criteria (see Appendix 5) ***and b) how the development promotes and encourages walking and cycling through the development.***

Policy number	Page number	Policy text / Para number
23. Proposals affecting designated and non-designated heritage assets	125	Para 23.1, 23.2, & 23.5

Question 2. What is the issue with the Local Plan?

Do you consider this paragraph or policy of the Local Plan to be:	Yes	No
2.1 Legally compliant		
2.2 Compliant with the duty to co-operate		
2.3 Sound		X

Question 3. Why is the Local Plan unsound?

If you think this paragraph or policy of the Plan is not sound, is this because:	
It is not justified	
It is not effective	X
It is not positively prepared	
It is not consistent with national policy	

Your Comments:

Resident's comment:

"Do not destroy NSFF building at Chilwell end of site. War memorial must be protected and given plenty of space. It means a lot to long term residents like me. 73yrs."

1. Chetwynd Barracks is due to be sold and redeveloped during the period of this Plan. The site has several valuable heritage assets – especially the memorial and associated garden area - to those who lost their lives during WW1, the shell factory explosion.
There are also other significant buildings – a WW1 Nurses Infirmary and the Officers Mess (part) - and there may be others. We need to ensure these assets are: a) formally identified and registered and; b) protected from any applications to develop the site in advance of any registration.
It is not clear who can apply to register these assets – does it need to be the site owner (MoD) or can the Forum apply?
2. There is a strong case to support the creation of a new Conservation Area within the Barracks site covering these buildings, memorial & gardens. The Forum will look to make such an application at the earliest possible time.

Question 4. Modifications sought

[CTTC Forum text in: ***Black bold italic***]

Amend para 23.1 to:

23.1 This policy applies to all heritage assets, including Listed Buildings, Conservation Areas, Scheduled Monuments ***and immediate associated areas (such as green spaces / gardens etc.)*** and non-designated assets of all kinds.

Amend para 23.2 to:

23.2 Heritage Statements should accompany all applications relating to heritage assets. ***Such a statement will be expected from an application to develop Chetwynd Barracks that will cover those heritage assets located on the site but which may not yet have been formally registered. On-site investigations of heritage assets (such as Hill Farm, on the Barracks), prior to any development starting, should be incorporated into statements. All statements*** ~~These~~ should clearly illustrate the nature of the proposals and their effect on the asset. They should refer to relevant sources of local information including [Conservation Area Appraisals](#), the 'Heritage Gateway', relevant literature and paintings, and the Heritage at Risk Register. Attention should be paid to the Borough's notable industrial heritage. Applications which are not directly related to heritage assets but could impact visually on their setting should include a proportionate Heritage Statement.

Amend para 23.5 to:

23.5 The Council will aim to produce Appraisals and Management Plans for all its Conservation Areas and will consider the merits of amendments to Conservation Area boundaries. It will also consider the production of a Local List of non-designated assets, criteria for their identification and/or an associated SPD. The Council will look to work pro-actively with established Civic Societies ***and Neighbourhood Forums*** to aid understanding of the local historic environment.

Policy number	Page number	Policy text / Para number
25. Culture, Tourism and Sport	152	Policy 1, 2 & para 25.1

Question 2. What is the issue with the Local Plan?

Do you consider this paragraph or policy of the Local Plan to be:	Yes	No
2.1 Legally compliant		
2.2 Compliant with the duty to co-operate		
2.3 Sound		X

Question 3. Why is the Local Plan unsound?

If you think this paragraph or policy of the Plan is not sound, is this because:	
It is not justified	
It is not effective	X
It is not positively prepared	
It is not consistent with national policy	

Your Comments:

Resident's comment:

"Provide astro turf facilities for all-year football"

1. There is a lack of all-weather artificial football pitches throughout the Borough but especially in the south. The Forum has opened discussions with the Notts FA to see how we might work together to develop pitches in the south of the Borough. It will help give a steer to developers if the Local Plan specifically referenced the need for more artificial pitches as well as turf pitches.
2. Chetwynd Barracks has a significant history and it should be recognised and used to enhance the tourism 'offering' in the Borough. By making specific reference to the site in this policy It will help to protect these heritage assets from future development.

Question 4. Modifications sought

[CTTC Forum text in: ***Black bold italic***]

Amend Policies 1 & 2 to:

Development proposals will be encouraged that;

1. Make specific provision for sports pitches, ***including artificial, all-weather '3G' pitches***, that are suitable for a wide age range of users, in particular children's sport.
2. Enhance the tourism offer in association with DH Lawrence, ***the legacy of Chetwynd Barracks (especially relating to the WWI shell factory and associated memorial)***, or the industrial/ pharmaceutical heritage of the Borough.

Amend para 25.1 to:

25.1 The adopted [Playing Pitch Strategy](#) identifies a deficiency in accessible and secured floodlit football turf ***and artificial, all-weather '3G'*** pitches to the Football Association accreditation standard within the Borough (mainly in the south)

Policy number	Page number	Policy text / Para number
26. Travel Plans	153	Para 26.1

Question 2. What is the issue with the Local Plan?

Do you consider this paragraph or policy of the Local Plan to be:	Yes	No
2.1 Legally compliant		
2.2 Compliant with the duty to co-operate		
2.3 Sound		X

Question 3. Why is the Local Plan unsound?

If you think this paragraph or policy of the Plan is not sound, is this because:	
It is not justified	
It is not effective	X
It is not positively prepared	
It is not consistent with national policy	

Your Comments:

Residents' comments:

"Traffic congestion now is bad. Stapleford lane is so congested could a relief road be put across the depot or around the back of it to ease the congestion on Stapleford Lane please"

"New feed Road into Depot from Bardills essential (with Tram/Bus/Cycle links?)"

"Promote more walking/cycle ways (and fewer cars) in new developments"

"Need regular bus route from Toton to Stapleford into the evenings"

1. The Forum will promote access to the HS2 Hub Station using walk ways, cycle ways and additional bus routes.
We would like to see a new, specific 'Justification' paragraph that states all Travel Plans must include a section on walk ways, cycle ways & and improved public transport (better bus routes; both frequency and extending services into the evenings)
2. Use section 106 money to improve pavements and cycle ways in local vicinity of developments. For instance, consider creating one-way streets in existing Toton streets bordering the HS2 station such as: Woodstock Road, Epsom Road etc. to allow space to create wider pavements & new cycle ways

Question 4. Modifications sought

[CTTC Forum text in: ***Black bold italic***]

Create new Justification para 26.2 to:

26.2 We expect Travel Plans to include specific sections detailing how developments will encourage more walking, cycling and public transport (bus routes both frequency and operating times) to / from and through the sites.

Policy number	Page number	Policy text / Para number
27. Local Green Space	155	Para 27.5

Question 2. What is the issue with the Local Plan?

Do you consider this paragraph or policy of the Local Plan to be:	Yes	No
2.1 Legally compliant		
2.2 Compliant with the duty to co-operate		
2.3 Sound		X

Question 3. Why is the Local Plan unsound?

If you think this paragraph or policy of the Plan is not sound, is this because:	
It is not justified	
It is not effective	X
It is not positively prepared	
It is not consistent with national policy	

Your Comments:

Residents' comments:

"Keep Hobgoblin wood"

"Keep trees on the west side of Barracks - from the quarry upwards"

1. The Forum intends to submit an application to designate Local Green Space during the development of its Neighbourhood Plan. It will be helpful for the Local Plan to acknowledge this intention so that developers are aware of the need to consult with the community & ensure they include a provision for Green Space in their plans.

Question 4. Modifications sought

[CTTC Forum text in: ***Black bold italic***]

Amend para 27.5 to:

27.5 Further areas of Local Green Space may be designated through forthcoming Neighbourhood Plans. ***We expect to receive an application to designate significant stretches of green infrastructure as Local Green Space within the Toton Strategic Growth Area and Chetwynd Barracks development sites.***

Policy number	Page number	Policy text / Para number
28. Green Infrastructure Assets	157	Policy 1.b & para 28.2

Question 2. What is the issue with the Local Plan?

Do you consider this paragraph or policy of the Local Plan to be:	Yes	No
2.1 Legally compliant		
2.2 Compliant with the duty to co-operate		
2.3 Sound		X

Question 3. Why is the Local Plan unsound?

If you think this paragraph or policy of the Plan is not sound, is this because:	
It is not justified	
It is not effective	X
It is not positively prepared	
It is not consistent with national policy	

Your Comments:

Residents' comments:

"Provide astro turf facilities for all-year football"

"Re-route Erewash Country trail & public footpath down the eastern edge of the Barracks site"

"Size of the depth of the "green corridor" to the south of the boundary and definitive information as to whether this corridor is STRICTLY for wildlife or inclusive of pedestrian access? Further, some categorical assurance as to who will be responsible for the ongoing maintenance of hedges and vegetation?"

1. Playing Pitches need to specifically include the growing trend for artificial, all-weather '3G' pitches
2. We would like to see new footpaths & cycle ways creating in green corridors inc. a re-routing of the Erewash Valley trail through Chetwynd Barracks.
3. We believe green corridors need to be of a decent, specified width to be consider viable. Otherwise developers will seek to minimise the widths of these corridors for their own purposes. The Notts WT has done research for the Forum on what is considered viable widths of green corridors. In summary:
 - *"corridors should be preserved, enhanced and provided, [.....], as they permit certain species to thrive where they otherwise would not. Corridors should be as wide and continuous as possible"* (Dawson, 1994):
 - 50m buffers [are] recommended for developments in the Local Plans of both Wakefield & Darlington Councils to protect local wildlife sites and / or river corridors etc.
 - A 50m width allows corridors to function as a 'multi-purpose network', as defined in NECR 180, so that it includes attributes that are valuable to people, i.e. biodiversity alongside amenity, footpaths, cycle ways, sustainable drainage, microclimate improvement, heritage etc.
 - Quadrat Scotland 2002 (Appendix 1). For connectedness, to be defined as 'high' (on scale high, medium, low), the corridor needs to be at least 50m wide for more than 50% of the corridor

References

Dawson, D. 1994. Are Habitat Corridors Conduits for Animals and Plants in a Fragmented Landscape? A Review of the Scientific Evidence. [English Nature Research Reports](#)
 Wakefield Consultation on spatial strategy: [Wakefield Council Spatial Policy Areas](#)
 Darlington consultation on draft housing allocations: [Darlington Council Housing Allocations report](#)
[Natural England Commissioned Report](#) NECR180 (2015) Econets, landscape & people: Integrating
 Quadrat Scotland (2002) The network of wildlife corridors and stepping stones of importance to the biodiversity of East Dunbartonshire. [Scottish Natural Heritage Commissioned Report](#)

Question 4. Modifications sought

[CTTC Forum text in: ***Black bold italic***]

Amend Policy 1b) to:

1. Development proposals which are likely to lead to increased use of any of the Green Infrastructure Assets listed below, as shown on the Policies Map, will be required to take reasonable opportunities to enhance the Green Infrastructure Asset(s). These Green Infrastructure Assets are:
 - a) Green Infrastructure Corridors (not shown on the Policies Map);
 - b) Playing Pitches, ***including artificial, all-weather '3G' Pitches;***
 - c) Informal.....

Amend para 28.2 to:

28.2 The corridors that are [.....]. The details of these opportunities for enhancement will depend on the characteristics of the corridors concerned. ***The Council believes corridors must be 50 metres wide to be considered beneficial and viable for wildlife.*** The corridors are detailed in section 6 of the GIS and are shown diagrammatically on the map on page 160 in this Plan. The corridors do not have fixed boundaries and the map on page 160 should not therefore be interpreted rigidly.

Amend para 28.5 to:

28.5 A potential continuation of the Nottingham Canal towpath [.....] should proposals for this emerge in the future. ***With the development of Chetwynd Barracks, the Council intends to exploit a new green corridor planned for the eastern side of the Barracks. It will re-route the Erewash Valley Trail down a new public footpath/cycleway through the corridor, and from there continue the Trail to the Attenborough Nature Centre.*** The Nature Reserves that are referred to in part 1f of the policy include Local Nature Reserves designated by the Council and Nature Reserves managed by Nottinghamshire County Council and Nottinghamshire Wildlife Trust.

Policy number	Page number	Policy text / Para number
32. Developer Contributions	171	Para 32.1

Question 2. What is the issue with the Local Plan?

Do you consider this paragraph or policy of the Local Plan to be:	Yes	No
2.1 Legally compliant		
2.2 Compliant with the duty to co-operate		
2.3 Sound		X

Question 3. Why is the Local Plan unsound?

If you think this paragraph or policy of the Plan is not sound, is this because:	
It is not justified	
It is not effective	X
It is not positively prepared	
It is not consistent with national policy	

Your Comments:

Residents' comments:

"Schools 3-18? What's the impact on existing LEA Primary schools?"

"If HS2 doesn't happen what funding is available to George Spencer to cover influx of children?"

1. Paragraph 32.1 would benefit by explicitly stating that Section 106 contributions are needed to increase capacity at all levels of education. Developers must acknowledge their obligations to increase provision at secondary schools as well as primary schools. This point is well made in the Infrastructure Delivery Plan (sections 4.51, 4.52, 4.55, pages 19, 20)
2. A new paragraph would be useful to explicitly state that all Section 106 contributions will be directed in the first instance to the Borough wards/town & parish councils affected by developments before other areas in the Borough are considered. This is because it cannot be right that other areas of the Borough benefit from developers' contributions before residents in the immediate vicinity are awarded suitable recompense for the changes to their environment.

Question 4. Modifications sought

[CTTC Forum text in: ***Black bold italic***]

Amend para 32.1 to:

32.1 This policy strikes the appropriate balance between ensuring the infrastructure requirements to make the development acceptable in planning terms are met, at the same time as not compromising the viability of developments. ***It is acknowledged that financial contributions are needed to increase provision of education capacity at secondary schools in key areas of the Borough***

New Justification para 32.2 to:

32.2 All Section 106 contributions will be directed in the first instance to the Borough wards/town & parish councils affected by developments before other areas in the Borough are considered

Question 5. Public Examination Attendance

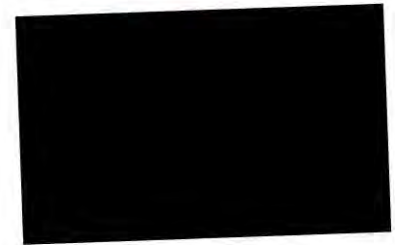
If your representation is seeking a modification, do you consider it necessary to participate at the public examination?	
Yes, I wish to participate at the public examination	Yes
No, I do not wish to participate at the public examination	

If you wish to participate at the public examination, please outline why you consider this to be necessary

- 1. The CTTC Forum would like the opportunity to explain in more detail the rationale for our suggested modifications to the Examiner. A specific concern relates to paragraph 28.2 and the need to explicitly commit to a specified width of green corridors necessary to assure viability of wildlife. However, we want the opportunity to explain our suggestions across all policies as appropriate.**



6882



3rd November 2017

Broxtowe Labour Group response to the Local Plan Part 2

Dear Steffan

I am writing in my capacity as Deputy Leader of the Labour Group in order to respond to the Local Plan Part 2 on behalf of the Labour Group of Councillors on Broxtowe Borough Council.

The Labour Group recognise the time, commitment and level of consultation that has gone into developing the current draft of the local plan, and we commend the officers involved on their efforts in relation to this important work.

The Local Plan Part 2 sets out the vision for Broxtowe for the next ten years, and during that time Broxtowe is likely to face significant changes, with demographic change, population growth and a fundamental shift in infrastructure with for example the advent of HS2. Broxtowe's residents are also likely to change the ways in which we live our lives, with the advent of new technologies and green energy. We believe that our Council must take a progressive and forward thinking approach to meeting those changes and challenges head on.

Broxtowe's Local Plan Part 2 must not only to be environmentally responsible, but also be environmentally progressive. Our commitment in Broxtowe is for 6150 homes by 2028 and when taken collectively, those homes have the ability to make a significant impact on the environment. We would therefore like to see additional commitments built into the plan in respect of new developments that ensure environmentally friendly housing development, which proactively encourages energy efficiency through the use of technologies such as solar panels, and ground source or air source heat pumps.

Over the next ten years, we have the opportunity to bring about significant change in Broxtowe in terms of becoming a proactively green borough. We believe that there are a number of adjustments to the local plan that may provide for this, including the introduction of electric charging points across the borough, a commitment to introduce a significant shift in the uptake of cycling by increasing the cycle paths available in the borough, and the allocation of land specifically for the creation of green energy - such as solar or wind energy. In addition, we recognise that fracking

2
has the potential to impact on significant swathes of Broxtowe over the next ten years. Whilst we note the key role that the County Council has to play in relation to fracking decisions, we believe that Broxtowe Borough should assert a commitment to a frack free Broxtowe in respect of the minerals policy in the Local Plan.

3.2
Green transport is also going to offer significant change in Broxtowe over the next ten years as we move towards preparing for the arrival of HS2 in Toton. We welcome HS2 and the opportunities that it will bring for jobs creation and local growth. A significant infrastructure project the size of HS2 offers an opportunity to put Broxtowe on the map, building an economic hub around the Toton Sidings station and the surrounding area. We are therefore strongly in favour of the provision for economic development and transport provision, including a Stapleford Gateway that promotes business growth in the corridor between Toton Sidings and Stapleford.

4
Further, outside of the immediate HS2 area, we are strongly supportive of the development of a freight terminal at Bennerley Washings in order to support jobs and growth in the North of the Borough as well as the South.

In addition to provision of green transport in respect of HS2, we have a clear commitment to the introduction of environmentally sound methods of transport in Broxtowe and the introduction of additional capacity to transport infrastructure in order to cope with population growth and changing demographics. We therefore advocate for a corridor of land reflecting the proposed tram route in Kimberley to be earmarked for the introduction of a new tram route in the North of the borough, joining Eastwood, Kimberley, Nuthall and Nottingham. We would also be supportive of additional bus infrastructure that joins the North and the South of the borough.

28
We believe that there should be put into place a green infrastructure corridor that extends from the HS2 site to Bramcote Woods, with a view towards creating a single extended green infrastructure corridor between the North and the South of the Borough. Such a corridor would be particularly valuable for nature preservation in terms of uninhibited movement of species. It would also provide a protected area for residents to enjoy and explore, thereby supporting our commitments to healthy lifestyles and green space preservation. Our green infrastructure sites should be enforceable in planning terms in order to secure their maximum impact.

15
In housing terms, we support a housing strategy which matches the demographic growth of Broxtowe and meets already existing shortfall in addition to those commitments required for future provision. The commitments to housing mix must be backed up by evidence drawn from housing waiting lists and population growth demographics. Faced with an aging population who are experiencing increasingly complex conditions, we would like to see strengthened commitments to the provision of dementia friendly housing and also supported living. In addition, we believe that there is a role for an increased development of Council owned social housing and we would like to see a specific commitment in the housing mix policy to this.

In terms of site allocations, whilst we broadly welcome the site allocations set out in the plan, we have some concerns that the density of development in the South of the borough will lead to significant pressures on both community and transport infrastructure and we believe this needs examining in some detail. In particular, we are concerned that there will be significant transport pressure placed on the A6005 that runs through Toton, Attenborough, Chilwell and Beeston and that capacity here will need to be considered. Likewise, we have some similar concerns surrounding the transport infrastructure capacity to support the proposed development in Awsworth in the North of the borough, and the access routes to the Chetwynd development in Chilwell in the South.

3.5
7 We strongly believe that housing should not be developed in isolation and we recognise a clear need for the provision of a wide variety of community infrastructure to support the proposed housing site allocations. This is particularly the case in the proposed developments in both Beeston Rylands, and the Chetwynd Barracks site in Chilwell, where planned developments are of a significant enough size to change the shape, dynamic and operation of the communities there. In these cases, we believe that there is a real need for the type of infrastructure that supports a community of significant size, such as shops, doctor's surgeries, green space, and places for the community to meet. In line with these principles, we also request that the 'Horse Field' in Beeston Rylands to the back of Cornwall Avenue not be included in the plan, and that Kettlebrook Lodge in Kimberley continues to be excluded from the plan in any revisions that may arise following this consultation. In addition, we would also stipulate that where community facilities do need to be moved in order to make way for proposed development, they are provided with a guaranteed site allocation and an enhanced facility to compensate the community for any loss.

3.4
3.1 We also believe that green spaces and green infrastructure have a clear role to play in any site allocation and therefore in particular reference to the site close to Bramcote Crematorium, consideration must be given to the preservation of a green corridor that runs between the North and the South of the borough. In addition, we recommend that provision be made for a network of footpaths running across the Chetwynd Barracks development.

11 Strategic development sites in the borough also offer the opportunity to bring about jobs and growth, and we welcome the commitment in the Local Plan Part 2 to develop Beeston town centre through the Phase 2 site. As part of this, we believe that there must be the clear provision of cultural and community space, including a clear expanse of public realm inclusive of a water feature similar in style to Nottingham market square. We believe that this space should extend between the current site and the church, including provision for the demolition of the current Argos block. Whilst we recognise that this development should be mixed use, we also believe that the formula for attracting homes in this critical development should

not be based on a short term gain of capital receipts. Instead, the strategy for redeveloping Beeston square should maximise economic rental revenue for the Council in future years.

10 In order to support jobs and growth in Broxtowe we believe there is a role for regeneration of all four of our town centres across the borough. We are supportive of the developments in Beeston town centre but we believe there is a role for growth in our towns also in Stapleford, Eastwood and Kimberley. We are therefore concerned at the assertion in the current version of the Local Plan Part 2 that our town centre boundaries will be constricted in order to potentially make way for new housing development at the edges of those town centres: we would advocate to keep the boundaries in their current state.

Our belief, as referenced in earlier in this response, is that housing should not be developed in isolation but in partnership with the community infrastructure already in existence, and reducing our town centre boundaries seems to go against this principle. Likewise, we believe that the current Broxtowe college site should not be sacrificed for more housing. Instead, it should be retained as a site for high quality education and training provision, or for employment provision if this is not possible. Likewise, we are aware of current plans to explore options for Beeston town hall: we believe that this community heritage asset offers more opportunity than the provision of housing, and has the potential to be used in creative ways to provide direct support for the members of community, looking towards examples of good practice such as Derby City Council's health and housing hub.

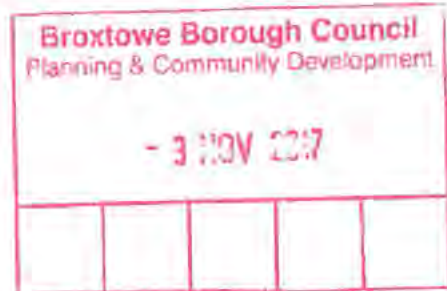
Ultimately, we believe that our Local Plan should offer the opportunity to become a forward thinking, progressive borough that is not only a centre for jobs and growth but also harnesses the opportunities of the future in terms of technological change, green energy and green transport. We believe that the policies in the Local Plan Part 2 and the respective allocation sites in Broxtowe should reflect this ambition, and should also reflect a core desire to develop not just housing, but also the communities that will live, work and thrive in those developments.

Yours sincerely,

Dawn Elliott
Deputy Leader of the Labour Group
On behalf of the Broxtowe Labour Group

Our ref: AP/lmd
3rd November 2017

Mr Steffan Saunders
Broxtowe Borough Council
Foster Avenue
Beeston
Nottingham
NG9 1AB



Dear Steffan

Draft Broxtowe Local Plan Part 2

On behalf of East Midlands Councils (EMC) I am making a representation in support of Policy 3.1 and 3.2 of the Draft Broxtowe Local Plan Part 2.

EMC is a voluntary partnership of the Borough, District, City and County councils from across the county areas of Derbyshire, Leicestershire, Lincolnshire, Nottinghamshire, Northamptonshire and Rutland.

This representation is based solely on the East Midlands HS2 Growth Strategy: World Class: Locally Led, which EMC published in September 2017 under the auspices of the East Midlands HS2 Strategic Board and the D2N2 LEP.

The Growth Strategy is a non-statutory document which has been produced with funding from the Department for Transport and informed by advice from the Government's Cities and Local Growth Team (a partnership of BEIS & DCLG) and the HS2 Growth Partnership (which includes HS2 Ltd and London & Continental Railways). Members and officers of Broxtowe Borough Council and Nottinghamshire County Council have been closely involved with the development of the Growth Strategy through the HS2 Strategic Board and its sub-groups.

The Growth Strategy sets out a long term vision for how the East Midlands can use HS2 to boost economic growth. Central to this vision is the establishment of a mixed use Innovation Campus adjacent to the proposed Hub Station at Toton. This proposal is consistent with the broad parameters for development set out in Policy 3.1 of the Part 2 Local Plan and the Part 1 Core Strategy – but clearly go into much greater spatial detail.

The Growth Strategy also advocates mixed use re-development of the Chetwynd Barracks site consistent with Policy 3.2 of the Part 2 Local Plan, which is described in the document as a 'Garden Village' development.

EMC will continue to work closely with Broxtowe Borough Council and other relevant authorities and bodies to take forward the further development and implementation of the Growth Strategy.

I would be happy to appear at the Examination in Public if that is considered to be helpful

Yours sincerely

[Redacted signature]

[Redacted name]

Director of Policy & Infrastructure, East Midlands Councils
Midlands Connect Project Team
East Midlands HS2 Executive Team



SWC/TC/HG0913

3 November 2017

Broxtowe Borough Council
Foster Avenue
Beeston
Nottingham
NG9 1AB

Dear Sir/Madam

PART 2 LOCAL PLAN: PUBLICATION CONSULTATION, SEPTEMBER 2017

WYG is instructed by Peveril Homes and UKPP (Toton) Limited in relation to land and planning matters on the area allocated for development at Toton.

Introduction

The site was identified as a Strategic Location for Growth in the Greater Nottingham Aligned Core Strategy (adopted September 2014), and now benefits, in part, from an outline planning consent (reference 12/00585/OUT) approved on 01 July 2016 for the following form of development:

"Outline planning application with points of access to be determined for a mixed-use development incorporating a maximum of 500 dwellings, 380 sqm convenience store, two 95 sqm retail outlets, education floor space (maximum 2,300 sqm), day nursery (maximum 450 sqm), pub/restaurant, an 80 bed residential care facility, open space, plot for medical surgery (0.04 hectares), plot for community use (0.08 hectares), highways, drainage, removal of electricity pylons and overhead cables, erection of terminal pylon, demolition of 316 Toton Lane and associated infrastructure."

A reserved matters application has subsequently been made for phase 1 of the site, in relation to the construction of 282 dwellings, including highway and drainage infrastructure and public open space (reference 17/00499/REM).

Policy 2 of the Core Strategy establishes the parameters for development of the whole site, and the extant outline consent and subsequent phase 1 reserved matters submission demonstrates a clear commitment for the scheme to be brought forward. Whilst Peveril/UKPP acknowledge that the Part 2 Local Plan policies should take forward the Core Strategy policy and comment on the Part 2 policies below, in legal terms the reserved matters submission must be compliant with the outline planning permission and conditions attached.





Local Plan Part 2

Policy 3.2 of the Publication Local Plan Part 2 relates to the strategic location for growth as identified by Policy 2 of the Aligned Core Strategy. However, as currently drafted, the policy does not fully reflect the requirements of the Aligned Core Strategy, and neither does it take account of the principles established by the extant outline planning permission.

The Core Strategy requires the strategic location for growth to deliver a minimum of 500 homes, alongside 18,000sqm of employment floor space, 16ha of green infrastructure and the safeguarding of land for both tram and vehicular access routes (from the A52) to the HS2 station site. With particular regard to the green infrastructure proposed, it is important to emphasise that the need identified for a **'buffer zone' on the southern side of the allocated site and a corridor running west to east should not** be regarded as a buffer zone (Policy 28) for amenity purposes. It should be regarded as a green corridor for public access to be available. Therefore, the extent of this corridor as shown on the **Council's indicative Master Plan** needs to be reconsidered. The corridor will be a functional green space that primarily provides an attractive but well observed, by natural surveillance, corridor from Toton Lane (and potentially Chetwynd barracks to the south east) to the HS2 Station Hub. That can be achieved in a lit corridor 10 metres wide.

The extant outline consent relates to the delivery of up to 500 houses, but on only part of the wider strategic location for growth. In contrast, Policy 3.2 of the Local Plan Part 2 refers only to the delivery of 500 homes within the plan period on the strategic location for growth as a whole, without mention of any additional housing required from the site either within or beyond the plan period. This is repeated in paragraph 3b.10 of the supporting text which provides the following aspiration for the site:

"500 housing units provided as part of a high quality mixed use development with a minimum net density of 40 dwelling per hectare."

The wording of Policy 3.2 is considered to be overly restrictive, as it will not realise the Core Strategy's objective of 500 homes being the minimum amount required at the strategic location for growth, nor provide the flexibility required for the long-term development of this important site. Ensuring the ability for further housing to be brought forward on land beyond that subject to the extant outline consent will maximise the benefits of development in this highly sustainable location, and reduce the extent to which further Green Belt release is required in other, less desirable locations. This is discussed further in relation to housing delivery matters below.

Policy 3.2 also seeks to introduce a minimum net density for 40 dwellings per hectare (dph) for the site. This is at odds with all other proposed housing sites set out in the Local Plan Part 2, none of which have a prescribed density set out in their respective policies. Rather, Policy 15: Housing Size, Mix and Choice requires all developments to provide ***"an appropriate mix of house size, type, tenure and density to ensure that the needs of the residents of all parts of the Borough are met"***. It is considered that this is the correct approach to be taken at Toton, and no site-specific density policy should be applied.

Such an approach would also ensure consistency with the extant outline consent for part of the site, which seeks to deliver housing at a net density of approximately 31dph. This principle was established by the indicative masterplan and the Design and Access Statement which accompanied the application, with an informative applied to the decision notice specifically to ensure that the design concept and principles from the Design and Access Statement are adhered to in any subsequent reserved matters



submission. Thus, more weight should be given to the density approved as part of the outline consent of 31 dph, and the policy requirement for a minimum net density of 40 dph should be removed.

Housing Delivery

As illustrated by the housing trajectory in Table 4 of the Local Plan Part 2 consultation document, housing delivery rates in the first 6 years of the plan period have provided only 50% of the housing requirement for Broxtowe Borough, representing a significant level of slippage against the delivery rates anticipated by the Core Strategy. In contrast, the revised trajectory included in the Local Plan Part 2 publication consultation document forecasts annual completions rising to over 1,000 units by the year 2020/21, against an average delivery rate of only 137 per annum in the plan period to date. This provides a clear rationale for the Local Plan Part 2 adopting as flexible an approach as possible to ensuring that deliverable housing sites are brought forward for development.

The sources of supply shown in Table 4 of the consultation document aggregate the sites together in broad locations, split between SHLAA sites and allocations, but without a detailed breakdown provided of the delivery rates anticipated from individual sites. There is no inclusion of the specific housing delivery rates anticipated at Toton and this should be corrected.

In more general terms – and reflecting the concerns expressed by the HBF – the housing trajectory that is included in Table 4 of the Part 2 Plan claims that the Council can achieve a land supply of 6,747 dwellings against an overall requirement to 2028 of 6,150 dwellings. This provides very little room for non-delivery of allocated and committed sites within the plan period, and does not take full account of the level of lapse rates which are typically seen for housing sites. **This means in Peveril/UKPP's view** that the Part 2 Plan does not allocated enough land for housing and should promote the quick release of allocations and existing commitments.

Even if delivery were to come forward as anticipated by the Council, it would still only provide the local planning authority with a supply of approximately 5.02 years for the period 2017-2022 (as reported to the Jobs and Economy Committee on 26 January 2017). This is a very marginal position with a surplus of only 11 dwellings/0.3%, which does not allow for any element of slippage or flexibility in the delivery of housing for the remainder of the plan period.

In light of the local authority's recent track record for delivery, and allowance for the level of delay and non-delivery typically seen for housing sites, it is clear that the approach currently proposed in the Local Plan Part 2 **does not provide a sufficiently robust position to ensure that the Borough's housing needs** can be met within the current plan period, or that a 5-year supply can be demonstrated upon adoption. Additional land must be identified for housing, and increasing the flexibility of the allocation at Toton will ensure that more housing can be delivered in this highly sustainable and deliverable location without a need for additional Green Belt release.

Masterplan and Proposed Uses

In addition to maintaining the established principle that 500 homes should be the minimum to be delivered from the wider site, the Local Plan Part 2 policy should ensure sufficient flexibility for a variety of uses to be brought forward across the strategic location for growth at Toton. As set out in **representations submitted on behalf of Peveril Securities Ltd to the Council's consultation** *Toton Consultation on Strategic Location for Growth in the Vicinity of the Proposed HS2 Station* (letter from



Signet Planning dated 23 November 2015), this should include the potential for the delivery of additional housing on land east of Toton Lane, alongside a wide variety of other uses across the site.

The range of uses should be extended to provide greater flexibility. Furthermore, the uses should be expressed with reference to the Use Classes Order.

If the Council restricts uses East of Toton Lane to Leisure/Education hub uses only, then it will not maximise the sustainable credentials of this site. The potential uses need to include:

1. A1, A2, A3, A4 and A5
2. B1 a) and b)
3. C1
4. C2
5. C3
6. D1
7. D2

This will enable this area to respond positively to the future needs of the locality with a minimum of 500 houses in the Strategic Location for Growth and 800 houses at Chetwynd Barracks.

The Council should also reassess the need for a wide green “corridor” along the southern boundary of the land East of Toton Lane; such a corridor is excessive in terms of its function, it fails to efficiently and effectively use non green belt land in a highly sustainable location and could make a comprehensive development unviable. The point of access is fixed by virtue of the consented development to the west of Toton Lane and the Master Plan, as proposed by the Council, would leave no development value to the south of its route.

Given the likely difficulties in meeting the housing requirement both for the plan period to 2028 and also the ongoing five-year land requirement, the maximum allocation should be made in the Toton area for more land for housing. In addition, there appears to be no justification as to why the Japanese Water Gardens adjacent to Bardills is not excluded from the Green Belt. The case for its exclusion in **accordance with paragraph 89 of the NPPF in Peveril’s view** clearly exists. With particular regard to the site boundary illustrated on Map 30, the red line should be extended on the northern boundary to encompass the land currently occupied by the Japanese Water Gardens. This area is contiguous with the adjacent land to the south and east, but is bound to the north by an existing belt of tall, mature trees. This existing physical feature together with the strong hedge line provide a more logical new Green Belt boundary, as required by paragraph 85 of the Framework, and will enable the comprehensive redevelopment of land which it is unnecessary to keep permanently open.

The Council should therefore re-think the approach to the development of the remainder of the Toton area with an emphasis more on housing provision (including land to the east of Toton Lane) and not including land in the Green Belt that does not fulfil the Green Belt purposes. In reconsidering the disposition of land uses with the emphasis on housing, it will be recalled that the OPUN design review of the masterplan was supportive of new housing being located close to the southern access into the Peveril/UKPP land. Thus Peveril/UKPP object to the approach being taken to the Toton site in the context of the overall Core Strategy objectives.

Given the timescales involved in the delivery of HS2 and the associated station at Toton, it is impossible at this early stage to know how the area will function in the longer term. Maximising flexibility is



therefore essential in ensuring the success of the strategic location for growth, whilst also ensuring that shorter-term needs can also be met.

I trust these representations are of assistance, and will be taken into account. If you have any queries or require any additional information then please do not hesitate to contact me.

Yours faithfully
for WYG Planning

[Redacted signature block]

[Redacted text block]

Planning Policy Team
Broxtowe Borough Council
Foster Avenue
Beeston
Nottingham
NG9 1AB

By Post & Email - policy@broxtowe.gov.uk

20809/A3/SN/ds

3rd November 2017

Dear Sir/Madam

PART 2 LOCAL PLAN 2017-2028 CONSULTATION – PUBLICATION VERSION – TOTON SIDINGS

On behalf of the Mr Sahota ('our Client') we write in response to the Broxtowe Borough Council Publication Version of the Part 2 Local Plan (which follows the Part 1 Local Plan, the Aligned Core Strategy). This document allocates specific sites to meet the development requirements set out in the Aligned Core Strategy and details further policies against which future planning applications will be assessed and is currently out for public consultation.

Our Client has interests in the land at Toton Sidings and residual land, as outlined by the plan that accompanies this representation. These representations are made wholly in respect of this land which, for the purpose of this representation, will be referred to as ('the Site').

1. The Soundness of the Plan

The National Planning Policy Framework ('the Framework'), in particular Paragraph 182, highlights that local planning authorities should submit a plan for examination which it considers is "*sound*"; namely that it is:

- **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

Our Client fully supports the mixed-use allocation.



2. General Comments

We have previously made representations throughout the Core Strategy, attended the various sessions at the Examination in Public and been involved with the working group.

Throughout all these stages our Client has supported the release of the land at Toton for development with or without the HS2 station. The land comprises previously developed land, has had significant technical work demonstrating the suitability of the Site and has successfully opposed a Town and Village Green application.

With or without the HS2 station the line is suitable and deliverable to be released from the Green Belt for development to take place. Our Client supports the allocation and the opportunity to provide development within the area.

The Core Strategy Allocation

Our Client's site has been included in the Core Strategy as a mixed-use site (Land in the Vicinity of the Proposed HS2 Station at Toton (Broxtowe)). The location of the HS2 hub has been included in the Core Strategy to deliver a strategic location for growth, comprising a minimum area of 73 hectares and set parameters of development, including:

- 500 homes;
- 18,000 square metres of employment land;
- 16 hectares of open space;
- Safeguarded land for the NET extension and vehicular access to the HS2 station;
- Local education provision; and
- Local retail provision.

3. Site Specific Representations

The remainder of this letter identifies and comments on specific elements of Part 2 of the Local Plan, with reference to Policy 3.2 Toton Strategic Location for Growth and the other land within our clients control, as shown on the accompanying plan to this representation.

TOTON SIDINGS MIXED USE ALLOCATION	
Ward	Toton and Chilwell Meadows Ward
Site Reference	Policy 3.2 Toton Strategic Location for Growth
Promoter of the Site	Tej Properties
Status in the Local Plan Part 2	Mixed Use Allocation
Policy 3: Main Built up Area Site Allocations	
Policy 3.2: Toton 500 Homes - Land in the vicinity of the HS2 Station at Toton (Strategic Location for Growth)	
Key Development Requirements within the Plan period:	
<ul style="list-style-type: none"> • 500 Homes of a minimum net density of 40 dwellings to the hectare and associated infrastructure to deliver this; and • Limited local retail provision of a scale that does not compete with the retail offer in nearby centres including Long Eaton, Stapleford and Sandiacre. 	

Key Development Requirements beyond the Plan period:

- The development of an innovation village comprising the following minimum and to be confirmed as part of the review of the Greater Nottingham Aligned Core Strategies:
- Minimum of 18,000 square metres of B class employment space towards the western side of the site around the hub station. This development will be provided as part of a mix of uses including tall buildings along the key north/south gateway between the HS2 Station and Stapleford; and
- Minimum of 16ha Open Space, to incorporate Green Infrastructure of sufficient width and quality to provide attractive and usable links between Hobgoblin Wood in the east and Toton Fields Local Wildlife Site in the west and the Erewash Canal, which will blend with a high quality built environment;
- An integrated local transport system that facilitates access enhancements to the station from the two gateway towns of Long Eaton to the south (in Erewash Borough) and Stapleford to the north;
- Safeguarded route for a NET tram extension and vehicular access to the HS2 station (including access from the A52);
- Tram extension to terminate at a level which facilitates the future tram extension beyond the station;
- An integrated traffic system that flows well including proper consideration of access both from Long Eaton and Stapleford; and
- Additional land for community facilities including education and the provision of a Leisure Centre (if required).

Our Client wholly supports the proposed allocation for mixed use development on this site and the wider area, however, it is considered that a full masterplan should be considered prior to exact details being identified. The whole area is required and provides a one-off opportunity for development and should not prejudice the ability to deliver on this important regional site.

Our Client's land abuts the proposed station and offers opportunities for development, whilst also owning nearby land in Erewash and land retained in the Green Belt, which could be enhanced for open space and biodiversity.

On this basis, our Client objects to any site specific requirements that may prejudice development of their site and reserves the right to comment later and be involved in any masterplanning exercises.

Policy 28 Green Infrastructure Assets

1. Development proposals which are likely to lead to increased use of any of the Green Infrastructure Assets listed below, as shown on the Policies Map, will be required to take reasonable opportunities to enhance the Green Infrastructure Asset(s). These Green Infrastructure Assets are:

- a) Green Infrastructure Corridors (not shown on the Policies Map);
- b) Playing Pitches;
- c) Informal Open Spaces i.e. 'natural and semi-natural green space' and 'amenity green space';
- d) Allotments; e) Recreational Routes; and
- f) Nature Reserves.

2. In all cases listed in part 1, and in the case of school playing fields, permission will not be granted for development that results in any harm to the Green Infrastructure Asset, unless the benefits of development are clearly shown to outweigh the harm.

In this case, the relevant parts of this policy are:

- 28b: Playing Pitches (Manor Farm Recreation ground)
- 28c: Informal Open Space (Manor Farm Recreation ground)
- 28f: Local nature Reserves (Toton Fields)

Our Client objects to the inclusion of land in the vicinity of the HS2 station being restricted via a policy at this time as opportunities for management and enhancement in accordance with a wider masterplan may be available.

Further to this the wording requires improvement of the asset itself, however, there may be opportunities for off-site improvements or contributions that could be made to other areas in lieu of onsite improvements. On this basis the policy should offer more flexibility to enable this to be discussed at any future planning application stage.

Policy 31.1a – Local Wildlife Sites: Toton Erewash Channel

1. Development proposals which are likely to lead to the increased use of any of the Biodiversity Assets listed below, as shown on the Policies Map, will be required to take reasonable opportunities to enhance the Asset(s). These Biodiversity Asset(s) are;

- a) Sites of Special Scientific Interest, Local Wildlife Sites or Local Geological Sites (as listed in Appendices 2, 3, 4 and shown on the Policies Map);

2. In all cases permission will not be granted for development that results in any harm to the Biodiversity Asset, unless the benefits of development are clearly shown to outweigh the harm.

Our Client objects to the inclusion of land in the vicinity of the HS2 station being restricted via a policy at this time as opportunities for management and enhancement in accordance with a wider masterplan may be available.

Whilst section 2 is welcomed, whereby benefits can be considered to outweigh any harm, again there may be opportunities for off-site improvements or contributions that could be made to other areas in lieu of onsite improvements. On this basis the policy should offer more flexibility to enable this to be discussed at any future planning application stage.

4. Green Belt Release

Our Client fully supports the Green Belt release for the site and acknowledges the exceptional circumstances that the Site fulfils that support the Site's release from the Green Belt.

The Council have an adopted Local Plan, which identifies the level of homes required over the plan period and identified that insufficient land existed outside of the Green Belt to deliver those homes. This, together with the needs of the district and the benefit of new homes, demonstrate the exceptional circumstances to release land from the Green Belt.

Furthermore, there are exceptional circumstances that are listed within the Site Selection Document, Main Report (September 2017) as follows:

- The Inspector into the ACS was content that the exceptional circumstances had been demonstrated as was the High Court Judge (Judge Jay) in ruling on the legal challenge into the ACS. There has been no change of circumstances since this time to justify a different view being taken.

In accordance with the Core Strategy, Amendments to the Green Belt will be undertaken as part of the Broxtowe's part 2 Local Plan to reflect the site's Green Belt release and this is supported.

5. Conclusions and Recommendations

These representations have been prepared on behalf of Mr Sahota and set out his comments in relation to the Broxtowe Borough Council Publication Version of the Part 2 Local Plan with a particular focus on the mixed-use allocation at Toton Sidings.

Our Client has a keen interest in the development of the Site and is grateful for this opportunity to engage in the forward planning process. They are committed to ensuring the latest emerging Local Plan is prepared on a sound and robust basis which meets the tests of paragraph 182 of the Framework.

It has been demonstrated throughout the emerging Allocations process that our Client's site is suitable, available, and achievable and is a deliverable site that should be allocated within the Part 2 of the local Plan. Our Client therefore supports the proposal to allocate the Site for mixed-use development but objects against the potential restrictions placed on the site in advance of a detailed masterplan and also policy requirements that do not offer flexibility and could prejudice delivery of parts of the strategic site.

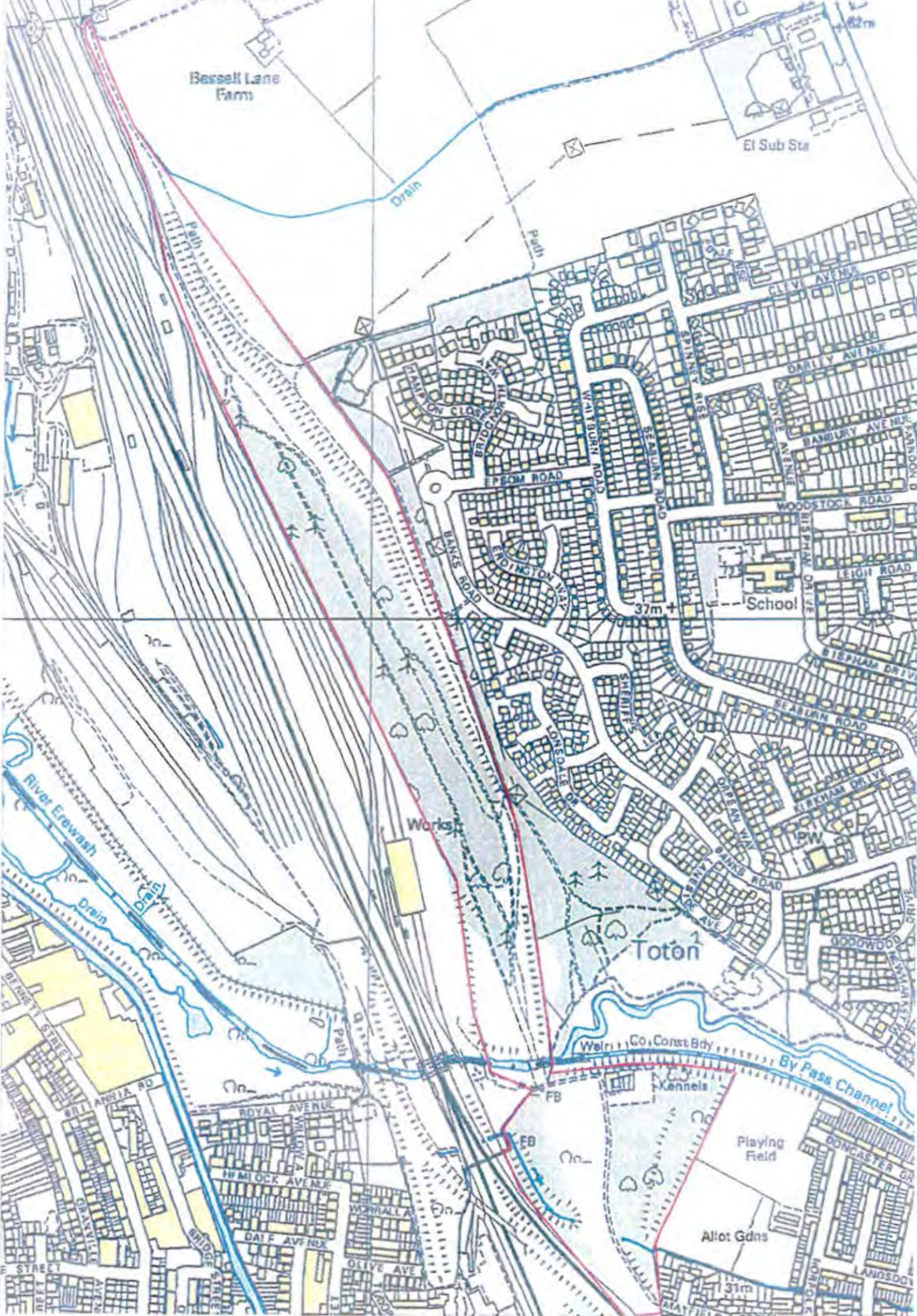
We trust the above information is of assistance to Broxtowe Borough Council in progressing with the emerging Part 2 of the Local Plan, but should you require any further information or have any queries in connection with this site then please do not hesitate to contact us.

Notwithstanding the above, our Client reserves the right to comment further at the EiP Hearing sessions.

Yours sincerely

A large black rectangular redaction box covering the signature and name of the sender.

Enc. Plan of the Site



BROXTOWE LOCAL PLAN PART 2: PUBLICATION VERSION

Representations by FEATHERSTONES

on behalf of Mrs D Viitanen

-
1. These representations have been prepared on behalf of Mrs D Viitanen who has land interest in the site at Gilt Hill Farm, Kimberley (see attached Plan). Mrs Viitanen has serious concerns about the soundness of the Plan, particularly in relation to the approach to housing delivery. These concerns are set out below.
 2. As presented the Broxtowe Plan is unsound because it fails to demonstrate how delivery of allocated sites will be guaranteed; it fails to incorporate sufficient flexibility to respond to any failure of delivery and it fails to provide a mechanism for the release of developable 'reserve sites' equivalent to 20% of the total housing requirement (as recommended by the Local Plans Expert Group in its Report to Government of March 2016).
 3. Additional housing sites, therefore, need to be identified in order to meet the NPPF's requirement to ensure the delivery of the minimum housing provision and also to ensure that there is an appropriate 5 year land supply in accordance with paragraph 47 of the Framework.
 4. Policy 2 of the Plan fails the challenge of housing supply. Table 4 confirms a significant housing supply short fall and a persistent history of under delivery.
 5. There is demonstrably no certainty of future housing delivery.
 6. The Plan relies on housing sites which have been allocated in previous Plans for up to (and beyond) 15 years. There are clearly strong reasons why these sites have not come forward. Sites include:
 - Beeston Maltings
 - Land at Awsworth with planning permission
 - Land at Eastwood with planning permission
 - Walker Street, Eastwood
 - Eastwood Road, Kimberley (x2).

Each of these sites were allocated in the 2004 Plan.

In addition, the allocation at Kimberley Depot is a refuse depot and tip, where inherent contamination could preclude or limit development.

7. Uncertainty of housing delivery also exists at strategic sites:
 - Boots
 - Severn Trent Sewage Treatment Works (contamination)
 - Chetwynd Barracks (no commitment to land release)
 - Toton/HS2 Hub (confused aspirations)
8. There are a range of sites and locations where additional, sustainable development can take place. Land at Gilt Hill Farm, Gilt Hill, Kimberley (identified on the Plan attached) is well related to the Kimberley Urban area, including local shops, employment and schools. It sits on

the edge of the settlement where there is no gap to distinguish it visually, physically or functionally from the urban area.

9. Releasing the site from the Green Belt and allocating it for housing development will provide the opportunity to improve the visual appearance of the site by replacing buildings in a poor condition with attractive and sustainable new buildings. It would remove a use that is non-conforming with adjacent residential and education land uses and provides an opportunity to introduce high quality landscaping and biodiversity features to ensure that the openness of the Green Belt is safeguarded. Crucially, the site is deliverable within the next five years so will help to off-set slow delivery on other sites, address immediate land supply issues and provide the certainty of delivery necessary to make the Plan sound.

Site Location Plan



Broxtowe Part 2 Local Plan



Broxtowe
Borough
COUNCIL

Agent

Please provide your client's name	Mrs D Viitanen
-----------------------------------	----------------

Your Details

Title	<input checked="" type="radio"/> Mr <input type="radio"/> Mrs <input type="radio"/> Miss <input type="radio"/> Ms <input type="text"/> Other:
Name	[REDACTED]
Organisation (if responding on behalf of the organisation)	Featherstones
Address	[REDACTED] [REDACTED] [REDACTED]
Postcode	[REDACTED]
Tel. Number	[REDACTED]
E-mail address	[REDACTED]

Comments should be received by 5.00pm on Friday 3rd November 2017

If you wish to comment on several policies, paragraphs, or sites, please use a separate form for each representation.

If you would like to be contacted by the Planning Policy Team regarding future consultations.

Please tick here ☒

Please help us save money and the environment by providing an e-mail address that correspondence can be sent to: [REDACTED]

For more information including an online response form please visit:

www.broxtowe.gov.uk/part2localplan

Data Protection - The comment(s) you submit on the Local Development Framework (LDF) will be used in the plan process and may be in use for the lifetime of the LDF in accordance with the Data Protection Act 1998. The information will be analysed and the Council will consider issues raised. Please note that comments cannot be treated as confidential and will be made available for public inspection. All representations can be viewed at the Council Offices.

Please return completed forms to:

Planning Policy, Legal and Planning Services, Foster Avenue, Beeston, Nottingham NG9 1AB

For more information: Tel: 0115 917 3452, 3448, 3468 or 3015 E-mail: policy@broxtowe.gov.uk

Question 1: What does your comment relate to? Please specify exactly

Document	Policy number	Page number	Policy text/ Paragraph number
Part 2 Local Plan	Policy 1: Flood Risk		
	Policy 2: Site Allocations		Policy 2
	Policy 3: Main Built up Area Site Allocations		Policy 3
	Policy 4: Awsworth Site Allocation		Policy 4
	Policy 5: Brinsley Site Allocation		Policy 5
	Policy 6: Eastwood Site Allocation		Policy 6
	Policy 7: Kimberley Site Allocations		Policy 7
	Policy 8: Development in the Green Belt		
	Policy 9: Retention of good quality existing employment sites		
	Policy 10: Town Centre and District Centre Uses		
	Policy 11: The Square, Beeston		
	Policy 12: Edge-of-Centre A1 Retail in Eastwood		
	Policy 13: Proposals for main town centre uses in edge-of-centre and out-of-centre locations		
	Policy 14: Centre of Neighbourhood Importance (Chilwell Road / High Road)		
	Policy 15: Housing size, mix and choice		
	Policy 16: Gypsies and Travellers		
	Policy 17: Place-making, design and amenity		
	Policy 18: Shopfronts, signage and security measures		
	Policy 19: Pollution, Hazardous Substances and Ground Conditions		
	Policy 20: Air Quality		
	Policy 21: Unstable land		
	Policy 22: Minerals		
	Policy 23: Proposals affecting designated and non-designated heritage assets		
	Policy 24: The health impacts of development		
	Policy 25: Culture, Tourism and Sport		
	Policy 26: Travel Plans		
	Policy 27: Local Green Space		
	Policy 28: Green Infrastructure Assets		
	Policy 29: Cemetery Extensions		
	Policy 30: Landscape		
	Policy 31: Biodiversity Assets		
	Policy 32: Developer Contributions		
Policies Map			
Sustainability Appraisal			
Other (e.g. omission, evidence document etc.)	Yes, exclusion of sites.		

Question 2: What is the issue with the Local Plan?

Do you consider this paragraph or policy of the Local Plan to be: <i>(please refer to the guidance note at for an explanation of these terms)</i>		Yes	No
2.1	Legally compliant		
2.2	Compliant with the duty to co-operate		
2.3	Sound		✓

Question 3: Why is the Local Plan unsound? Please only answer this question if you answered 'No' to 2.3 above

If you think this paragraph or policy of the Plan is not sound, is this because:	
It is not justified	✓
It is not effective	✓
It is not positively prepared	✓
It is not consistent with national policy	✓

Your comments

Please give details of why you consider this part of the Local Plan is not legally compliant, is unsound or does not comply with the duty to co-operate. Alternatively, if you wish to support any of these aspects please provide details. Please be as precise as possible. Continue on an extra sheet if necessary.

See attached Statement

Question 4: Modifications sought

Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. Continue on an extra sheet if necessary.

See attached Statement

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Question 5: Public Examination Attendance

If your representation is seeking a modification, do you consider it necessary to participate at the public examination?

Yes, I wish to participate at the public examination

✓

No, I do not wish to participate at the public examination

If you wish to participate at the public examination, please outline why you consider this to be necessary

We wish to participate at public examination to explore fully the concerns we have with the soundness of the Plan.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the public examination.

BROXTOWE LOCAL PLAN PART 2: PUBLICATION VERSION

Representations by FEATHERSTONES

on behalf of Mrs M Barnes

-
1. These representations have been prepared on behalf of Mrs M Barnes who has land interest in the site at Land off Back Lane, Nuthall (see attached Plan). Mrs Barnes has serious concerns about the soundness of the Plan, particularly in relation to the approach to housing delivery. These concerns are set out below.
 2. As presented the Broxtowe Plan is unsound because it fails to demonstrate how delivery of allocated sites will be guaranteed; it fails to incorporate sufficient flexibility to respond to any failure of delivery and it fails to provide a mechanism for the release of developable 'reserve sites' equivalent to 20% of the total housing requirement (as recommended by the Local Plans Expert Group in its Report to Government of March 2016).
 3. Additional housing sites, therefore, need to be identified in order to meet the NPPF's requirement to ensure the delivery of the minimum housing provision and also to ensure that there is an appropriate 5 year land supply in accordance with paragraph 47 of the Framework.
 4. Policy 2 of the Plan fails the challenge of housing supply. Table 4 confirms a significant housing supply short fall and a persistent history of under delivery.
 5. There is demonstrably no certainty of future housing delivery.
 6. The Plan relies on housing sites which have been allocated in previous Plans for up to (and beyond) 15 years. There are clearly strong reasons why these sites have not come forward. Sites include:

- Beeston Maltings
- Land at Awsworth with planning permission
- Land at Eastwood with planning permission
- Walker Street, Eastwood
- Eastwood Road, Kimberley (x2).

Each of these sites were allocated in the 2004 Plan.

In addition, the allocation at Kimberley Depot is a refuse depot and tip, where inherent contamination could preclude or limit development.

7. Uncertainty of housing delivery also exists at strategic sites:
 - Boots
 - Severn Trent Sewage Treatment Works (contamination)
 - Chetwynd Barracks (no commitment to land release)
 - Toton/HS2 Hub (confused aspirations)
8. There are a range of sites and locations where additional, sustainable development can take place. Land off Back Lane, Nuthall (identified on the Site Plan attached) is currently used for equestrian purposes with stables, livery and associated activity together with residential property. The site is within the defined Green Belt, however this designation no longer

satisfies the purpose or function of Green Belt land as defined within Paragraph 80 of the NPPF.

9. The removal of the Back Lane site from the Green Belt would facilitate the redevelopment of the site for up to 40 new dwellings as well as delivering improved screening and buffering from the M1 motorway to the wider benefit of existing residents.
10. Housing development on this site would assist in providing additional flexibility regarding the delivery of new housing in the Borough, helping to off-set slow delivery rates on other sites. The site is in single ownership where the intention is to progress towards a planning application as soon as possible and to bring the site to the housing market at the earliest opportunity.

Site Location Plan – Land off Back Lane, Nuthall



Broxtowe Part 2 Local Plan



Broxtowe
Borough
COUNCIL

Agent

Please provide your client's name	Mrs Marjorie Barnes
-----------------------------------	---------------------

Your Details

Title	<input checked="" type="radio"/> Mr <input type="radio"/> Mrs <input type="radio"/> Miss <input type="radio"/> Ms <input type="text"/> Other:
Name	[REDACTED]
Organisation (if responding on behalf of the organisation)	Featherstones
Address	[REDACTED] [REDACTED] [REDACTED]
Postcode	[REDACTED]
Tel. Number	[REDACTED]
E-mail address	[REDACTED]

Comments should be received by 5.00pm on Friday 3rd November 2017

If you wish to comment on several policies, paragraphs, or sites, please use a separate form for each representation.

If you would like to be contacted by the Planning Policy Team regarding future consultations.

Please tick here ☒

Please help us save money and the environment by providing an e-mail address that correspondence can be sent to: [REDACTED]

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	Policy 31: Biodiversity Assets		
	Policy 32: Developer Contributions		
Policies Map			
Sustainability Appraisal			
Other (e.g. omission, evidence document etc.)	Yes, exclusion of sites.		

Question 2: What is the issue with the Local Plan?

Do you consider this paragraph or policy of the Local Plan to be: <i>(please refer to the guidance note at for an explanation of these terms)</i>		Yes	No
2.1	Legally compliant		
2.2	Compliant with the duty to co-operate		
2.3	Sound		✓

Question 3: Why is the Local Plan unsound? Please only answer this question if you answered 'No' to 2.3 above

If you think this paragraph or policy of the Plan is not sound, is this because:	
It is not justified	✓
It is not effective	✓
It is not positively prepared	✓
It is not consistent with national policy	✓

Your comments

Please give details of why you consider this part of the Local Plan is not legally compliant, is unsound or does not comply with the duty to co-operate. Alternatively, if you wish to support any of these aspects please provide details. Please be as precise as possible. Continue on an extra sheet if necessary.

See attached Statement

Question 4: Modifications sought

Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. Continue on an extra sheet if necessary.

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Question 5: Public Examination Attendance

If your representation is seeking a modification, do you consider it necessary to participate at the public examination?

Yes, I wish to participate at the public examination

✓

No, I do not wish to participate at the public examination

If you wish to participate at the public examination, please outline why you consider this to be necessary

We wish to participate at public examination to explore fully the concerns we have with the soundness of the Plan.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the public examination.

BROXTOWE LOCAL PLAN PART 2: PUBLICATION VERSION

Representations by FEATHERSTONES on behalf of RICHARD TAYLOR

1. This submission is made on behalf of Richard Taylor, who is the owner of land identified on the attached plan 1. Part of that land (plan 2) we contend, is suitable for housing development.
2. As presented the Broxtowe Plan is unsound because it fails to demonstrate how delivery of allocated sites will be guaranteed; it fails to incorporate sufficient flexibility to respond to any failure of delivery and it fails to provide a mechanism for the release of developable 'reserve sites' equivalent to 20% of the total housing requirement (as recommended by the Local Plans Expert Group in its Report to Government of March 2016).
3. Additional housing sites, therefore, need to be identified in order to meet the NPPF's requirement to ensure the delivery of the minimum housing provision and to ensure that there is an appropriate 5 year land supply in accordance with paragraph 47 of the Framework.
4. Policy 2 of the Plan fails the challenge of housing supply. Table 4 confirms a significant housing supply short fall and a persistent history of under delivery.
5. There is demonstrably no certainty of future housing delivery.
6. The Plan relies on housing sites which have been allocated in previous Plans for up to (and beyond) 15 years. There are clearly strong reasons why these sites have not come forward. Sites include:
 - Beeston Maltings
 - Land at Awsorth with planning permission
 - Land at Eastwood with planning permission
 - Walker Street, Eastwood
 - Eastwood Road, Kimberley (x2).

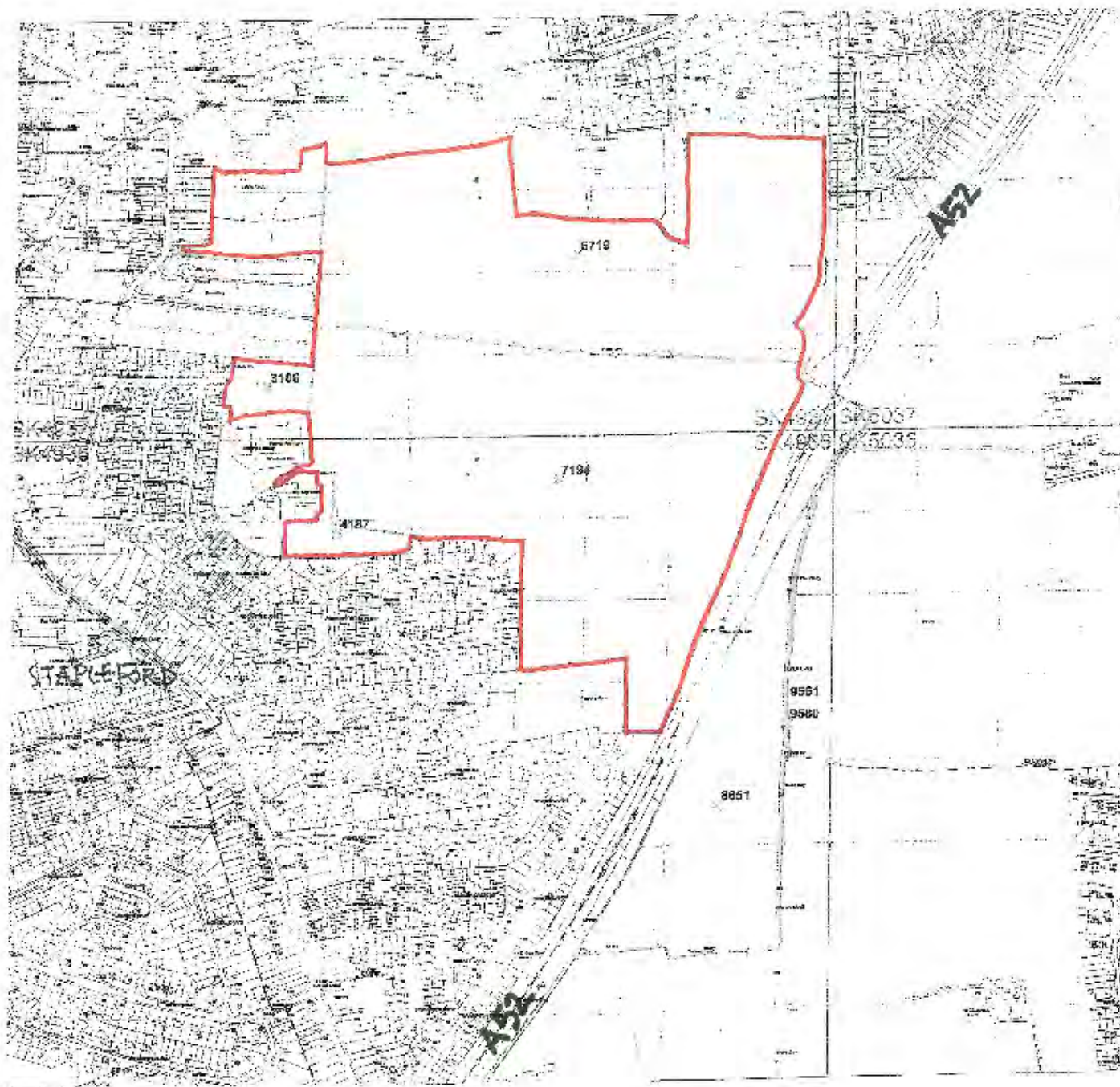
Each of these sites were allocated in the 2004 Plan.

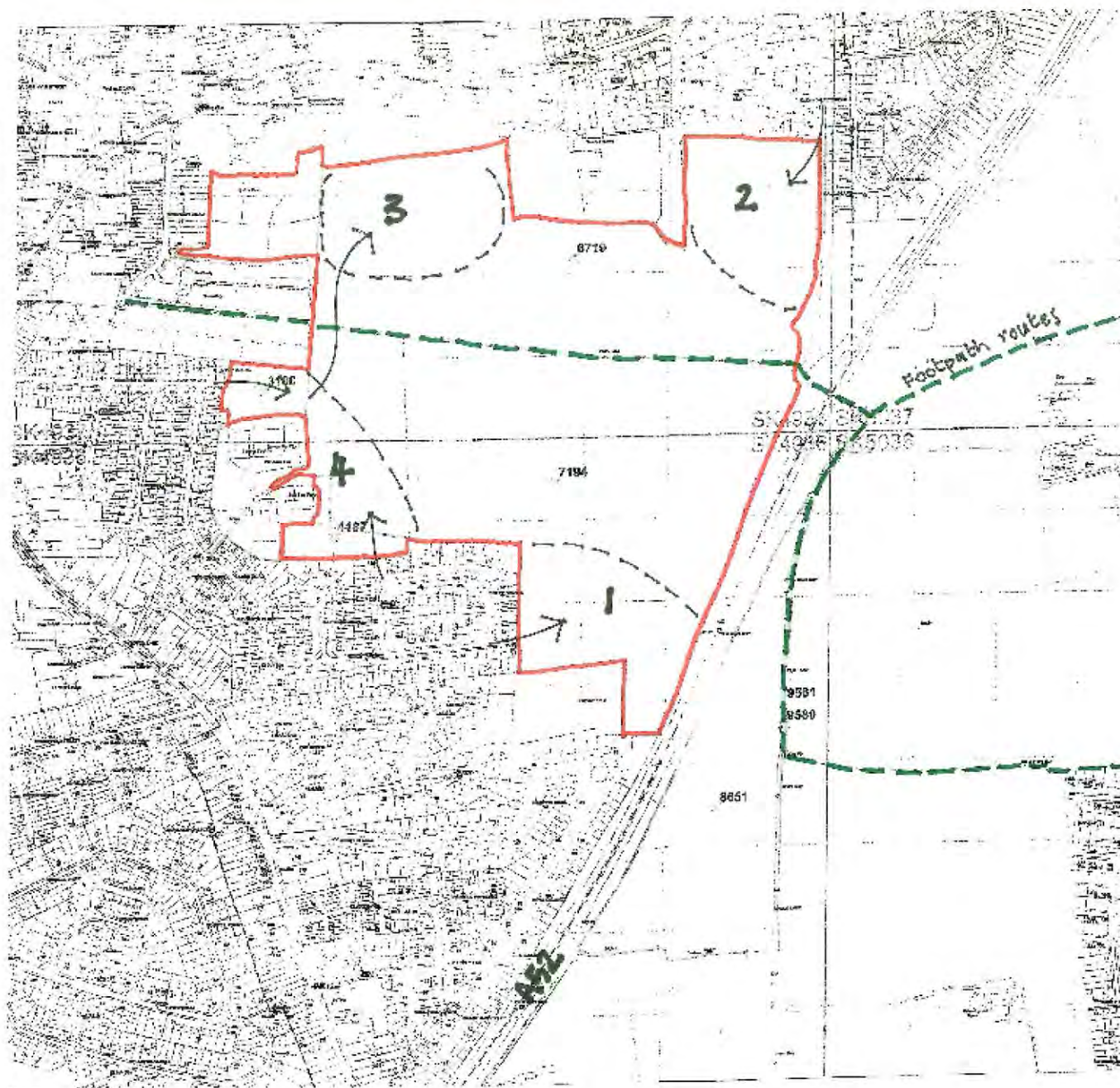
In addition, the allocation at Kimberley Depot is a refuse depot and tip, where inherent contamination could preclude or limit development.

7. Uncertainty of housing delivery also exists at strategic sites:
 - Boots
 - Severn Trent Sewage Treatment Works (contamination)
 - Chetwynd Barracks (no commitment to land release)
 - Toton/HS2 Hub (confused aspirations)
8. In order to help to minimise the (likely) continued non-delivery of sites for housing, additional land should be identified (for housing) in the plan; specifically, land at Stapleford, as identified on plan 2. Four parcels of land here could be developed for housing without adversely impacting on land important to the visual significance of Windmill Hill (part of the Bramcote Ridge). Similarly, the role of that Ridge as a public footpath would not be threatened, long distance views would be maintained, landscaping would be enhanced and properly managed.
9. In turn, the four parcels could accommodate:
 - Sisley Avenue - 80 dwellings
 - Baulk Lane - 75 dwellings

-
- North West Hill Top - 80 dwellings
 - Hill Top Farm - 30 dwellings
10. Consequently, it is estimated that (about) 265 new dwellings could be delivered on the site. This would be in a manner which would acknowledge, respect and enhance the context and the wider environment.
 11. The land is in one ownership. There are no technical, access or commercial impediments to immediate delivery and the allocation would help the Plan to achieve soundness.

PLAN I OWNERSHIP





PLAN 2 OPPORTUNITY

1. SISLEY AVENUE
2. BAULK LANE
3. NORTH WEST HILL TOP
4. HILL TOP FARM



Broxtowe Part 2 Local Plan



Broxtowe
Borough
COUNCIL

Agent

Please provide your client's name	Richard Taylor
-----------------------------------	----------------

Your Details

Title	<input checked="" type="radio"/> Mr <input type="radio"/> Mrs <input type="radio"/> Miss <input type="radio"/> Ms <input type="text"/> Other:
Name	[REDACTED]
Organisation (if responding on behalf of the organisation)	Featherstones
Address	[REDACTED] [REDACTED] [REDACTED]
Postcode	[REDACTED]
Tel. Number	[REDACTED]
E-mail address	[REDACTED]

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Other (e.g. omission, evidence document etc.)	Yes, exclusion of sites.		

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Do you consider this paragraph or policy of the Local Plan to be: <i>(please refer to the guidance note at for an explanation of these terms)</i>		Yes	No
2.1	Legally compliant		
2.2	Compliant with the duty to co-operate		
2.3	Sound		✓

Question 3: Why is the Local Plan unsound? Please only answer this question if you answered 'No' to 2.3 above

If you think this paragraph or policy of the Plan is not sound, is this because:	
It is not justified	✓
It is not effective	✓
It is not positively prepared	✓
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Your comments

Please give details of why you consider this part of the Local Plan is not legally compliant, is unsound or does not comply with the duty to co-operate. Alternatively, if you wish to support any of these aspects please provide details. Please be as precise as possible. Continue on an extra sheet if necessary.

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If your representation is seeking a modification, do you consider it necessary to participate at the public examination?

Yes, I wish to participate at the public examination

✓

No, I do not wish to participate at the public examination

If you wish to participate at the public examination, please outline why you consider this to be necessary

We wish to participate at public examination to explore fully the concerns we have with the soundness of the Plan.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the public examination.

**BROXTOWE LOCAL PLAN PART 2:
PUBLICATION VERSION**

**Representations by OXALIS PLANNING on behalf of
W.WESTERMAN LTD**

-
- 1.1 These representations have been prepared on behalf of W. Westerman Ltd who have a number of land interests in Broxtowe. W. Westerman Ltd have serious concerns about the soundness of the Plan, particularly in relation to the approach to housing delivery. These concerns are set out below.
- 1.2 The NPPF requires Local Planning Authorities to plan positively to ensure the delivery of the area's 'minimum' housing requirements and to ensure that there is an appropriate 5 year land supply in accordance with paragraph 47 of the NPPF.
- 1.3 It is unclear from Policy 2 of the proposed Plan how the Government's requirements regarding housing delivery will be met. It can be seen from the Housing Trajectory at Table 4 of the Plan that Broxtowe has a significant housing supply shortfall and a persistent history of under delivery. Within this context it is essential that the Council are able to provide certainty regarding the delivery of housing. For the reasons set out below it is considered that the Plan fails to do this and is therefore unsound.
- 1.4 The need for flexibility or the identification of 'reserve sites' is not unusual but is particularly pertinent to Broxtowe because of its historical under performance, the number of sites carried forward from the 2004 Local Plan and the uncertainty regarding the key strategic sites. It is W.Westerman's view that a number of the sites proposed to be allocated by the Council will fail to be delivered and others are likely to be delayed such that the numbers assumed to be delivered will not be met. Individually a number of sites should not be counted towards delivery targets given their uncertainty. However the collective impact of so many complex and uncertain sites must also be addressed through the allocation of additional land.
- 1.5 In terms of strategic sites this uncertainty includes:
- a. Land at Boots, which although the site has permission continues to be complex with significant delivery uncertainties.
 - b. Severn Trent land which is a former sewage treatment works with associated complexities of decontamination and remediation. Housing delivery on the site is therefore highly uncertain.
 - c. Chetwynd Barracks: A current and active Ministry of Defence site. Whilst the MOD have indicated that the site may become available for redevelopment, no firm committed dates are set out and the timing of any closure is subject to change. There remains a potential for a significant delay to the closure of the site or a cancellation. Delivery is highly uncertain therefore.
 - d. Toton: Whilst planning permission exists on part of this site, that permission conflicts with the vision for the site as set out in Policy 3.2. The supporting text to this Policy is confusing and ill-conceived. It is based largely on the East Midlands HS2 Growth Strategy Document published in September 2017. It includes the statement in relation to the vision for the Toton that

'It will also require higher densities than those currently subject of an extant Outline Planning Consent for the site and this will need careful consideration by Broxtowe Borough Council as the Local Planning Authority.' (Page 20).
- Whilst this implies the potential for greater housing numbers in the long term it brings onto question the deliverability of the extant consent and housing delivery in the short to medium term.

1.6 In terms of other allocations or 'committed' sites:

- a. Land at Beeston Maltings – Policy 3.6, has been allocated since 2004. It remains a difficult and complex site and delivery is highly uncertain.
- b. Land in Aysworth includes land allocated since 2004 and although there is extant permission, delivery is not certain.
- c. Two sites in Eastwood were allocated in the 2004 Local Plan and delivery remains uncertain notwithstanding extant planning permission.
- d. Land at Walker Street, Eastwood – Policy 6.1. This forms part of a school and recreation facility. Aside from its individual merits as an allocation, the site has been allocated (although a different part of the overall school site) since 2004 with no development progressing. Given the status of the site and wider uncertainty regarding school places and the quality and quantity of sports and recreation space, the delivery of the site is highly uncertain.
- e. Land south of Kimberley including Kimberley Depot - Policy 7.1. The site is currently a refuse depot with refuse tip. It is unclear if new facilities have been found to facilitate relocation. Notwithstanding, the site will contain areas of contamination which could preclude or limit development. Delivery on the site is therefore uncertain.
- f. Land South of Eastwood Road, Kimberley – Policy 7.2. This site has been allocated since 2004. Development of the site remains complex and delivery highly uncertain.
- g. Builders Yard, Eastwood Road, Kimberley – Policy 7.3. This site has been allocated since 2004. Development on the site remains uncertain.

1.7 The uncertainty in Broxtowe stems principally from the sheer number of complex sites where the level of certainty regarding delivery is extremely low. In these circumstances there is not a sufficiently reasonable prospect that the minimum housing numbers will be achieved and the Plan is therefore unsound. The circumstances in Broxtowe are the very circumstances that have led the Local Plan Experts Group to recommend the introduction of appropriate lapse rates and a 20% reserve site allowance. To adopt the Plan in its current form would perpetuate the current and historic role the planning system has played in creating a crisis in housing through the lack of delivery of new homes.

1.8 The Government recognises that more needs to be done to ensure that the right numbers of houses are built. It's White Paper – Fixing Our Broken Housing Market (February 2017) is aimed at just that. The White Paper draws on and makes reference to the work undertaken by the Local Plan Experts Group (LPEG). As well as proposing a new approach to calculating housing needs, the LPEG made recommendations as to how Local Plans should be approached not only to demonstrate a five year land supply but to ensure plans deliver over the whole plan period.

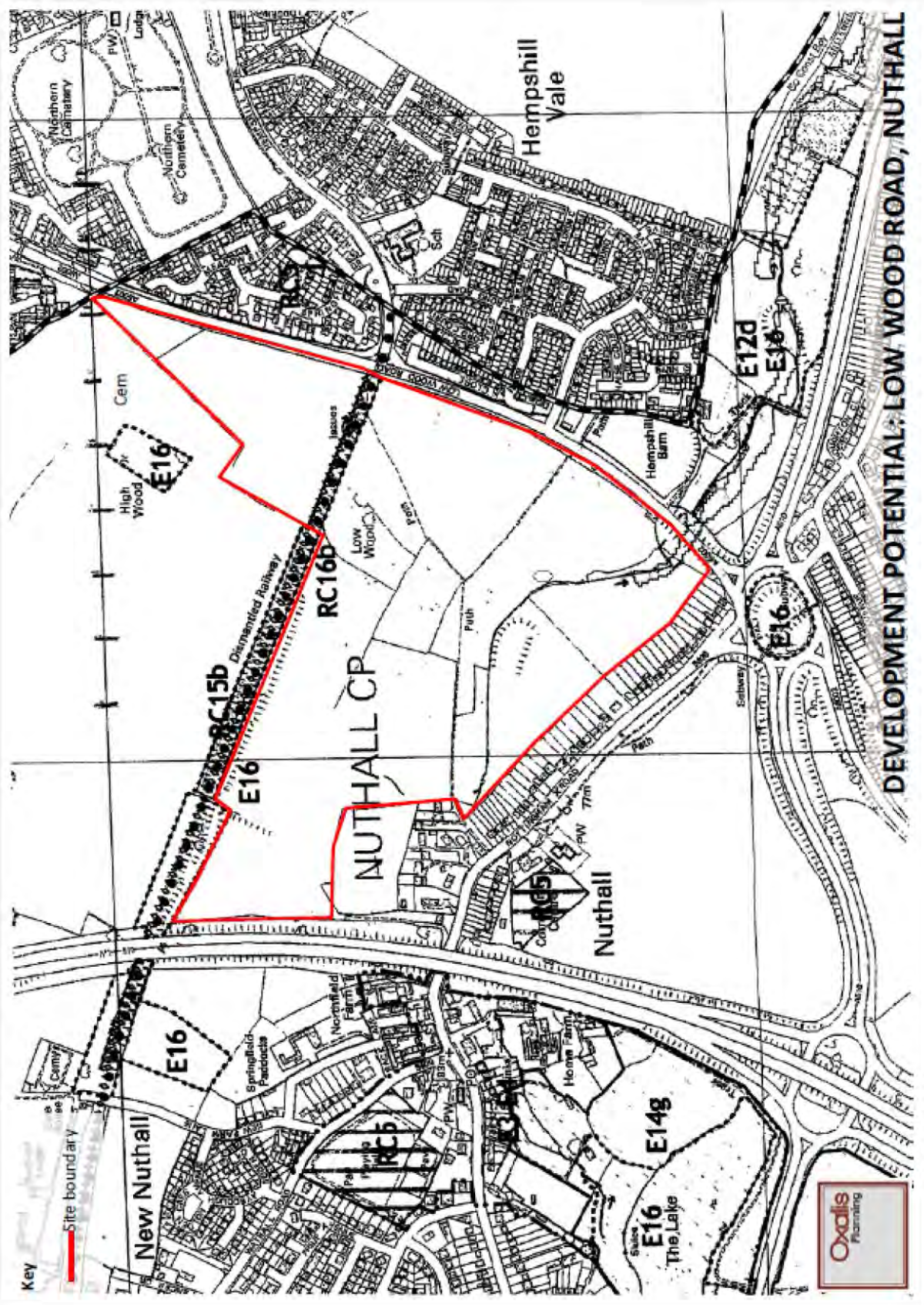
1.9 In their Report to Government (March 2016) the LPEG state that:

'there needs to be a clearer and more effective mechanism for maintaining a five year land supply, at the same time as ensuring plans consider delivery over the whole plan period and incorporate sufficient flexibility to respond to rapid change' (Paragraph 11.3).

And they recommend that plans:

'focus on ensuring a more effective supply of developable land for the medium to long term (over the whole plan period), plus make provision for, and provide a mechanism for the release of, developable Reserve Sites equivalent to 20% of their housing requirement' (Paragraph 11.4).

-
- 1.10 Because of its existing delivery problems, the scale of its shortfall and the uncertainties regarding delivery in the future, it is important that this 'sufficient Flexibility' is adopted by Broxtowe in its Local Plan Part 2. The Local Plan must be flexible enough to guarantee the delivery of the minimum number of new homes in the Plan period.
- 1.11 In simple terms this means planning for more houses so that there is sufficient flexibility now, to take account of inevitable delays to delivery on some sites and lapsed permission or non-implementation on others.
- 1.12 Furthermore in terms of a 5 year land supply the Plan does not set out how an appropriate land supply should be calculated and how this will then be met by the Plan. It is essential that the Plan, or supporting evidence, contains appropriate information to confirm that the Plan provides a 5 year land supply calculation from adoption of the Plan. The Plan will be unsound unless it can be demonstrated, based on appropriate assumptions, that it will bring about a 5 year land supply position.
- 1.13 There are a range of sites and locations where additional, sustainable development can take place. Land at Low Wood Road, Nuthall (identified on the Plan attached) is well related to the Urban area and extremely well related to the transport network, including the Tram. There is potential for the Tram to be extended into the site and for new and improved park and ride facilities to be provided, helping to address existing congestion and capacity issues. As a minimum it is considered that the site should be removed from the Green Belt so that it is available for development in the longer term or if delivery on other identified sites stall.



Broxtowe Part 2 Local Plan



Broxtowe
Borough
COUNCIL

Agent

Please provide your client's name	W.WESTERMAN
-----------------------------------	-------------

Your Details

Title	<input checked="" type="radio"/> Mr <input type="radio"/> Mrs <input type="radio"/> Miss <input type="radio"/> Ms <input type="radio"/> Other:
Name	[REDACTED]
Organisation (if responding on behalf of the organisation)	Oxalis Planning Ltd
Address	[REDACTED] [REDACTED] [REDACTED]
Postcode	[REDACTED]
Tel. Number	[REDACTED]
E-mail address	[REDACTED]

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Please tick here ☒

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Other (e.g. omission, evidence document etc.)	Yes, exclusion of sites.		

Question 2: What is the issue with the Local Plan?

Do you consider this paragraph or policy of the Local Plan to be: <i>(please refer to the guidance note at for an explanation of these terms)</i>		Yes	No
2.1	Legally compliant		
2.2	Compliant with the duty to co-operate		
2.3	Sound		✓

Question 3: Why is the Local Plan unsound? Please only answer this question if you answered 'No' to 2.3 above

If you think this paragraph or policy of the Plan is not sound, is this because:	
It is not justified	✓
It is not effective	✓
It is not positively prepared	✓
It is not consistent with national policy	✓

Your comments

Please give details of why you consider this part of the Local Plan is not legally compliant, is unsound or does not comply with the duty to co-operate. Alternatively, if you wish to support any of these aspects please provide details. Please be as precise as possible. Continue on an extra sheet if necessary.

See attached Statement

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Yes, I wish to participate at the public examination

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No, I do not wish to participate at the public examination

If you wish to participate at the public examination, please outline why you consider this to be necessary

We wish to participate at public examination to explore fully the concerns we have with the soundness of the Plan.

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**BROXTOWE LOCAL PLAN PART 2:
PUBLICATION VERSION**

**Representations by OXALIS PLANNING on behalf of BLOOR
HOMES**

Contents

Representations:

- 1.0 Introduction**
- 2.0 Housing Delivery**
- 3.0 Land in the vicinity of the HS2 Station at Toton – Policy 3.2**
- 4.0 Approach to self-build and custom-build housing – Policy 15**
- 5.0 Policy 17: Place – Making, Design and Amenity**

Appendices:

- Appendix One : Site Location Plan and Illustrative Masterplan relating to land at Nether Green, east of Mansfield Road, Eastwood**
- Appendix Two: Proposed Site allocation Boundary for Land at Toton**
- Appendix Three: ‘Broxtowe Gateway’ vision document produced by Oxalis Planning April 2017**
- Appendix Four: ‘Broxtowe: Gateway to the East Midlands’ vision document produced by Oxalis Planning March 2014**
- Appendix Five: ‘Toton – Strategic Location for Growth’ produced by Oxalis Planning in December 2015**

1.0 Introduction

- 1.1 These representations have been prepared on behalf of Bloor Homes who have a number of land interests in Broxtowe. Bloor Homes have serious concerns about the soundness of the Plan, particularly in relation to the approach to housing and the allocation at Toton. Details of their concerns are set out in the statement below, with reference to particular policies and paragraph numbers where relevant. The statement also sets out the modifications to the Plan that are considered necessary to make it sound.

2.0 Housing Delivery

- 2.1 The NPPF requires Local Planning Authorities to plan positively to ensure the delivery of the area's 'minimum' housing requirements and to ensure that there is an appropriate 5 year land supply in accordance with paragraph 47 of the NPPF.
- 2.2 It is unclear from Policy 2 of the proposed Plan how the Government's requirements regarding housing delivery will be met. It can be seen from the Housing Trajectory at Table 4 of the Plan that Broxtowe has a significant housing supply shortfall and a persistent history of under delivery. Within this context it is essential that the Council are able to provide certainty regarding the delivery of housing. For the reasons set out below it is considered that the Plan fails to do this and is therefore unsound.
- 2.3 In terms of a 5 year land supply the Plan does not set out how an appropriate land supply should be calculated and how this will then be met by the Plan. It is essential that the Plan, or supporting evidence, contains appropriate information to confirm that the Plan provides a 5 year land supply calculation from adoption of the Plan. The Plan will be unsound unless it can be demonstrated, based on appropriate assumptions that it will bring about a 5 year land supply position.
- 2.4 The Trajectory at Table 4 indicates that the Borough will have sufficient sites to deliver the housing requirement. Indeed it suggests a buffer exists. However Bloor Homes has significant concerns about the assumptions used to inform these figures and the cumulative effect of the uncertainty regarding the delivery of a large number of sites. Within this context Bloor Homes do not consider that the approach is sound, both because of the unrealistic assumptions on individual sites but, most importantly because of the lack of certainty regarding delivery overall.
- 2.5 The Government recognises that more needs to be done to ensure that the right numbers of houses are built. It's White Paper – Fixing Our Broken Housing Market (February 2017) is aimed at just that. The White Paper draws on and makes reference to the work undertaken by the Local Plan Experts Group (LPEG). As well as proposing a new approach to calculating housing needs, the LPEG made recommendations as to how Local Plans should be approached not only to demonstrate a five year land supply but to ensure plans deliver over the whole plan period.
- 2.6 In their Report to Government (March 2016) the LPEG state that:
- 'there needs to be a clearer and more effective mechanism for maintaining a five year land supply, at the same time as ensuring plans consider delivery over the whole plan period and incorporate sufficient flexibility to respond to rapid change' (Paragraph 11.3).*

And they recommend that plans:

'focus on ensuring a more effective supply of developable land for the medium to long term (over the whole plan period), plus make provision for, and provide a mechanism for the release of, developable Reserve Sites equivalent to 20% of their housing requirement' (Paragraph 11.4).

- 2.7 Because of its existing delivery problems, the scale of its shortfall and the uncertainties regarding delivery in the future, it is important that this 'sufficient Flexibility' is adopted by Broxtowe in its Local Plan Part 2. The Local Plan must be flexible enough to guarantee the delivery of the minimum number of new homes in the Plan period.
- 2.8 In simple terms this means planning for more houses so that there is sufficient flexibility now, to take account of inevitable delays to delivery on some sites and lapsed permission or non-implementation on others.
- 2.9 A 20% flexibility allowance or 20% reserve sites as suggested by the LPEG would mean Broxtowe planning for around 7380 dwellings over the Plan period, as opposed to the minimum requirement of 6250 dwellings or the current approach which indicates a potential delivery of 6747 dwellings. This additional flexibility would be some 600 or so more than the Council are currently planning for (7380 – 6747 =600). Such flexibility is the minimum that is required for the delivery of appropriate levels of housing in Broxtowe is to be secured.
- 2.10 There is a range of sites and locations where additional, sustainable development can take place. For example land at Nether Green, east of Mansfield Road, Eastwood (SHLAA ref 203) has been identified as a suitable location for growth by the Council, but the Council has concluded that the site is not needed at the present time. The land at Nether Green is well related to the urban area. It is well contained by the line of the now disused railway, which could also provide a new permanent and defensible Green Belt boundary. The site has the potential to deliver around 200 new homes together with new open space, children's play areas and areas for biodiversity enhancement. The site location together with an illustrative masterplan are shown at Appendix One.
- 2.11 The need for flexibility or the identification of 'reserve sites' is not unusual but is particularly pertinent to Broxtowe because of its historical under performance, the number of sites carried forward from the 2004 Local Plan and the uncertainty regarding the key strategic sites
- 2.12 In terms of strategic sites this uncertainty includes:
- a. Land at Boots, which although the site has permission continues to be complex with significant delivery uncertainties.
 - b. Severn Trent land which is a former sewage treatment works with associated complexities of decontamination and remediation. Housing delivery on the site is therefore highly uncertain.
 - c. Chetwynd Barracks: A current and active Ministry of Defence site. Whilst the MOD have indicated that the site may become available for redevelopment, no firm committed dates are set out and the timing of any closure is subject to change. There remains a potential for a significant delay to the closure of the site or a cancellation. Delivery is highly uncertain therefore.
 - d. Toton: Whilst planning permission exists on part of this site, that permission conflicts with the vision for the site as set out in Policy 3.2. The supporting text to this Policy is confusing and ill-conceived. It is based largely on the East Midlands HS2 Growth

Strategy Document published in September 2017. It includes the statement in relation to the vision for the Toton that

'It will also require higher densities than those currently subject of an extant Outline Planning Consent for the site and this will need careful consideration by Broxtowe Borough Council as the Local Planning Authority.' (Page 20).

Whilst this implies the potential for greater housing numbers in the long term it brings onto question the deliverability of the extant consent and housing delivery in the short to medium term.

2.13 In terms of other allocations or 'committed' sites:

- a. Land at Beeston Maltings – Policy 3.6, has been allocated since 2004. It remains a difficult and complex site and delivery is highly uncertain.
- b. Land in Aysworth includes land allocated since 2004 and although there is extant permission, delivery is not certain.
- c. Two sites in Eastwood were allocated in the 2004 Local Plan and delivery remains uncertain notwithstanding extant planning permission.
- d. Land at Walker Street, Eastwood – Policy 6.1. This forms part of a school and recreation facility. Aside from its individual merits as an allocation, the site has been allocated (although a different part of the overall school site) since 2004 with no development progressing. Given the status of the site and wider uncertainty regarding school places and the quality and quantity of sports and recreation space, the delivery of the site is highly uncertain.
- e. Land south of Kimberley including Kimberley Depot - Policy 7.1. The site is currently a refuse depot with refuse tip. It is unclear if new facilities have been found to facilitate relocation. Notwithstanding, the site will contain areas of contamination which could preclude or limit development. Delivery on the site is therefore uncertain.
- f. Land South of Eastwood Road, Kimberley – Policy 7.2. This site has been allocated since 2004. Development of the site remains complex and delivery highly uncertain.
- g. Builders Yard, Eastwood Road, Kimberley – Policy 7.3. This site has been allocated since 2004. Development on the site remains uncertain.

2.14 The uncertainty in Broxtowe stems principally from the sheer number of complex sites where the level of certainty regarding delivery is extremely low. In these circumstances there is not a sufficiently reasonable prospect that the minimum housing numbers will be achieved and the Plan is therefore unsound. The circumstances in Broxtowe are the very circumstances that have led the Local Plan Experts Group to recommend the introduction of appropriate lapse rates and a 20% reserve site allowance. To adopt the Plan in its current form would perpetuate the current and historic role the planning system has played in creating a crisis in housing through the lack of delivery of new homes.

2.15 The Plan needs to be modified to address the problems set out above. This should include:

- A critical review of the reliance on particular sites to deliver new homes;
- A significant increase in the number of new homes planned for (to at least 7380 over the Plan period) through the allocation of additional land;
- The inclusion of a five year land supply calculation and demonstration that, on adoption, the Plan will provide a suitable land supply (and the allocation of additional land to address 5 year land supply issues if necessary);

-
- The allocation of land at Mansfield Road, Eastwood, for around 200 dwellings together with the removal of the land from the Green Belt (as shown at Appendix One);
 - The allocation and removal of additional land from the Green Belt at Toton, see Appendix Two. Together with a complete re-appraisal of the approach to the development of land at Toton as set out below and shown in the vision documents at Appendices 3, 4 and 5.

3.0 Land in the vicinity of the HS2 Station at Toton – Policy 3.2

- 3.1 The Council's approach to the planning of the Toton area in response to the unique opportunity presented by HS2, the tram and the strategic highway connections, is confused and fundamentally flawed.
- 3.2 It is currently unclear from the Policy how it is envisaged that development within the Plan period (the provision of 500 houses) fits with and will not prejudice the delivery of the wider aspirations for the site set out as *'key development requirements beyond the Plan period'*. Furthermore it is unclear whether the supporting text relates to the plan period requirement or beyond plan period or both.
- 3.3 Crucially the Plan ignores the Peveril Homes Housing scheme which was recently granted consent by the Council on the majority of land west of Toton lane. It is inconceivable how the delivery of this permitted scheme is compatible with the Policy aspirations for the site set out in the Plan. It is clear that the Policy aspirations as set out in the supporting text are linked with the vision for the site set out in the East Midlands HS2 Growth Strategy (September 2017). This strategy envisages an 'innovation village' on the site, but this is located on land where there is already planning permission for a 500 unit suburban residential scheme.
- 3.4 Oxalis Planning on behalf of Bloor Homes have consistently advocated a more comprehensive and forward thinking approach to the land at Toton, including strongly opposing the consenting of the Peveril Scheme which would clearly prejudice the delivery of a more comprehensive and innovative response to the opportunity presented by HS2. These concerns were ignored and it is now clear that the approved Peveril scheme is incompatible with the vision for the site now being set out. A fundamental re-think of the Policy is required. A different response will be required depending on whether the Peveril scheme is implemented, but changes will be required to make the Plan sound in any event.
- If the Peveril scheme is not implemented, for example in order for the vision set out by the East Midlands HS2 Growth Strategy to be progressed; the Plan will need to be amended because additional land will be needed so that new homes can be delivered in the short term. The aspirations set out in the Growth Strategy in relation to the innovation village will necessarily take many years to work up given that the mix and scale is unlikely to be commercially appropriate or viable prior to the delivery of HS2. Land to the east of Toton Lane will be needed, to help to deliver new homes quickly. This land, as set out in the Oxalis vision documents can deliver homes on a more conventional basis and allow for land adjacent to the HS2 hub, west of Toton Lane, to be retained for future development more directly associated with HS2.

Or

- If the Peveril scheme is implemented, a new masterplan approach and revised vision for land at Toton would be required to take account of the committed scheme. The

committed scheme is fundamentally at odds with the Growth Strategy and it would prejudice its delivery. The strategy for the site would need to change. Additional land to the east of Toton Lane, would need to be introduced to help deliver the overarching aspirations for the site as set out in the East Midlands HS2 Growth Strategy.

- 3.5 Unless these compatibility issues can be resolved the Plan will be unsound.
- 3.6 Oxalis planning on behalf of Bloor Homes have consistently advocated a more ambitious approach to the Planning of the area around HS2, including, importantly, the inclusion within a comprehensive scheme of land to the east of Toton Lane. The constrained approach to the allocation both limits the appropriate planning of the area and ignores the context provided by existing built form, landscape and other features on the ground. The tram line is not an appropriate Green Belt or development boundary. An allocation which reflects the opportunities for development on land east of Toton Lane and north of the tram line should be made – as shown by the Plan at Appendix Two.
- 3.7 Oxalis Planning on behalf of Bloor Homes have over past 5 or so years, prepared a number of masterplan documents illustrating ways in which land at Toton could be developed. These include a 'Broxtowe Gateway vision' Document produced in April 2013 (Appendix Three); a 'Broxtowe - Gateway to the East Midlands' vision document produced in March 2014 (Appendix Four) and a 'Toton – Strategic Location for Growth' document produced in December 2015 (see Appendix Five). These three documents are appended to this submission for ease of reference and to provide details of the approach advocated by Oxalis on behalf of Bloor Homes. These documents should be read in conjunction with these representations. The fundamental principle of the vision advocated consistently by Oxalis Planning are:
- a. To produce a masterplan for the site which is focussed on the need to deliver an appropriate commercial response to the opportunities presented by HS2. The economic opportunities should be maximised and a specific response to HS2 planned;
 - b. Whilst the precise nature of the commercial development can only be determined by future market demand, the planning of the site should not, in any way, constrain the potential;
 - c. This would mean delivering housing to meet the plan period requirement on land to the east of Toton lane and reserving land to the west of Toton Lane for development directly associated with HS2.
- 3.8 The Oxalis documents include a highway solution that has been largely mirrored in the East Midlands HS2 Growth Strategy (Page 30). Fundamental to this highway strategy is a new junction onto the A52 to the north east of Bardills Island and a partial 'bypass' of the Bardills Junction. Such an approach is however incompatible with Policy 3.2 as currently set out. Policy 3.2 retains as Green Belt, land north and east of Bardills garden centre, land which would be essential for this new infrastructure. Furthermore if this new infrastructure were to be put in place the context of land to the east and west of it would change greatly and become even more appropriate for development.
- 3.9 Policy 3.2 is therefore fundamentally flawed because the area of land to be removed from the Green Belt should include land east of Toton Lane and north of the Tram line. The inclusion of this area would facilitate appropriate infrastructure works and enable a more comprehensive approach to the masterplanning of the area.

-
- 3.10 The Plan has not, in relation to the opportunity presented by HS2, been positively prepared or justified having regard to the evidence base and considering reasonable alternatives.
- 3.11 There are other aspects of the supporting text to Policy 3.2 which are flawed and inconsistent with national policy. The vision sets out ambitions for relocation of existing facilities and the delivery of extensive new community and leisure facilities. However these aspirations have not been discussed with underlying landowners and it remains wholly unclear how these components can be delivered in terms of viability and land assembly or how they would be funded.

4.0 Approach to self-build and custom-build housing – Policy 15

- 4.1 Bloor Homes object to bullet point 8 of Policy 15 which requires 5% of large sites to be delivered as self / custom build Homes. The delivery of self / custom build Homes as part of a large site creates complex delivery, design, Health and Safety and site management issues. On some sites it will also create uncertainty regarding delivery and viability. It is unclear how this requirement would be managed and delivered on the ground alongside the delivery of dwellings constructed by Bloor Homes.
- 4.2 Government Policy supports the provision of self and custom build homes. A key emphasis is on the benefit of this form of housing delivery in boosting the supply of new homes. The blunt requirement set out in Policy 15 will in no way help to boost supply, indeed for the reasons set out it may well delay or restrict supply.
- 4.3 It is considered that a more appropriate response to the Government's requirement would be to identify specific small sites which are capable of delivery as self / custom build homes and to encourage the promotion of small scale windfall sites for such purposes. This could then act to help boost the delivery of new homes.

5.0 Policy 17: Place – Making, Design and Amenity

- 5.1 Some of the criteria within this design policy are misplaced and should be removed. Criteria 1b and 1c are both spatial policies concerned with the location of development as opposed to its form. These criteria should be deleted.

Broxtowe Part 2 Local Plan



Broxtowe
Borough
COUNCIL

Agent

Please provide your client's name	Bloor Homes Ltd
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Your Details

Title	<input checked="" type="radio"/> Mr <input type="radio"/> Mrs <input type="radio"/> Miss <input type="radio"/> Ms <input type="radio"/> Other:
Name	[REDACTED]
Organisation (if responding on behalf of the organisation)	Oxalis Planning Ltd
Address	[REDACTED] [REDACTED] [REDACTED]
Postcode	[REDACTED]
Tel. Number	[REDACTED]
E-mail address	[REDACTED]

Comments should be received by 5.00pm on Friday 3rd November 2017

If you wish to comment on several policies, paragraphs, or sites, please use a separate form for each representation.

If you would like to be contacted by the Planning Policy Team regarding future consultations.

Please tick here ☒

Please help us save money and the environment by providing an e-mail address that correspondence can be sent to: [REDACTED]

For more information including an online response form please visit:

www.broxtowe.gov.uk/part2localplan

Data Protection - The comment(s) you submit on the Local Development Framework (LDF) will be used in the plan process and may be in use for the lifetime of the LDF in accordance with the Data Protection Act 1998. The information will be analysed and the Council will consider issues raised. Please note that comments cannot be treated as confidential and will be made available for public inspection. All representations can be viewed at the Council Offices.

Please return completed forms to:

Planning Policy, Legal and Planning Services, Foster Avenue, Beeston, Nottingham NG9 1AB

For more information: Tel: 0115 917 3452, 3448, 3468 or 3015 E-mail: policy@broxtowe.gov.uk

Question 1: What does your comment relate to? Please specify exactly

Document	Policy number	Page number	Policy text/ Paragraph number
Part 2 Local Plan	Policy 1: Flood Risk		
	Policy 2: Site Allocations		Policy 2
	Policy 3: Main Built up Area Site Allocations		Policy 3
	Policy 4: Awsworth Site Allocation		Policy 4
	Policy 5: Brinsley Site Allocation		Policy 5
	Policy 6: Eastwood Site Allocation		Policy 6
	Policy 7: Kimberley Site Allocations		Policy 7
	Policy 8: Development in the Green Belt		
	Policy 9: Retention of good quality existing employment sites		
	Policy 10: Town Centre and District Centre Uses		
	Policy 11: The Square, Beeston		
	Policy 12: Edge-of-Centre A1 Retail in Eastwood		
	Policy 13: Proposals for main town centre uses in edge-of-centre and out-of-centre locations		
	Policy 14: Centre of Neighbourhood Importance (Chilwell Road / High Road)		
	Policy 15: Housing size, mix and choice		
	Policy 16: Gypsies and Travellers		
	Policy 17: Place-making, design and amenity		
	Policy 18: Shopfronts, signage and security measures		
	Policy 19: Pollution, Hazardous Substances and Ground Conditions		
	Policy 20: Air Quality		
	Policy 21: Unstable land		
	Policy 22: Minerals		
	Policy 23: Proposals affecting designated and non-designated heritage assets		
	Policy 24: The health impacts of development		
	Policy 25: Culture, Tourism and Sport		
	Policy 26: Travel Plans		
	Policy 27: Local Green Space		
	Policy 28: Green Infrastructure Assets		
	Policy 29: Cemetery Extensions		
	Policy 30: Landscape		
	Policy 31: Biodiversity Assets		
	Policy 32: Developer Contributions		
Policies Map			
Sustainability Appraisal			
Other (e.g. omission, evidence document etc.)	Yes, exclusion of sites and approach to Toton allocation.		

Question 2: What is the issue with the Local Plan?

Do you consider this paragraph or policy of the Local Plan to be: <i>(please refer to the guidance note at for an explanation of these terms)</i>		Yes	No
2.1	Legally compliant		
2.2	Compliant with the duty to co-operate		
2.3	Sound		✓

Question 3: Why is the Local Plan unsound? Please only answer this question if you answered 'No' to 2.3 above

If you think this paragraph or policy of the Plan is not sound, is this because:	
It is not justified	✓
It is not effective	✓
It is not positively prepared	✓
It is not consistent with national policy	✓

Your comments

Please give details of why you consider this part of the Local Plan is not legally compliant, is unsound or does not comply with the duty to co-operate. Alternatively, if you wish to support any of these aspects please provide details. Please be as precise as possible. Continue on an extra sheet if necessary.

See attached Statement

Question 4: Modifications sought

Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. Continue on an extra sheet if necessary.

See attached Statement

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Question 5: Public Examination Attendance

If your representation is seeking a modification, do you consider it necessary to participate at the public examination?

Yes, I wish to participate at the public examination

√

No, I do not wish to participate at the public examination

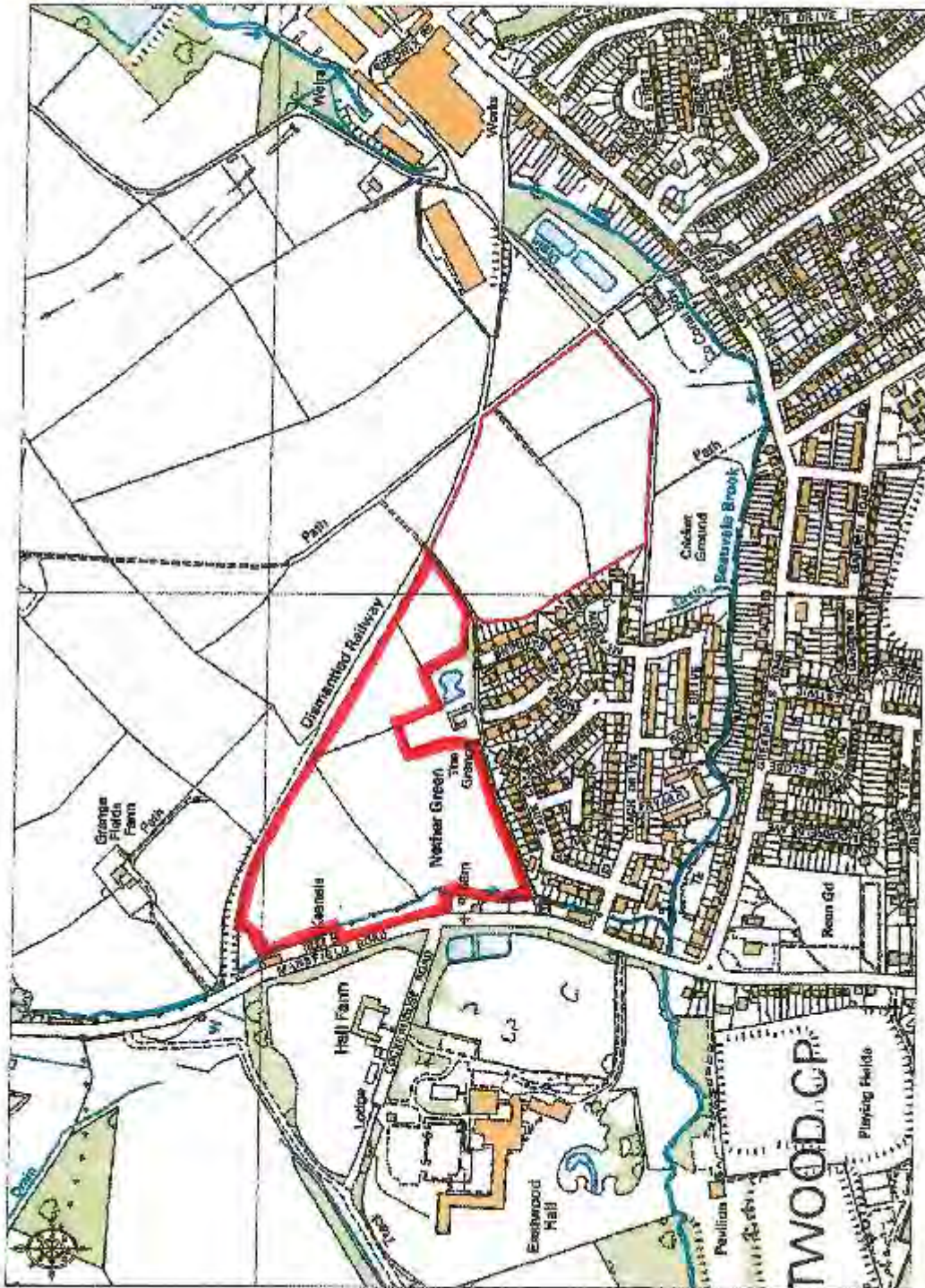
If you wish to participate at the public examination, please outline why you consider this to be necessary

We wish to participate at public examination to explore fully the concerns we have with the soundness of the Plan.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the public examination.

Appendix One:

Site location plan:



DEFINE

- 6** Disused railway line provides a robust northern edge and will be fronted on to by proposed development where possible.
- 7** Existing bridleway buffered from development by adjacent open spaces but benefits from informal overlooking by proposed housing.
- 8** Development forms perimeter blocks and backs on to existing properties where possible.
- 9** Potential emergency access along bridleway.
- 10** Potential provision of pelican crossing to enable easier access to bus stop

- Red line boundary
- Existing Public Right of Way
- Potential new footpath connections through the site
- Potential SUDS



F	Rev	Dwg No	Client	Project	Title	Scale
		065_SK01	Bloor Homes	Land at Eastwood	Sketch Masterplan	1:2,500 @ A3



- 1** Proposed main access off new junction on Mansfield Road (potentially signal controlled).
- 2** Existing vegetation retained to provide visual buffer between proposed development and Mansfield Road corridor.
- 3** Open landscape corridor alongside watercourse, bringing countryside into development and providing opportunities for public access and SUDS.
- 4** Existing landscape structure supplemented with small tree copses to help integrate development and reflect features of the surrounding countryside.
- 5** Existing hedgerows/trees retained where practical to add landscape structure and provide habitat corridors.

Appendix 2

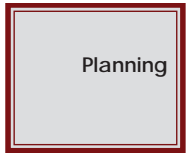


BROXTOWE GATEWAY

V I

An Alternative Vision For A Proposed Broad Location For Growth In Broxtowe

April 2013



WALKER ENGINEERING



BLOOR HOMES

PREFACE

The purpose of this submission is to provide a full and robust response to Broxtowe Borough Council's consultation on Proposed Changes to the emerging Core Strategy. The Council's proposed changes seek to reflect the proposal by Government for a new high speed rail line from Birmingham to Leeds, as part of a new national high speed rail network, with a station at Toton.

We don't believe that the response to high speed rail proposed by Broxtowe Borough Council is sufficiently ambitious or appropriately strategic.

This submission proposes an alternative, bolder vision.

It also reflects on related wider requirements and associated opportunities for the Core Strategy.

The potential vision set out at a high-level in this submission can overcome some existing problems and challenges, and improve the area with widespread benefits for Broxtowe and Greater Nottingham.

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EXECUTIVE SUMMARY

Our Vision And Concept For The Broxtowe Gateway

The high speed rail (HS2) station at Toton creates an opportunity to develop a new, strategic gateway development. Our vision takes a more ambitious and strategic approach than that proposed by the Council's proposed changes which risk under-selling the opportunity offered by HS2.

It takes forward the concept of a mixed-use development built around the high levels of accessibility provided by both an extended NET and HS2, and a greatly improved road network.

Our vision and concept for the Broxtowe Gateway includes:

New works to eliminate traffic congestion;

Up to 4000 new jobs¹;

Retention of the Green Belt north of Toton and Chilwell;

Up to 1200 dwellings alongside the NET

Through a bold, positive response to HS2, Broxtowe Borough Council can seize the unique opportunity and potentially transformational economic advantages offered by high speed rail.

At the same time, it can create a high-quality new gateway to the Borough and wider region, providing a highly sustainable new development which meets local and wider needs over the short and longer-term.

¹ Based on HCA Employment Densities Guide, 2010 – assuming 50 acres developed at 20,000 sq.ft per acre, and 4 jobs per 1000 sq ft.'

Executive Summary - Plans



INTRODUCTION

HS2

High Speed Rail is coming to Broxtowe.

Broxtowe's High Speed Rail station at Toton will serve Greater Nottingham and Derby, as well as the wider East Midlands, as one of only two proposed stations between Birmingham and Leeds, with onward connections to Scotland. It will mean journey times to London of 51 minutes, and Birmingham of 19 minutes. Broxtowe to Paris by train will take approximately 3 hours 30mins. It will literally put Broxtowe on the international map, raising its profile, boosting existing economic sectors and employers, and transforming accessibility to new ones. It will provide access to new markets, to investment, and bring significant opportunities for economic growth.

It will mean jobs and investment.

The government has estimated that construction of the Eastern leg of the high speed network (known as HS2) alone will create around 10,000 jobs, with 1500 direct station related jobs at Toton alone. Further, more significant economic development and jobs will be generated as a result of wider 'agglomeration' impacts – businesses and supply chains attracted by the station and by the benefits of being close to it, and to each other. These benefits will only be maximised if the right land and premises are available around and close to the station.

As set out in this Vision document, with a strategic, employment led response to HS2, Broxtowe could see up to 4,000 jobs² in a new growth area associated with the station hub.

² Based on the HCA's 'Employment Densities Guide', 2nd Edition, 2010.



As a new strategic gateway, the broad location should create a high-quality place, in both physical (built) and natural environmental features and connections. Visitors to the wider region will arrive in Broxtowe from across the UK and elsewhere.

BACKGROUND & CONTEXT

Greater Nottingham & The Wider Region

High Speed Rail is a long-term initiative which enjoys cross-party support, initiated by the previous Government. The current Government is progressing the project, describing it as an ‘engine for growth’ and vital as part of national measures and investments to stimulate economic growth and to support creation of a modern, high-value and low-carbon national economy.

The Government has looked internationally and seen the benefits and opportunities high speed rail can bring³. HS2 is seen as an opportunity to “connect the historic powerhouses of the Midlands and the North and enable them to develop into a vibrant and competitive unit to counterbalance the South East”⁴. However, Government also recognises that while providing the significant national investment in the infrastructure is vital,

“to deliver these benefits there needs to be clear and strongly-led spatial and economic planning”.⁵

Broxtowe will be a key international and national gateway to Greater Nottingham and the wider region, and has an opportunity to ensure it captures the benefits and opportunities that will bring.

This document sets out a vision of the positive, appropriately ambitious local planning response which this potentially transformational initiative demands.

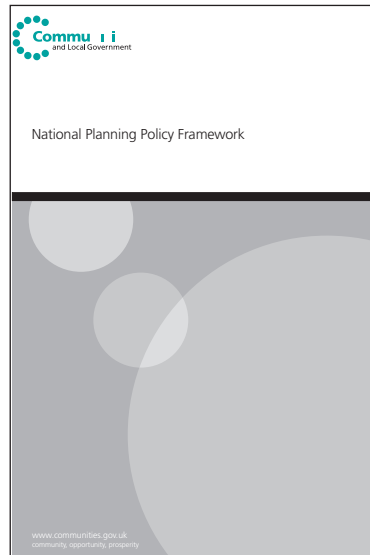
The National Planning Policy Framework (NPPF) provides clear and positive guidance on the importance of planning for economic growth. It emphasises the importance of a positive approach to meeting development needs and requires the planning system to “respond positively to wider

³ Considerable analysis and comparisons of high speed rail around the world is provided by HS2 Ltd: <http://www.hs2.org.uk/about-hs2/high-speed-rail-hs2/high-speed-rail-today>.

⁴ ‘High Speed Rail: Investing in Britain’s Future Phase Two, the route to Leeds, Manchester and beyond’, Dept for Transport, January 2013.

⁵ Para 3.5.9, ‘Economic Case for HS2: Updated appraisal of transport user benefits and wider economic benefits’, HS2 Ltd, for Dept for Transport.

opportunities for growth” (para 17), and plan proactively to support the economy. The general approach proposed in Broxtowe based around identifying a broad strategic location for growth is consistent with the NPPF guidance with regard to plan-making.



“Local Plans should indicate broad locations for strategic development.”

NPPF, para 157

However, this document proposes a larger and more ambitious broad location for growth associated with the station than the initial proposal of Broxtowe Borough Council, but one which is more appropriate given the transformational positive impact HS2 could and should have on Broxtowe.

Technical outputs from work undertaken on Highways, a Landscape assessment, and the detailed response to the Proposed Changes consultation, are attached as appendices:

- i) Planning
- ii) Highways
- iii) Landscape

“Local planning authorities should plan proactively to meet the development needs of business and **support an economy fit for the 21st century.**”

NPPF, para 20

WHY?

Why HS2 Is An Opportunity And Why The Council's Proposed Response Is Inadequate

The National Vision

Successive Governments have recognised the role high speed rail will play as part of wider strategy for delivering and supporting economic growth, as well as in providing a modern, efficient transport system. Delivering economic growth and development remains a key part of the national vision, and central to the background case for high speed rail which enjoys cross-party support nationally.

Phase 2 of high speed rail will cost around £18bn. It represents a significant and unique investment by Government in the nation's infrastructure, but also in the future of its economy. Estimates are that high speed rail will generate £47 billion in user benefits to businesses when the entire network is completed, as well as between £6 billion and £12 billion in wider economic benefits. These wider benefits include businesses being able to access markets and customers more easily, creating new supply chains and opportunities, and being able to recruit staff from a wider area as a result of being more accessible.

The Prime Minister, and numerous senior Government Ministers have repeatedly described high speed rail as an “engine for growth” in the UK, positioning it at the centre of their policy initiatives to rebalance and stimulate economic growth across the regions. Earlier this year, the Secretary of State for Transport, Patrick McLoughlin MP, who is a Derbyshire based MP, stated about HS2:

“I believe that we cannot simply hope for a better future; we have to build it – together. It's a once in a lifetime opportunity and I think we should seize it, for the national benefit.”

Within this context, Government has emphasised the importance and the potential for HS2 to support and enable economic development and investment. As examples, HS2 Ltd, the company set up by the Department of Transport to develop and promote high speed rail says about Phase 2:

“The new station sites will provide a significant opportunity for regeneration and development, both around the stations and across the wider region. Station environs will be attractive sites for investment and new development, bringing new jobs to the area as well as new services and amenities for local communities.”

“Station environs will be attractive sites for investment and new development, bringing new jobs to the area as well as new services and amenities for local communities.”

HS2 Ltd

The Local Opportunity

The current focus is on the route of an Eastern arm of a proposed ‘Y shaped’ network as part of Phase 2 (after London to Birmingham) which would also see a route from Birmingham to Manchester. Government is proposing that on the Eastern network after Birmingham there should be an East Midlands Hub station at Toton, as well as stations serving Sheffield, and Leeds.

This is a major opportunity for Broxtowe and Greater Nottingham. It would, literally, put Broxtowe on the international map. It would make Broxtowe a key gateway for UK and international travellers, including tourists using high speed rail as a way of accessing, for example, the DH Lawrence Heritage attractions, the internationally loved legend of Robin Hood, visiting the Derwent Valley Mills World Heritage Site, and the Peak District National Park.

This creates a chance to capture the benefits of a strategic investment by Government, and to seize the potential economic, connectivity and competitiveness advantages it will bring Broxtowe, Nottingham and Derby.

The Derby Derbyshire Nottingham Nottinghamshire LEP (‘D2N2’) was quick to respond positively to the proposal, with the former Chairman stating:

“Opportunities like HS2 only come round once in a generation and we have to grab them.”

“If we want our businesses to compete in today’s global economy, we need quick, reliable connections to markets, suppliers and **labour sources; and that’s precisely what HS2 will deliver.**”

(Peter Richardson, D2N2 Local Enterprise Partnership, February 2013)

Enabling the delivery of the wider economic benefits referred to above are central to capturing the value of high speed rail to Broxtowe, and to Greater Nottingham. They represent the economic benefits from businesses effectively being closer together as a result of the new connectivity and shorter journey times provided by high speed rail, and can be captured through providing physical opportunities for businesses to be close together, and close to the station itself. Government is clear that:

“to deliver these benefits there needs to be clear and strongly-led spatial and economic planning”.⁶

This has clear and direct implications for the land-use planning in Broxtowe. There are signs that the Council understands the significance of the high speed rail proposal, with the Proposed Changes consultation documents acknowledging that the introduction of HS2 “materially alters” the earlier conclusions reached about development in this location, and that in the context of both high speed rail and the NET 2 line (now under construction) this area “offers the optimum sustainable location based on the transport objective” (para 13, Broxtowe Borough Council’s Sustainability Appraisal Report).

Despite this implicit recognition of the fundamental change it represents, the Proposed Changes to the Core Strategy are not bold or ambitious enough. The proposed response by Broxtowe Borough Council falls somewhat short of properly reflecting or capturing the scale of the opportunity, and

⁶ Para 3.5.9, ‘Economic Case for HS2: Updated appraisal of transport user benefits and wider economic benefits’, HS2 Ltd, for Dept for Transport.

greatly risk failing to secure the benefits on offer. It is vital that Broxtowe and Greater Nottingham ensure their local planning response is befitting of the high speed rail opportunity.

*"This area offers the optimum sustainable location
based on the transport objective."*

(Broxtowe Borough Council's Proposed Changes Sustainability Appraisal Report)



High speed rail will attract businesses and employers to the station, and to the advantages of being near each other. Opportunities exist to provide a high-quality employment led development adjacent to the new station.

WHERE?

An Alternative Broad Location For Growth

The area associated with the station will be attractive to employers and investors keen to make use of the new connections and access it will provide. The Council has already assumed a mixed-use approach to development, and our vision also assumes that this location has a potentially vital role to play in the provision of high-quality, well located and accessible housing land. We believe a mixed-use development served by NET and new high-speed rail should form a core part of the emerging Core Strategy for Broxtowe in the context of high levels of housing need within the Borough and wider Housing Market Area.

The Council's Proposed Changes are explicit in suggesting development should be limited to West of Toton Lane, with limited development potentially located south of the NET line to the East. Reference is made to high-level assessments made several years ago of the sustainability of development locations around Greater Nottingham, and to concerns about landscape impact of any development on a larger scale. But, the supporting documentation associated with the Council's Proposed Changes consultation has recognised that the introduction of high speed rail, in addition to the NET, have 'materially altered' the relative sustainability and suitability of development in this location.

The Council's consultation documents recognise that the introduction of high speed rail, in addition to the NET, have "materially altered" the relative sustainability and suitability of development in this location.

Therefore, our proposal takes a more strategic approach to the identification of the broad location for development.

To inform this vision for Broxtowe Gateway, a thorough site based analysis of the landscape has been undertaken. It has drawn upon the previous landscape appraisals undertaken at Greater

Nottingham and County levels, and has been supplemented by an updated baseline review. This has included on site survey and appraisal work. The detailed report from this analysis is attached as Appendix iii.

It recognises that while this location represents a varied urban edge, it is an unremarkable landscape, and is consistent with the Greater Nottingham Landscape Assessment which described the strength of character as “Moderate to Weak”. That earlier study had advised that the area is heavily influenced by the urban environment. Our analysis recognises some features of value and interest, but that overall the landscape is not of high quality.

Similarly, the Tribal⁷ work of 2010 considered this area, and recognised the amenity value to local residents but also noted its development potential. Tribal explicitly recognised the A52 as a “defensible barrier” in strategic terms.

“Although this is a strategic Green Belt gap...the NET extension is projected to terminate here, strengthening the case for some **development here**”;

“Thanks to the defensible barrier of the A52, it could be regarded more properly as a northern expansion of Chilwell”

Tribal, with reference to ‘Area G’, and south of Common Lane

Our landscape analysis concludes that land within the area both east and west of Toton Lane can assimilate mixed use development. The new place has the potential to deliver an extensive array of landscape, amenity and environmental proposals, and to form an exemplar of Green Infrastructure provision.

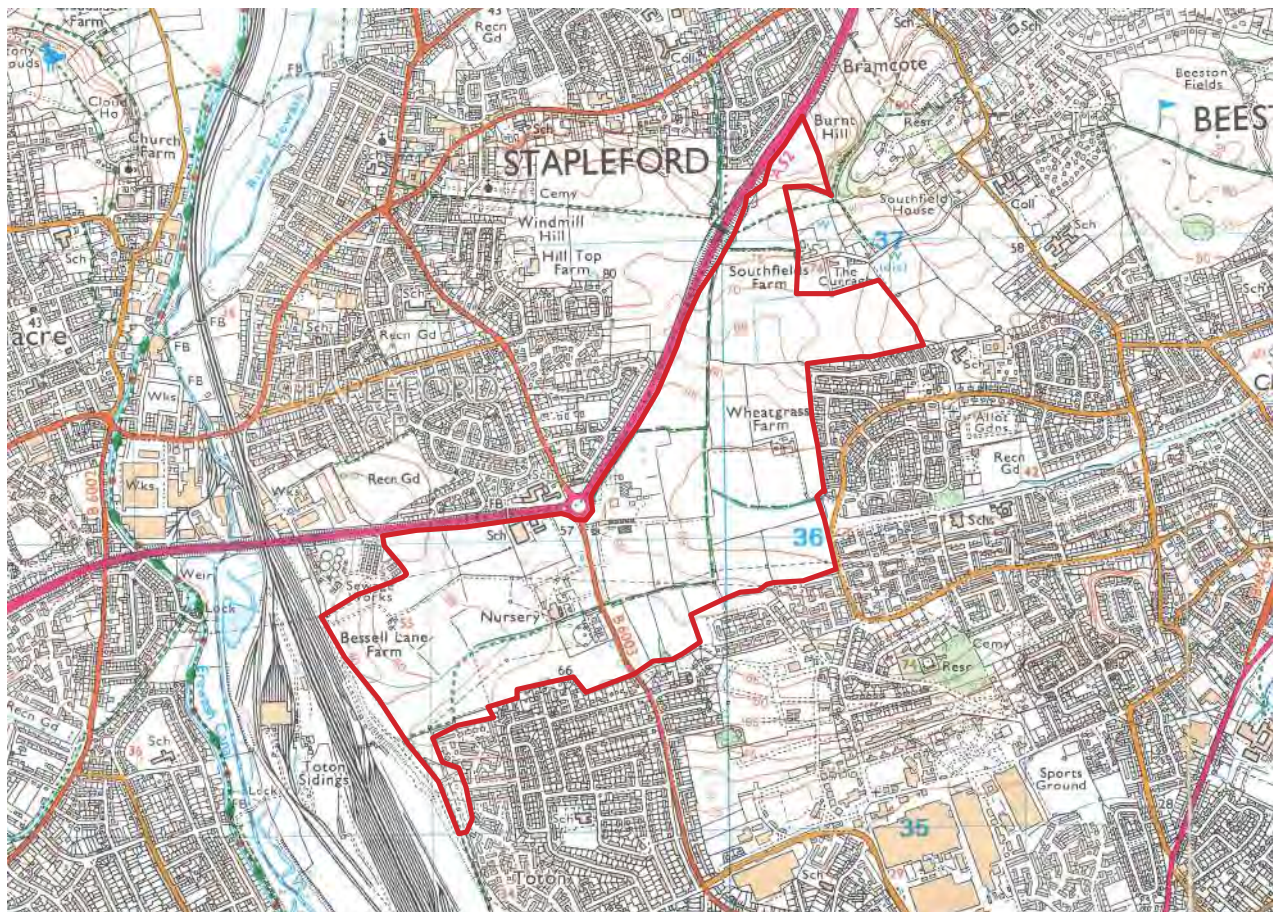
As described in Appendix iii, the most important reasons given by Tribal for discounting this area

⁷ Greater Nottingham Sustainable Locations for Growth, Tribal, Feb 2010.

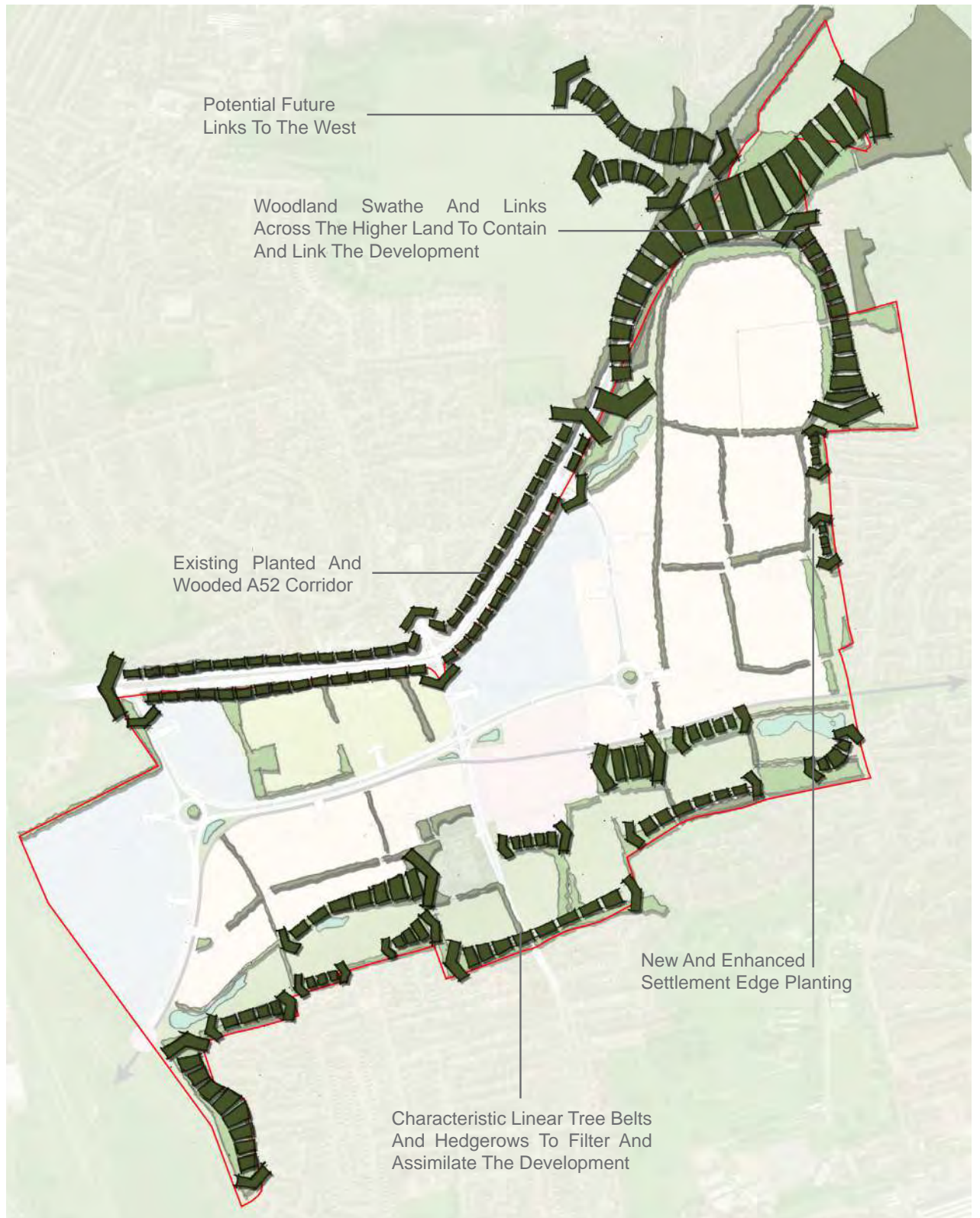
are instead important factors that can and could be used positively to shape suitable development at this location. A high quality response to these issues should realise the creation of a distinctive new place drawn from a clear understanding of the existing environment, and both current and planned future changes.

As a result, the vision of development potential presented here is based around landscape and green infrastructure principles, including strengthening some existing tree and woodland belts, and retaining and extending pedestrian links. The retention of a broad green belt landscape corridor to the existing edges of Chilwell and Toton and south of the new NET line would form part of this outer landscape framework.

The vision assumes the adoption of best practice 'placemaking' principles, maximising environmental and recreational opportunities, and minimising any perceived strategic or other landscape effects.



Vegetation Corridor Plan



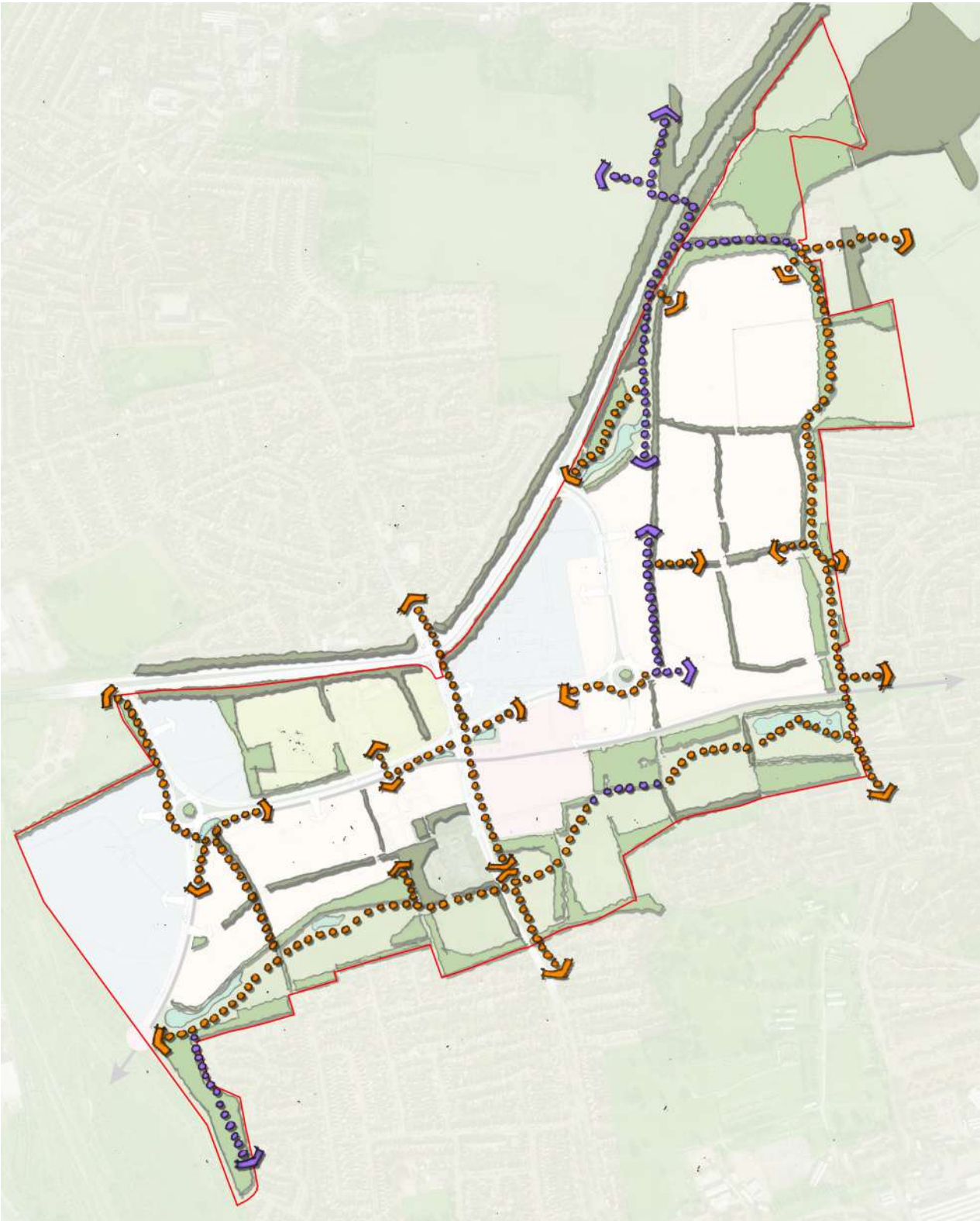
Site Boundary
350.4 Acres

Proposed Vegetation Corridors



0 100 200 300 400 500m

Public Rights Of Way Plan



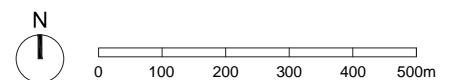
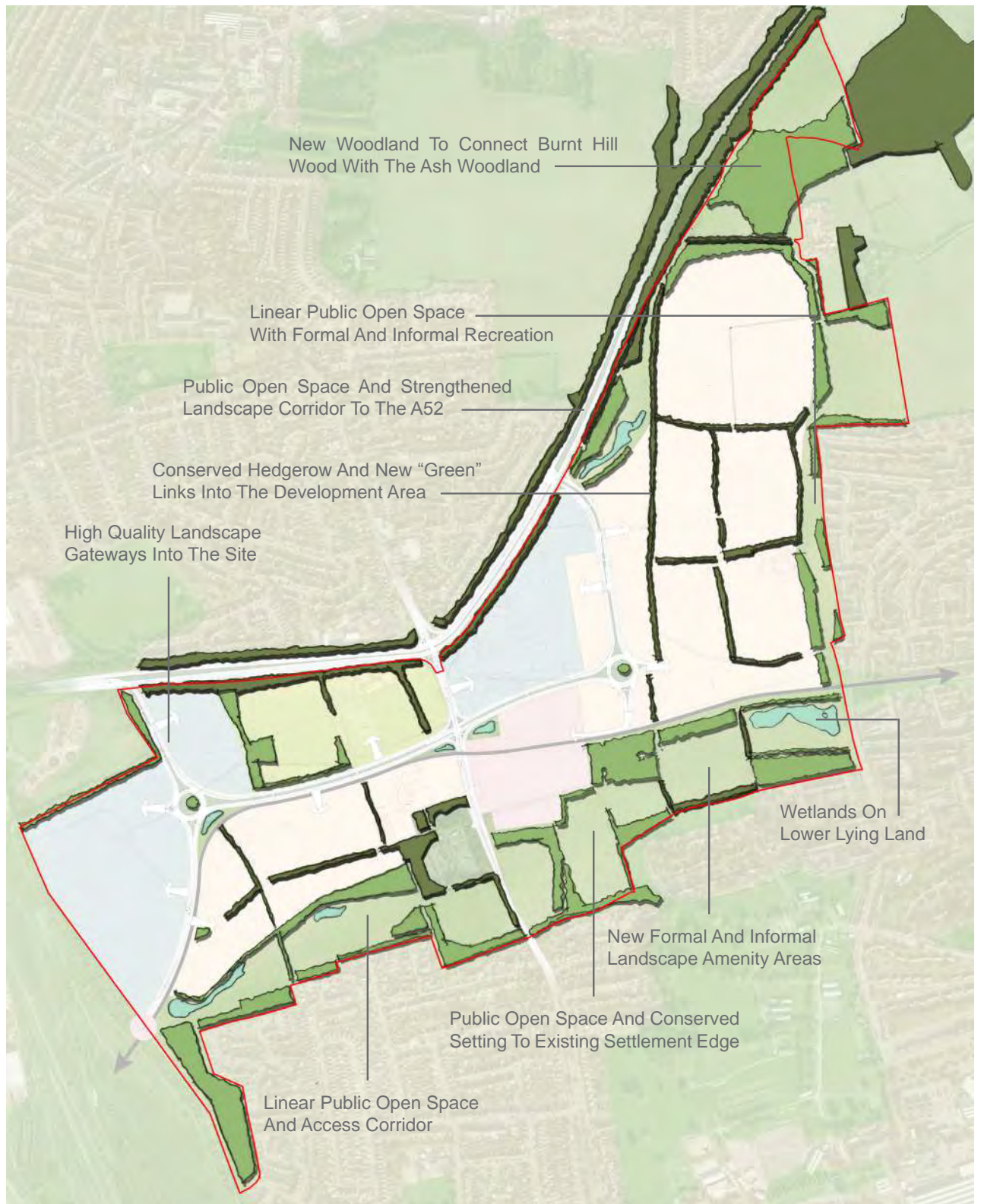
Site Boundary
350.4 Acres

Existing Public Rights Of Way

Proposed Public Rights Of Way



Green infrastructure Plan



WHAT?

What Is The Proposed Vision For The Broxtowe Gateway?

Our proposal is bold and ambitious.

It follows the lead provided by Broxtowe Borough Council's Proposed Changes for a broad location to accommodate mixed use development, but it proposes a much stronger emphasis on significant new employment space. It represents a strategic land-use proposal in response to the new strategic transport infrastructure and strategic connectivity proposed by Government. Our vision takes forward the Council's conclusion that high speed rail, plus the opportunities from NET, 'materially alter' the potential for sustainable development in this area.

The introduction of high speed rail at Toton demands high-quality place-making in terms of both the physical development, and treatment of the natural environment. As a new, strategic gateway, the area associated with the station must be planned as such, providing the right first impression to investors and visitors, and providing opportunities to realise the economic development and activity the high speed rail line and station will generate. A high-quality place needs to be created in response to, but in advance of, the station and opening of HS2.

Our vision is under-pinned by an emphasis on the importance of this as a new, strategic gateway. The vision includes an emphasis on the quality public spaces, high-quality buildings, and excellent connectivity. The attached indicative high-level vision concept plan indicates the potential of this location.

It is sustainable and appropriate in a location to be served not only by the NET, and the high speed rail network in due course, but which also enjoys a location adjacent to the A52 trunk road. A major component of our vision, as described in the attached appendix, seeks to eliminate existing traffic congestion along this stretch of the A52 and Toton Lane, therefore providing a major benefit to existing as well as new users, residents and occupiers.

Key headline elements of our vision of the development potential at Broxtowe Gateway are:

- Approximately 50 acres of employment land provided both east and west of Toton Lane, potentially accommodating up to 4000 jobs;
- Retained green belt separation north of the existing communities of Toton and Chilwell, retaining opportunities for informal recreation and exercise;
- Approximately 120 acres of residential development which could provide around 1200 new homes, phased in response to Broxtowe's land supply needs over the short and longer-term;
- Reconfigured highway junctions to serve the broad location, but crucially to improve existing travel conditions on and around the A52. Congestion on the A52 around this location would be eliminated by replacing the existing Bardills 5 way roundabout with a series of 4 new and interrelated junctions.

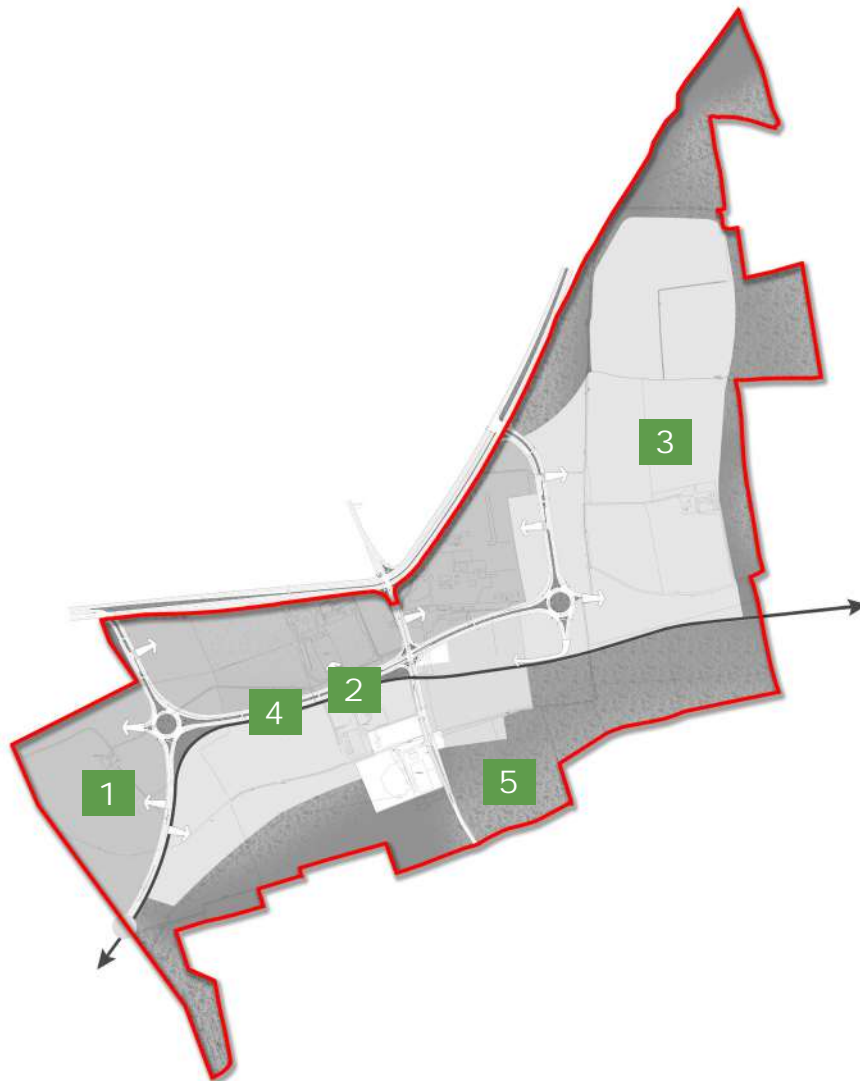
“Eliminate existing traffic congestion.”

(Appendix ii, Access Technical Note)

DEVELOPMENT POTENTIAL

The concept plan incorporates the following fundamental elements:

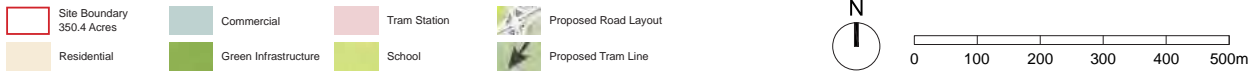
- 1 New employment uses focused on the areas closest to the HS2 station;
- 2 NET line extension running directly to the south of the existing Secondary School, offering opportunities for sustainable access by local students;
- 3 Residential development to include a range of densities, with potential for higher densities adjacent to the NET route – around half the residential properties would be within 250m of the NET;
- 4 NET running adjacent to new highways to provide opportunities for modal interchange;
- 5 A green buffer, and use of the existing landscape character to limit visual impact, but also provide recreation, plus walking and cycling links.



Ensuring excellent accessibility to the city centres of Derby and Nottingham, and the Enterprise Zone(s) will be vital, with NET being central to that in Nottingham. Our proposals are for the extension of the NET to the new high speed rail station itself, ensuring full integration of transport modes, including connectivity to the traditional (classic) rail network, and maximising the potential for travel by sustainable modes to and from Nottingham.

In addition, our proposals include significant investment in a reconfigured highway network which would eliminate congestion on the A52 and greatly reduce delays, benefitting not only the users of the station and associated development, but also existing users of this key trunk road between the cities. The proposed highways scheme would provide sufficient capacity for all existing movements, plus the proposed development, as well as the NET Park & Ride and all future growth up to 2026, including the potential HS2 Station.

Development Potential Plan



Reconfigured Highway Junctions

Junction 1 – Bardills Cross-Roads

The existing five-arm Bardills Roundabout would be replaced by a four-arm signalised cross-roads at the same location. The A52 eastbound approaches would be widened to four lanes, with Toton Lane to the south being dualled. The existing Garden Centre access would be relocated and replaced by a pair of split pair junctions; one to the south along Toton Lane and one to the east along one of the new Link Roads.

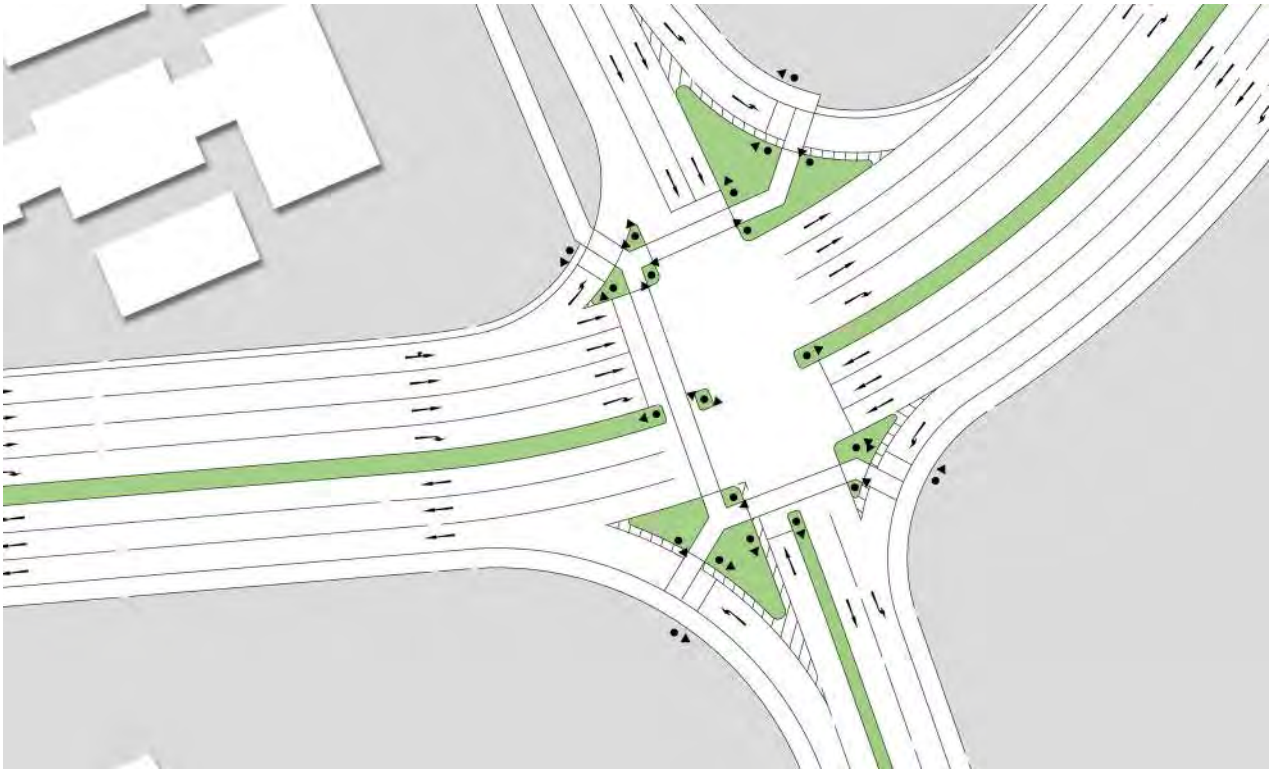
All right-turns would be banned at the new cross-roads. This would be enforced through the use of cameras and will enable the junction's traffic lights to operate in a simple two-phase manner, greatly increasing efficiency and capacity. As a result, modelling shows that the junction will be able to accommodate all existing traffic, the NET Park & Ride, the proposed Development, general traffic growth and even the HS2 Station without any queuing. This is a major benefit of the scheme.

Right-turns lost at the junction would be accommodated by a series of alternative movements as follows:

- Right-Turn into Toton Lane (North) – Westbound A52 traffic would come off the A52 at Junction 2 and then right-turn at both Junctions 3 and 4 before crossing Junction 1 from south to north. This is not a big traffic flow at present.
 - Right-Turn into Toton Lane (South) – Eastbound A52 traffic heading for Toton and Chilwell or the NET Park & Ride would stay on the A52 through Junction 1 before turning right at Junction 2, where such a manoeuvre would be provided for via two new dedicated lanes on the A52 eastbound side. Park & Ride traffic would then access the NET directly at Junction 3, whilst that bound for Toton and Chilwell would right-turn there before rejoining Toton Lane at Junction 4 by turning left.
 - Right-Turn out of Toton Lane (North) – This manoeuvre would be accommodated by heading straight ahead out of Toton Lane and then completing the anti-clockwise loop at Junctions 4, 3 and 2 respectively, where left-turn filters would be provided. Traffic would then head west across Junction 1 at the traffic lights.
-

- Right-Turn out of Toton Lane (South) – This manoeuvre would be easy to achieve by simply turning right at Junction 4, left at Junction 3 and then right at Junction 2.

Based on the above, it can be seen that all movements lost at Junction 1 would be readily available elsewhere on the network, without undue inconvenience.

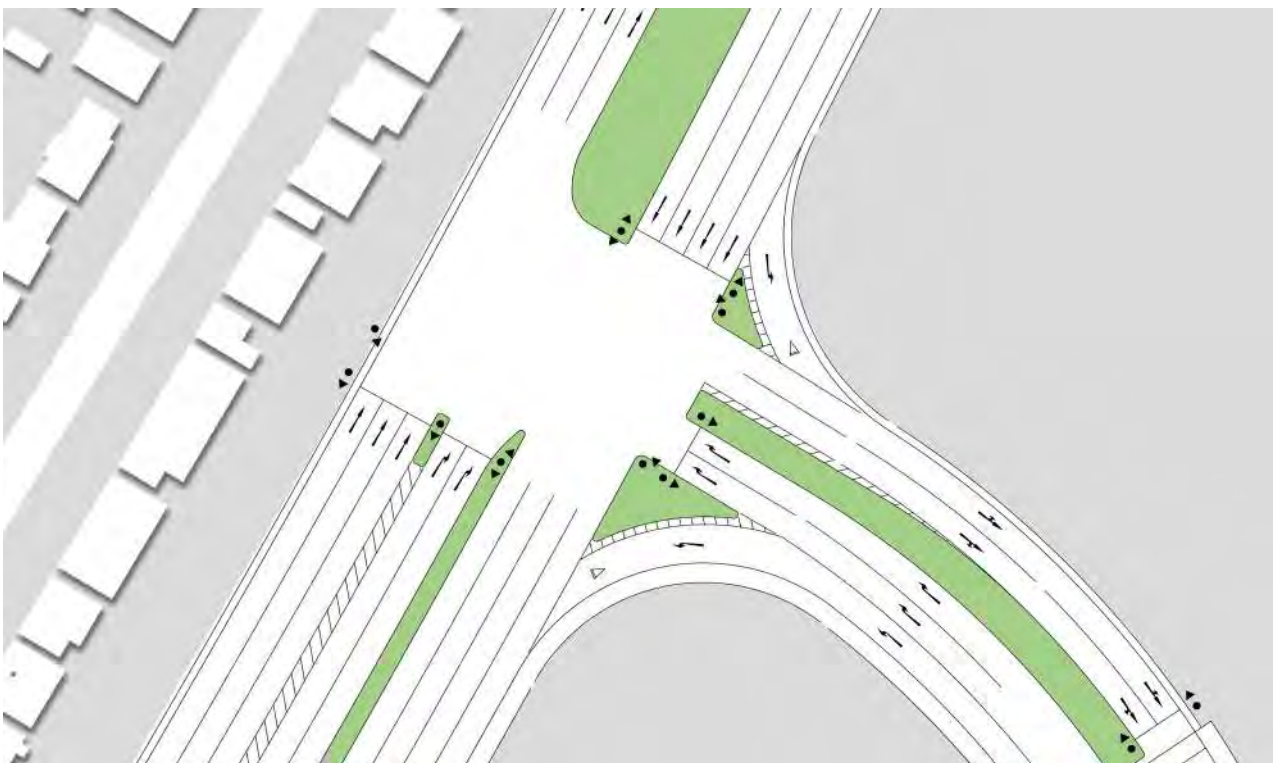


Junction 1 – Bardills Cross-Roads - Not To Scale

Junction 2 – Site Access (East)

Space is limited at Junction 1 to accommodate all movements required and even in a four-arm configuration, signals would be inefficient. The intention is therefore to provide a new signalised T-Junction to the east of Bardills, where land is available to better cater for what is needed. Two right-turn lanes would be provided for eastbound to southbound and Park & Ride traffic, whilst the A52 would be widened to three lanes eastbound and four lanes westbound through the junction for through traffic. The resulting layout has been tested and should easily be able to provide for all necessary traffic flows up to 2026.

Under the proposal, through traffic on the A52 in both directions will negotiate two junctions (Junctions 1 and 2) in the future, where as it only has to pass through the Bardills Roundabout at present. However, the existing junction is heavily congested and thus the peak hour journey time is significant, even if only one junction is involved. Modelling for the future scenario on the other hand shows that with the proposed Junctions 1 and 2 in place and operating in tandem, delays to traffic travelling on the 52 will be greatly reduced. Congestion would be entirely eliminated. There is therefore a distinct advantage in the proposed layout for strategic A52 traffic, when compared to the status quo.



Junction 2 – Site Access (East) - Not To Scale

Junction 3 – NET Access Roundabout

A signalised roundabout is proposed to provide access to the NET and also development land to the east. Signals have been incorporated to allow better integration with the other proposed junctions and also to provide a degree of control and pedestrian priority. A roundabout layout has been retained however (as opposed to a signalised cross-roads) as this allows U-turns to be made from the main Link Road and is also much more efficient in terms of capacity and land-take.

All normal traffic movements can be made at this junction and modelling shows it would easily meet all capacity requirements over the Plan period.



Junction 3 – NET Access Roundabout - Not To Scale

Junction 4 – Site Access (South)

A signalised T-Junction would be provided along Toton Lane to the south of the Bardills Roundabout to complete the layout, with the provision to allow its conversion into a cross-roads if required to serve development land to the west or the HS2 Station. All movements would be provided for and the junction would replace the NET access currently under construction. Modelling shows that in this format, the junction would have sufficient capacity to accommodate all existing, development and future traffic up to 2026.

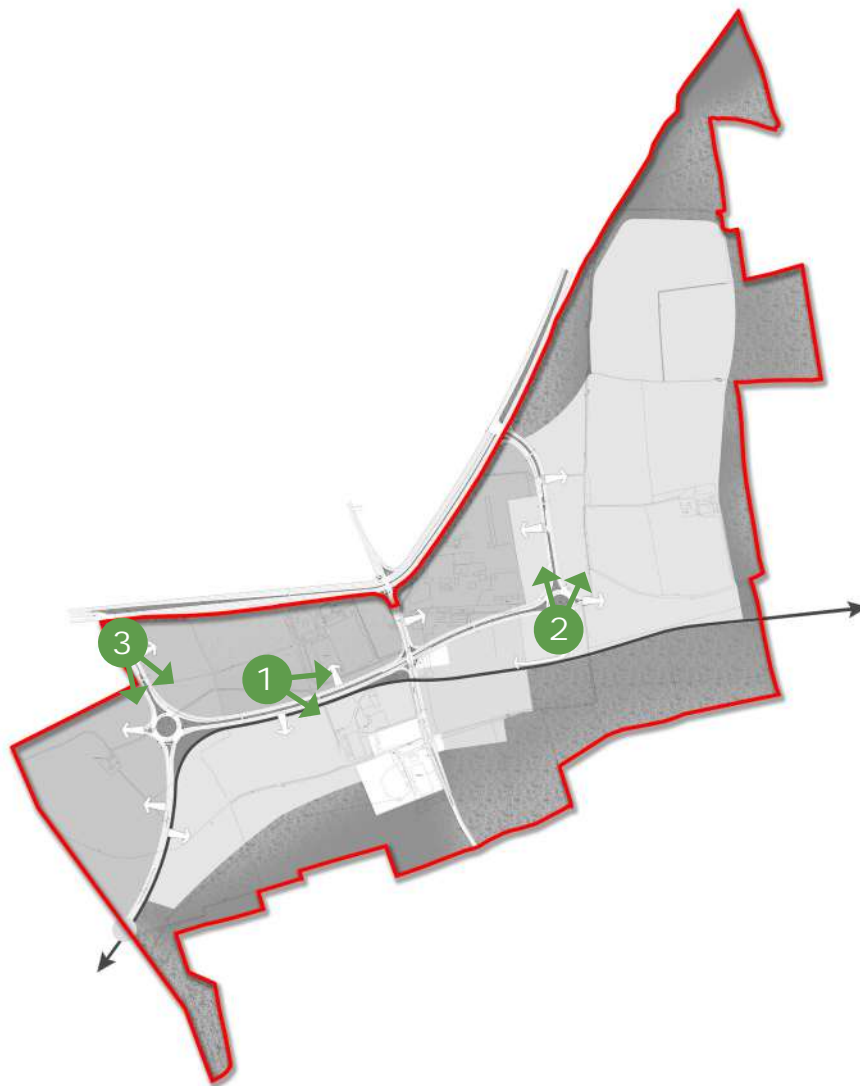
In its cross-roads configuration, the right-turn to the west from the southbound Toton Lane would be banned and re-provided for via Junctions 1, 2 and 3 in a clock-wise loop, with traffic then travelling straight across Junction 4 from east to west. In this mode, the lane layouts on the main dual carriageway Link Road would need to be changed, but this would be built into the initial layout through the use of hatching to minimise future works. Once these changes have been made, the junction would be capable of accommodating the development of land to the west as identified, as well as the HS2 Station, up to the year 2026.

Existing and future traffic congestion would be eliminated.



Junction 4 – Site Access (South) - Not To Scale

INDICATIVE SKETCHES



A high-quality, accessible and sustainable development. NET would directly serve both residential and commercial development, as well as the new high speed rail station.

Walking and cycling links would ensure integration, and maximise the opportunities for sustainable movement and lifestyles as part of a comprehensive mixed use development.



Boulevards, incorporating part of the comprehensive Green Infrastructure provision, would ensure the Broxtowe Gateway proposal would create a new, high-quality place to greet visitors to the region.

New highways would serve the broad location, and eliminate existing and future congestion from the A52.



As a key gateway location, high quality, modern office employment space will ensure an appropriate environment for inward investment. Employment space will be focussed adjacent to the HS2 station.



HOW?

How Should These Proposals And Vision Be Taken Forward?

High speed rail is a long-term and strategic project which will be delivered over the next 20 years; but planning for it at the local level must begin now, and we entirely support Broxtowe Borough Councils decision to make changes now to the emerging Core Strategy. Ensuring that the Core Strategy, which plans to 2028, makes appropriate provision for high speed rail and associated development at Toton must be the immediate focus.

Broxtowe Borough Council, working with partners including the D2N2 LEP, need to ensure they provide clear and strong leadership in taking the high speed rail proposal forward at the local and sub-regional level.

The Council must show to Government, and to the region's businesses, that it recognises the significance of the opportunity, and that it understands the importance of capturing the benefits to the local and national economy.

We don't believe that the current response to HS2 proposed by Broxtowe Borough Council in the Proposed Changes document is sufficient or appropriate.

As detailed in the earlier sections, we believe a different approach should be taken, and hope the vision set out is one which will soon be shared by Broxtowe Borough Council's members and wider leadership. This Vision can be realised through a collective and joined-up approach, with the Council working with the consortium of developers and landowners to ensure the policy framework provides for a strategic broad location for growth. Further work can then be undertaken, including in due course an agreed masterplan or development brief.

As referred in the previous section, we consider that this location provides a more sustainable and appropriate location to contribute towards Broxtowe's and the wider Housing Market Area's

housing land supply than alternative potential locations in the Borough and beyond which do not enjoy the benefits of NET and high-speed rail connectivity.

The broad location indicated should be removed from the Green Belt and identified for development associated with, and in response to, the high speed rail station.

The Council must show to Government, and to the region's businesses, that it recognises **the significance of the opportunity, and that it understands the importance of capturing the benefits to the local and national economy.**

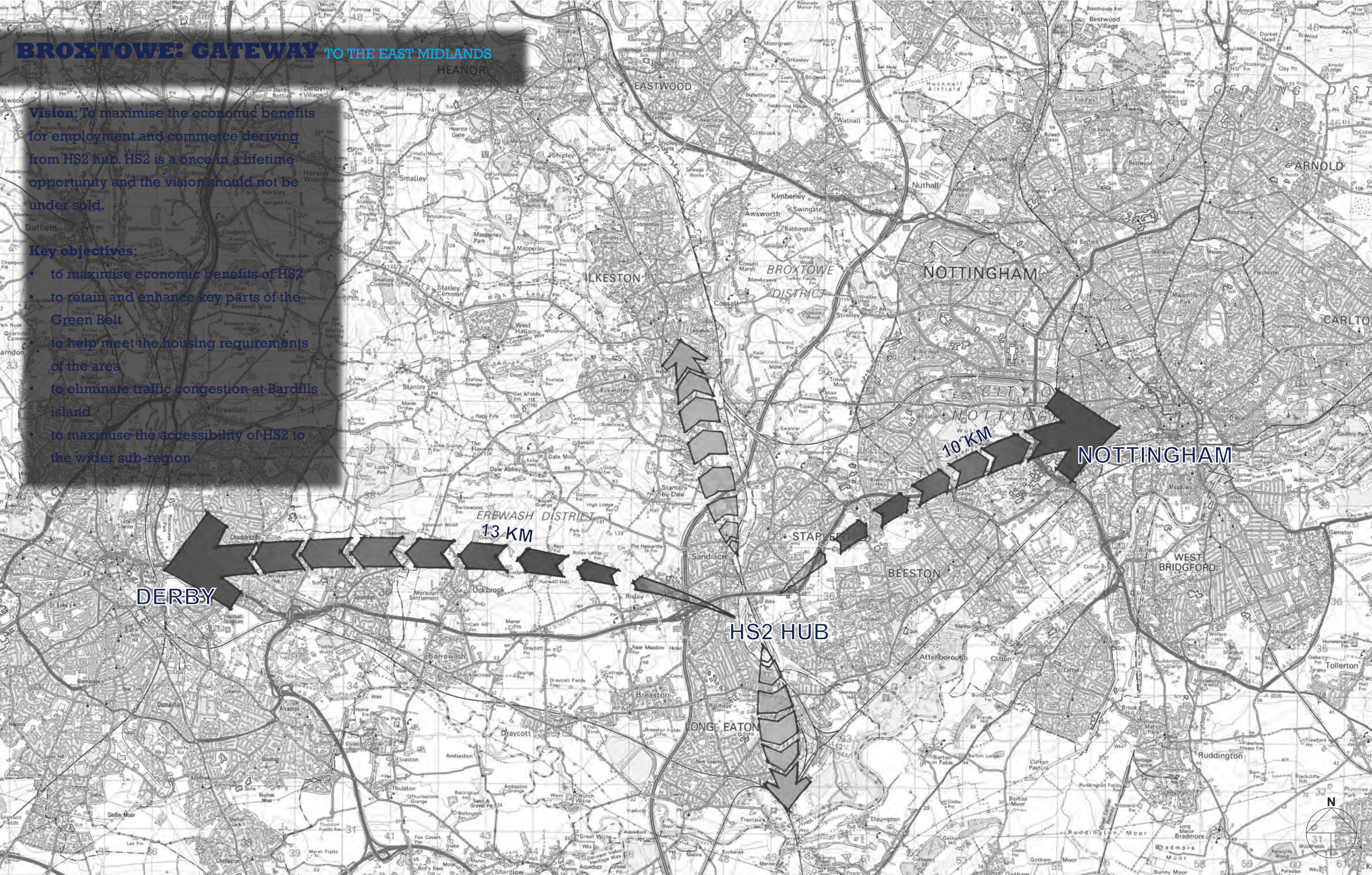
This Vision can be realised through a collective and joined-up approach, with the Council working with the consortium of developers and landowners to ensure the policy framework provides for a strategic broad location for growth.

BROXTOWE: GATEWAY TO THE EAST MIDLANDS

Vision: To maximise the economic benefits for employment and commerce deriving from HS2 hub. HS2 is a once in a lifetime opportunity and the vision should not be under sold.

Key objectives:

- to maximise economic benefits of HS2
- to retain and enhance key parts of the Green Belt
- to help meet the housing requirements of the area
- to eliminate traffic congestion at Bardills island
- to maximise the accessibility of HS2 to the wider sub-region



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THE VISION

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BROXTOWE: GATEWAY TO THE EAST MIDLANDS

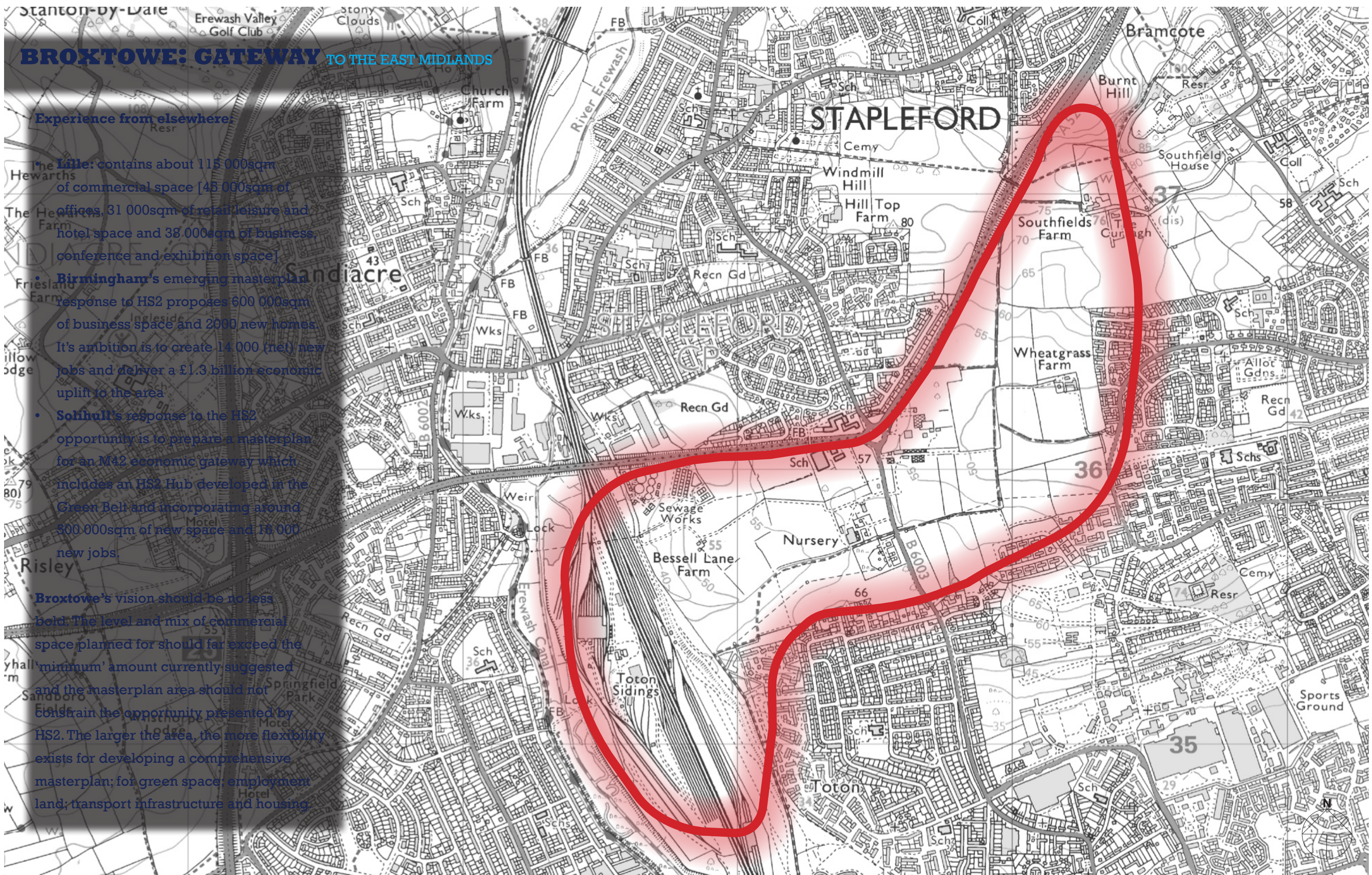
Experience from elsewhere:

- **Leile:** contains about 115 000sqm of commercial space [45 000sqm of offices, 31 000sqm of retail leisure and hotel space and 38 000sqm of business, conference and exhibition space]

- **Birmingham's** emerging masterplan response to HS2 proposes 600 000sqm of business space and 2000 new homes. It's ambition is to create 14 000 (net) new jobs and deliver a £1.3 billion economic uplift to the area

- **Solihull's** response to the HS2 opportunity is to prepare a masterplan for an M42 economic gateway which includes an HS2 Hub developed in the Green Belt and incorporating around 500 000sqm of new space and 18 000 new jobs.

Broxtowe's vision should be no less bold. The level and mix of commercial space planned for should far exceed the 'minimum' amount currently suggested and the masterplan area should not constrain the opportunity presented by HS2. The larger the area, the more flexibility exists for developing a comprehensive masterplan; for green space; employment land; transport infrastructure and housing.



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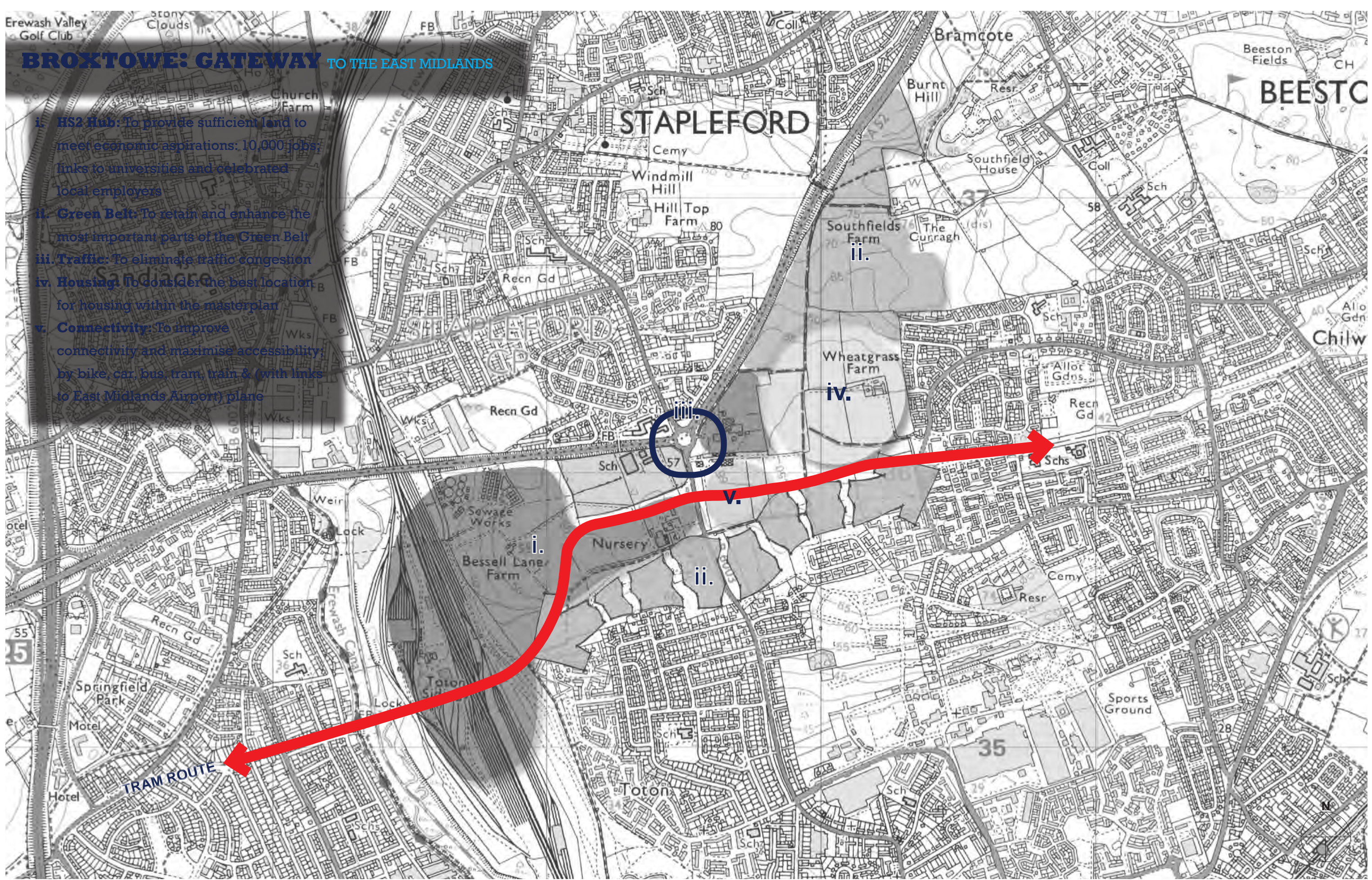
THE SITE

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BROXTOWE: GATEWAY TO THE EAST MIDLANDS

- i. **HS2 Hub:** To provide sufficient land to meet economic aspirations: 10,000 jobs; links to universities and celebrated local employers
- ii. **Green Belt:** To retain and enhance the most important parts of the Green Belt
- iii. **Traffic:** To eliminate traffic congestion
- iv. **Housing:** To consider the best location for housing within the masterplan
- v. **Connectivity:** To improve connectivity and maximise accessibility: by bike, car, bus, tram, train & (with links to East Midlands Airport) plane

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Bloors
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Toton

OBJECTIVES

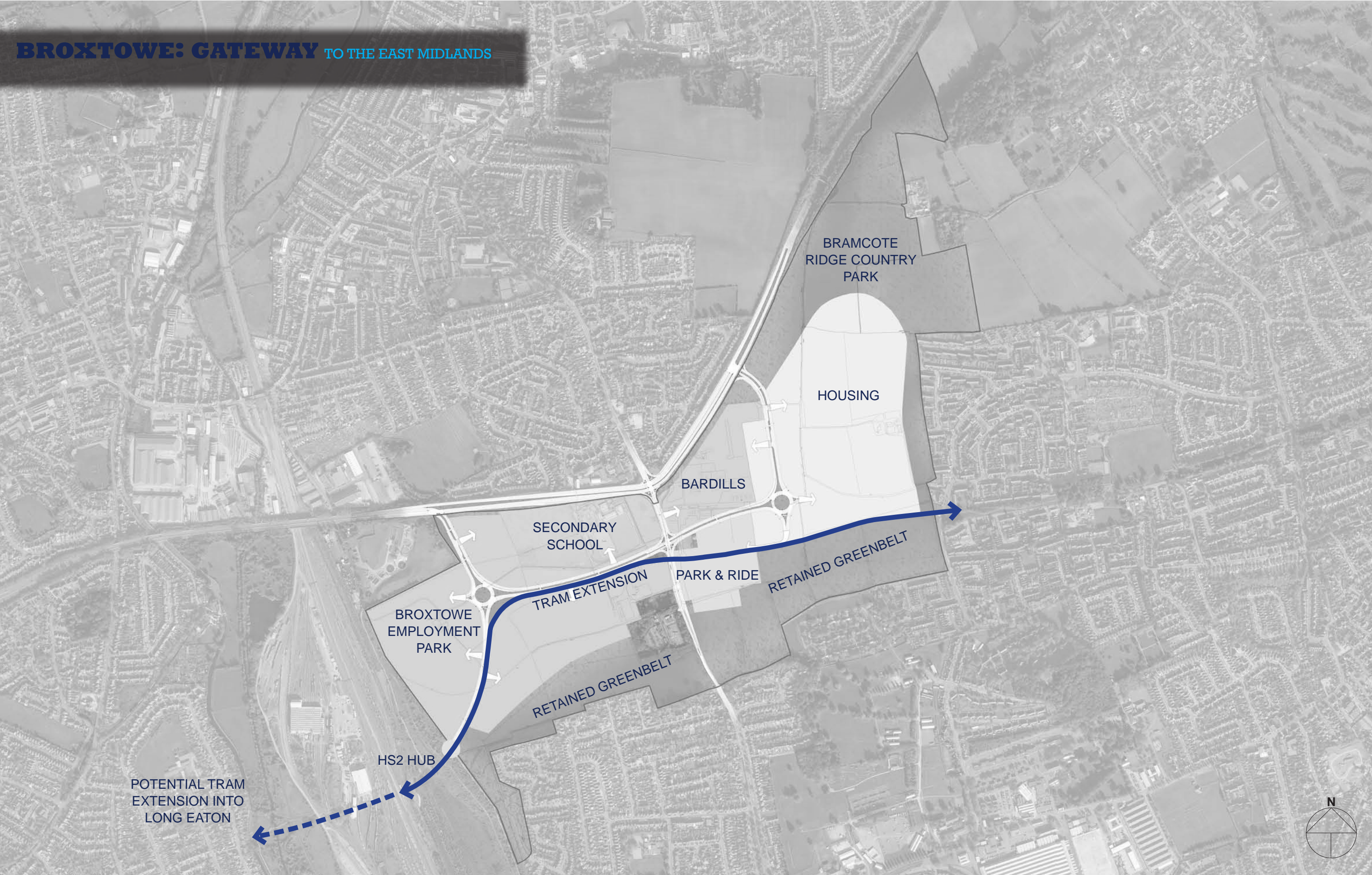
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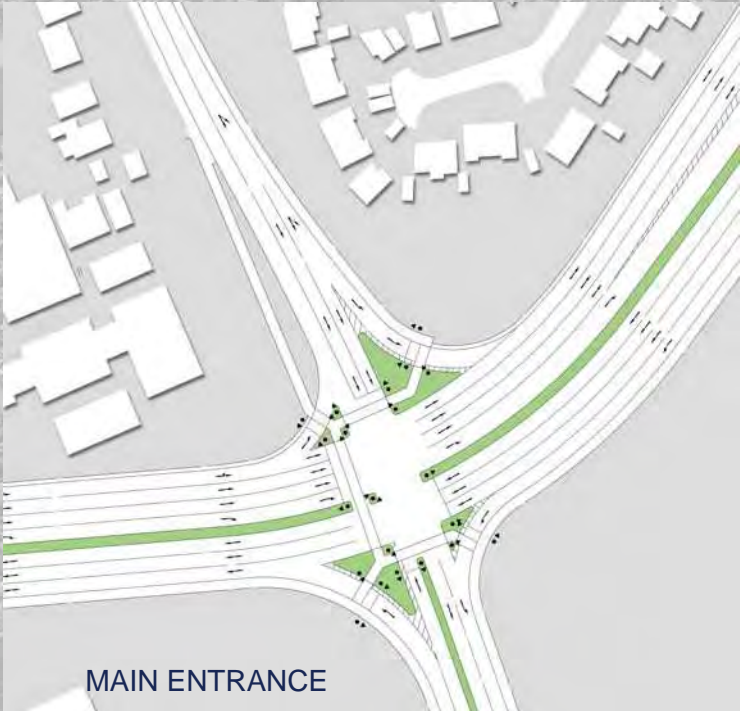
DELIVERY

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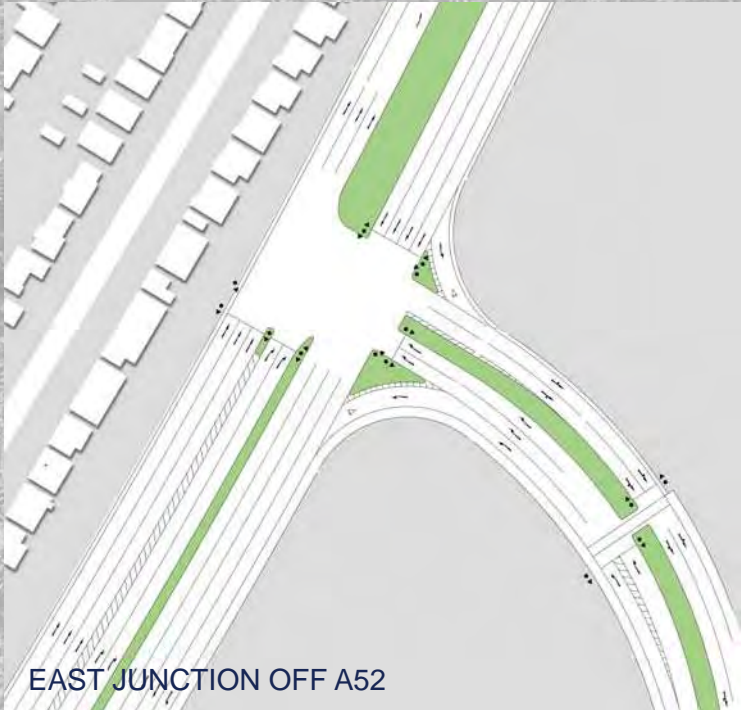


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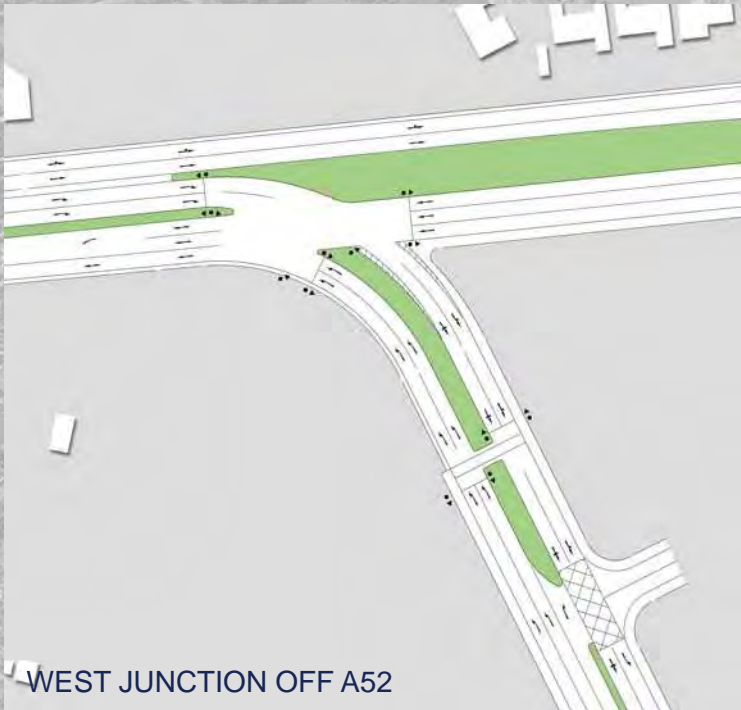
MAIN ENTRANCE



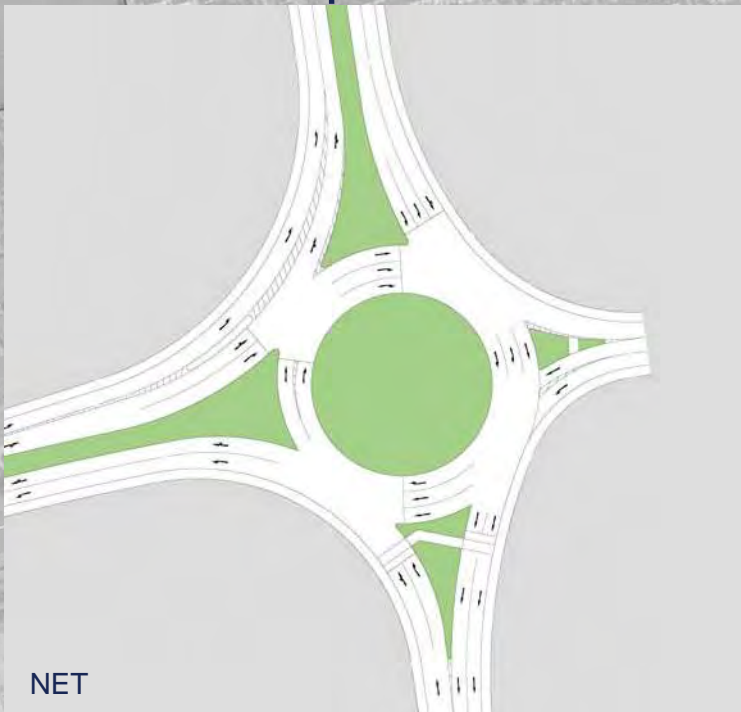
EAST JUNCTION OFF A52



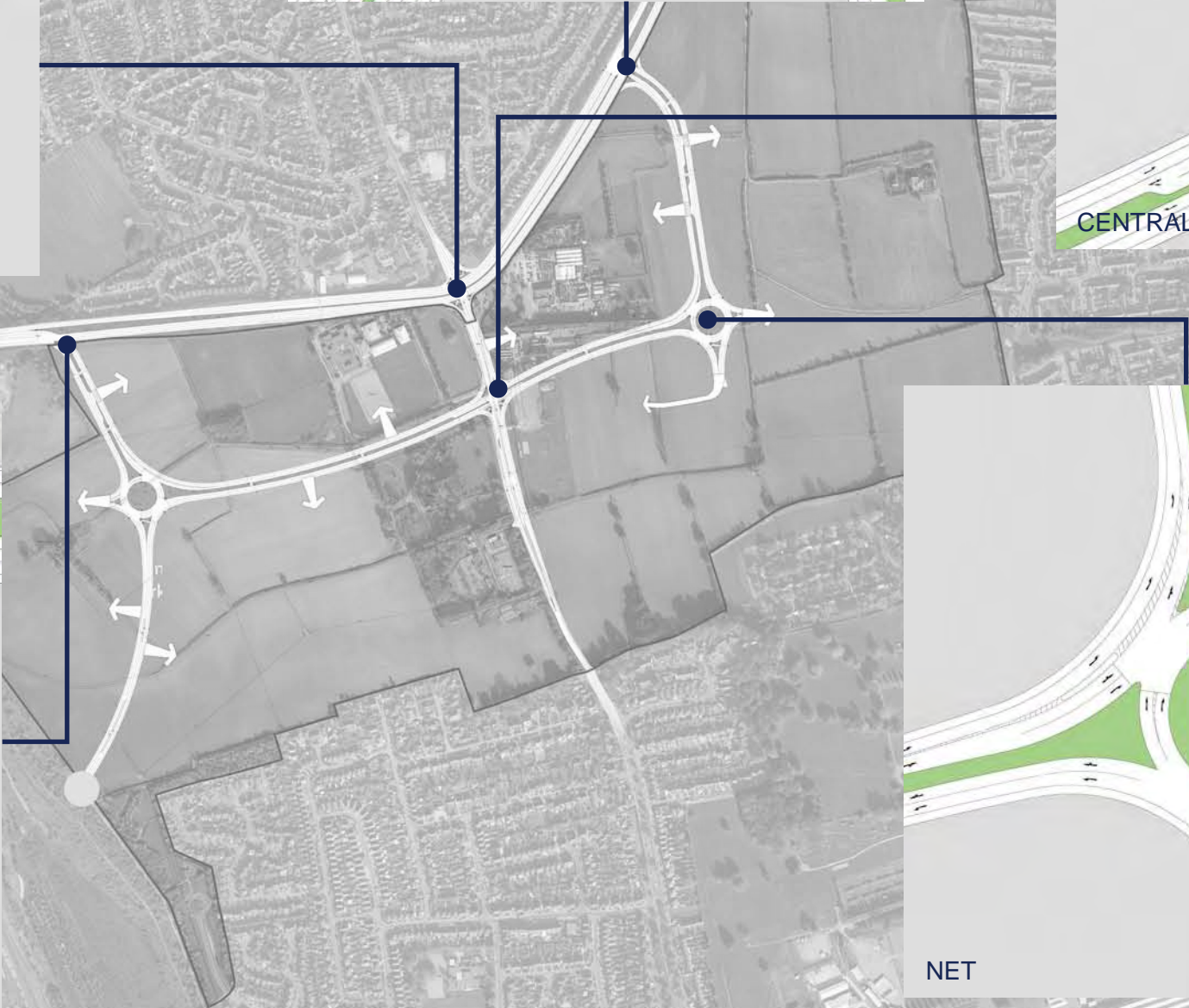
CENTRAL JUNCTION



WEST JUNCTION OFF A52



NET



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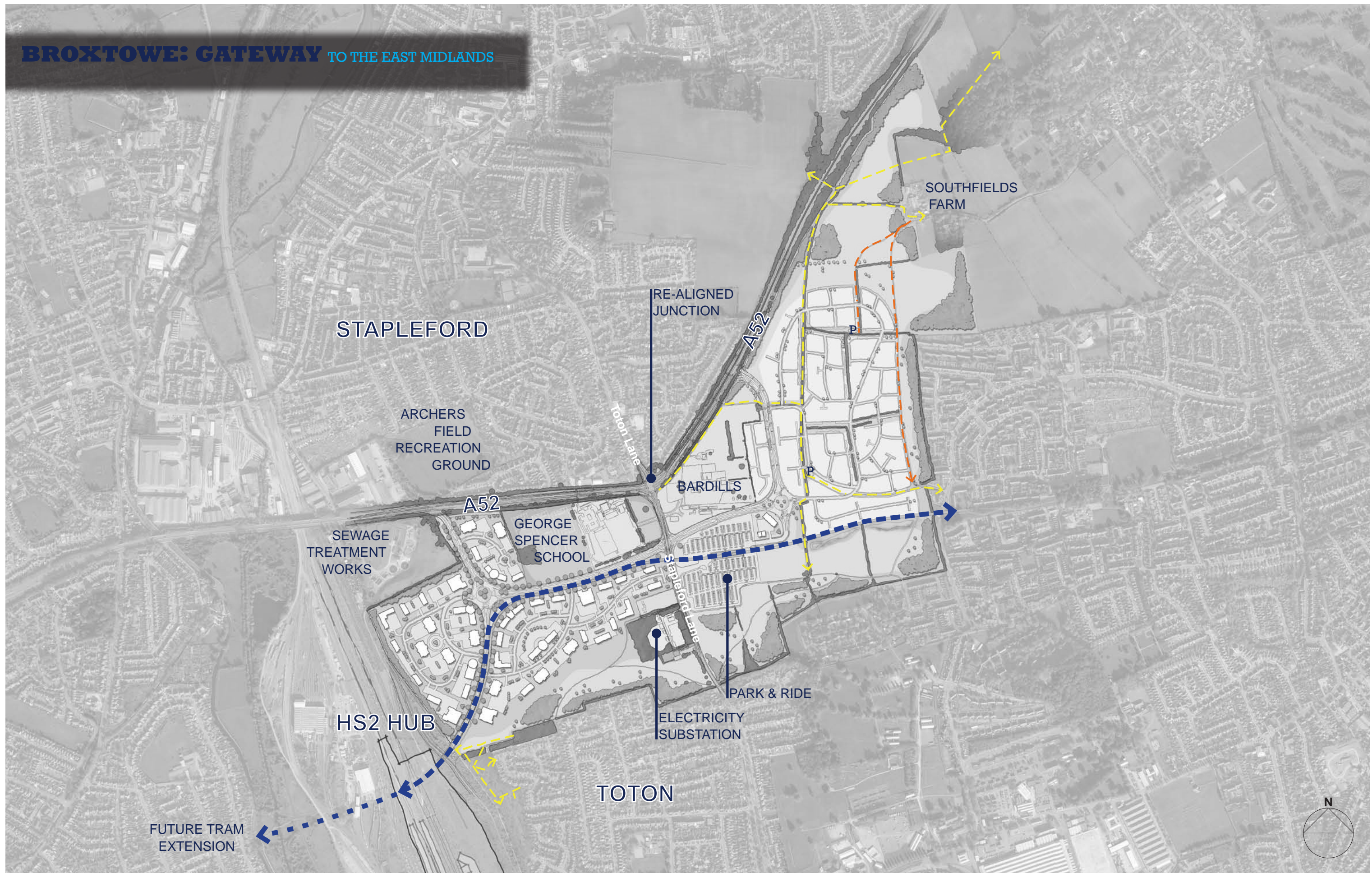
TRAFFIC

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BROXTOWE: GATEWAY TO THE EAST MIDLANDS



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Bloors
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Toton

CAPACITY PLAN

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March 2014



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environmental assessment
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TOTON: STRATEGIC LOCATION FOR GROWTH

AN ALTERNATIVE RESPONSE TO THE UNIQUE OPPORTUNITIES PRESENTED BY HS2

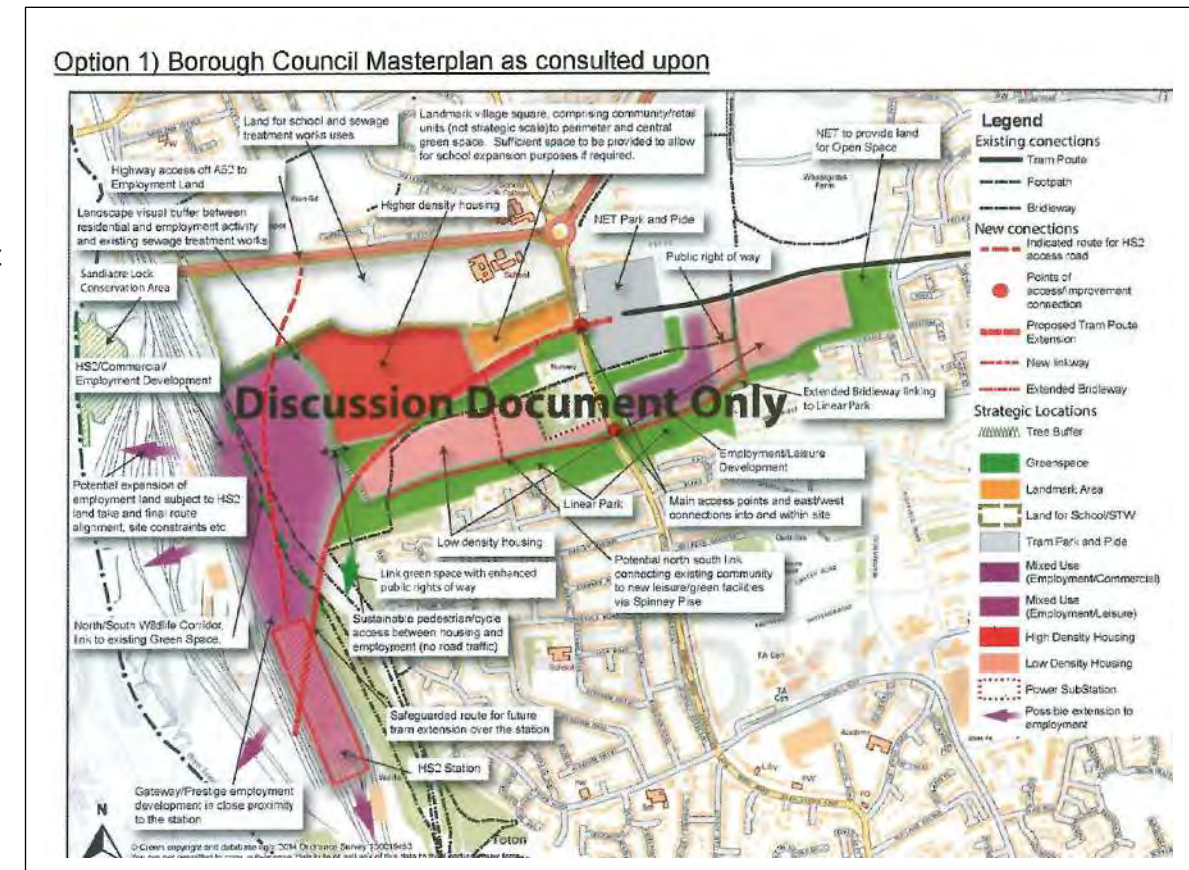
THE VISION:

"TO ESTABLISH A MASTERPLAN THAT IS BOLD AND AMBITIOUS IN ITS SCALE AND QUALITY.

TO PROVIDE THE FRAMEWORK TO DELIVER A WORLD-CLASS DEVELOPMENT OF REGIONAL SIGNIFICANCE IN RESPONSE TO THE UNIQUE LOCATIONAL OPPORTUNITIES AT TOTON, PRESENTED BY HS2, MAINLINE RAIL CONNECTIONS, THE TRAM AND STRATEGIC ROAD LINKS"

BACKGROUND:

- The Broxtowe Core Strategy allocates land at Toton as a strategic location for growth with minimum land use requirements for employment, housing and open space. The precise mix and scale of development and the precise site boundaries and disposition of uses are still to be determined.
- The Council have recently consulted on a potential approach to the masterplanning of the Toton site. This approach, adjusted to reflect constraints identified by HS2 and the Environment Agency, would deliver just 10-15 ha of land for commercial uses - with 500-750 new homes, together with a local centre, primary school and open space.



CONCERNS WITH THE EMERGING APPROACH:

- Oxalis Planning have raised concerns with this emerging approach. In particular our concern is that it is not capable of providing sufficient space for commercial development, in the right location, to deliver a world-class development of regional significance. The main approach to the HS2 Station would be through a high density housing area and the land allotted for commercial use would not be able to deliver a scheme which would give justice to the unique opportunity presented at Toton.
- Indeed the level of commercial development is relatively insignificant even compared to standard city scale business park locations, and is in very stark contrast to other existing and proposed locations around high-speed rail stations.
- Oxalis have previously suggested that the approach at Toton should be as ambitious as the approach at the proposed HS2 hub at Solihull. The Borough Council have responded by stating that:

“The emerging approach at Toton contains approximately half of the proposed development area of land adjacent to Solihull, which is comparable to the role and function of the two urban and economic areas”.

Oxalis consider that this approach seriously undersells the collective position of Nottingham and Derby (to which the Toton scheme should respond). It should be noted that Birmingham has two very major proposals in response to HS2, at Solihull and in the centre of Birmingham. Furthermore, it is misleading to suggest the scheme is half the size of Solihull. The amount of commercial space proposed at Solihull is around 45 ha, which compares to 10-15 ha in the Council's emerging Toton plans.

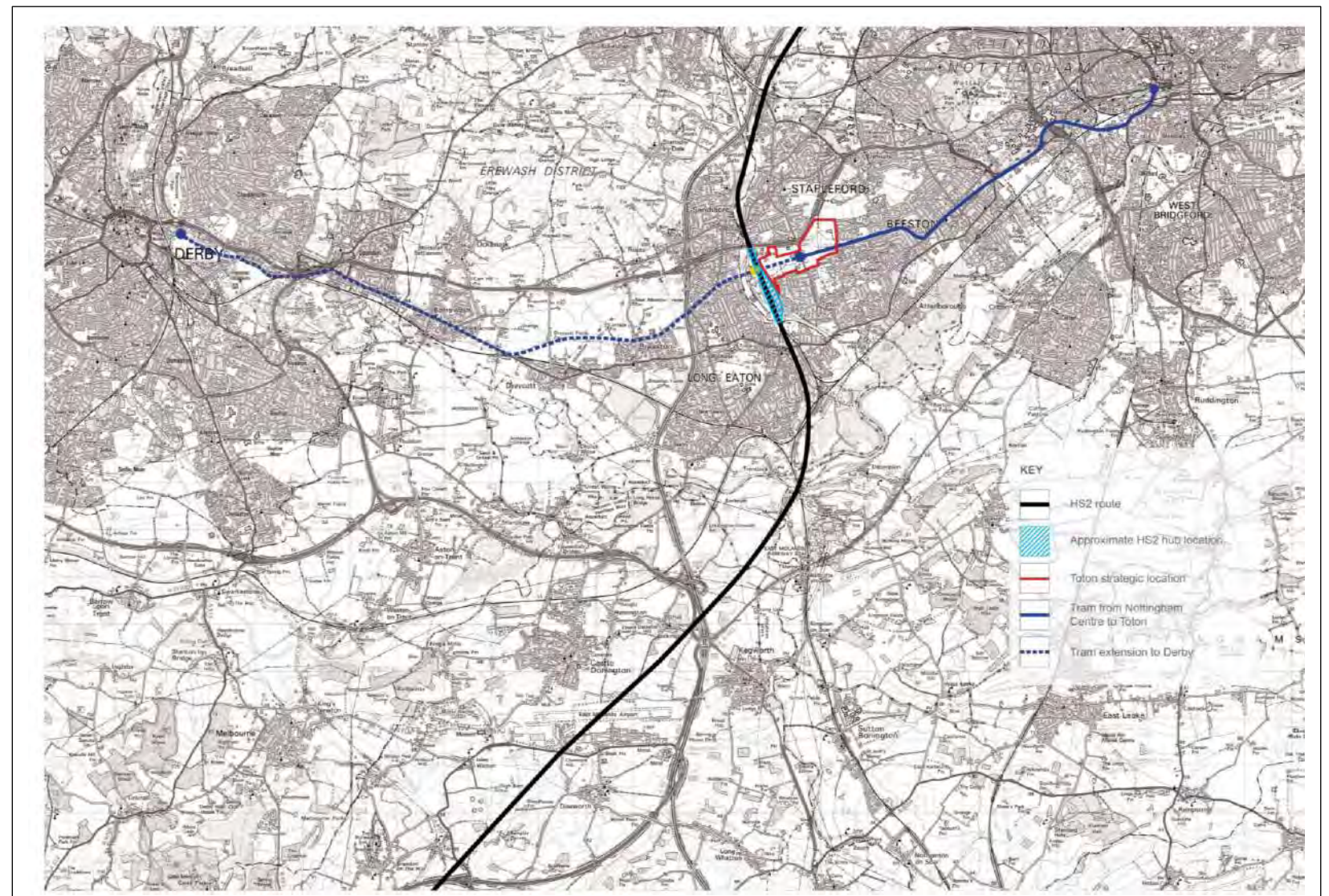
AN ALTERNATIVE APPROACH:

- Oxalis believe that the Masterplan for the Toton site should be driven by the need to deliver an appropriate commercial response to the opportunities presented by HS2. This is a unique location with, not only HS2, but excellent transport links by rail, tram and road. The economic opportunities should be maximised and a specific response to HS2 planned.
- Whilst the precise nature of commercial development can only be determined by future market demand, the planning of the site should not, in anyway, constrain the potential.
- This location has the potential to deliver significant economic benefits in terms of direct investment and job creation; and indirect 'ripple' effect for the economies of the East Midlands.
- Done well, and with ambition, this could help to reinforce the role of Nottingham and Derby.

ENVIRONMENTAL IMPACT:

- Whilst this location presents significant commercial opportunities, there are also important environmental matters that will need to be addressed. Notably in relation to Green Belt, access to open space and transport.
- Oxalis believe that an alternative Masterplan approach can help to deliver more publicly accessible open space, particularly in the most sensitive locations. An alternative approach can also help to address the serious traffic congestion issues that currently affect the immediate area.

Strategic Location



AN ALTERNATIVE MASTERPLAN

- Oxalis have prepared alternative Masterplan options for Toton, which are intended to stimulate discussion.
- The approach in each options seeks to accord with the Core Strategy minimum land use requirements, but to maximise the amount of commercial space immediately adjacent to HS2 and to provide a substantial new Country Park. The Vision is for this area to become a regional destination, with high quality buildings and a well landscaped setting. It should be world-class in its quality and ambition.
- The scale of development proposed is not exceptional. Indeed compared to other locations the amount of commercial space is relatively small, and there may be a case to seek to further increase the scope for commercial space.
- The table below compares the Oxalis plan for Toton to the completed scheme at EuraLille and the proposals at the HS2 Station at Solihull. Neither location is directly comparable, but both provide a useful guide to what Toton could aim for. Solihull is similar because of its edge of City location in the Green Belt and its wider road and rail links. It differs though because there is already the well-established NEC and Birmingham Business Park adjacent to it and as such, it does not need to include exhibition and conference space, hotels or significant office space. EuraLille is similar in that Lille is a similar City scale to Nottingham and has provided the opportunity for the City to establish a regional scale exhibition/conference centre within associated hotels. It differs however because it is a central location where retail became an important component, such retail content would not be appropriate at Toton.

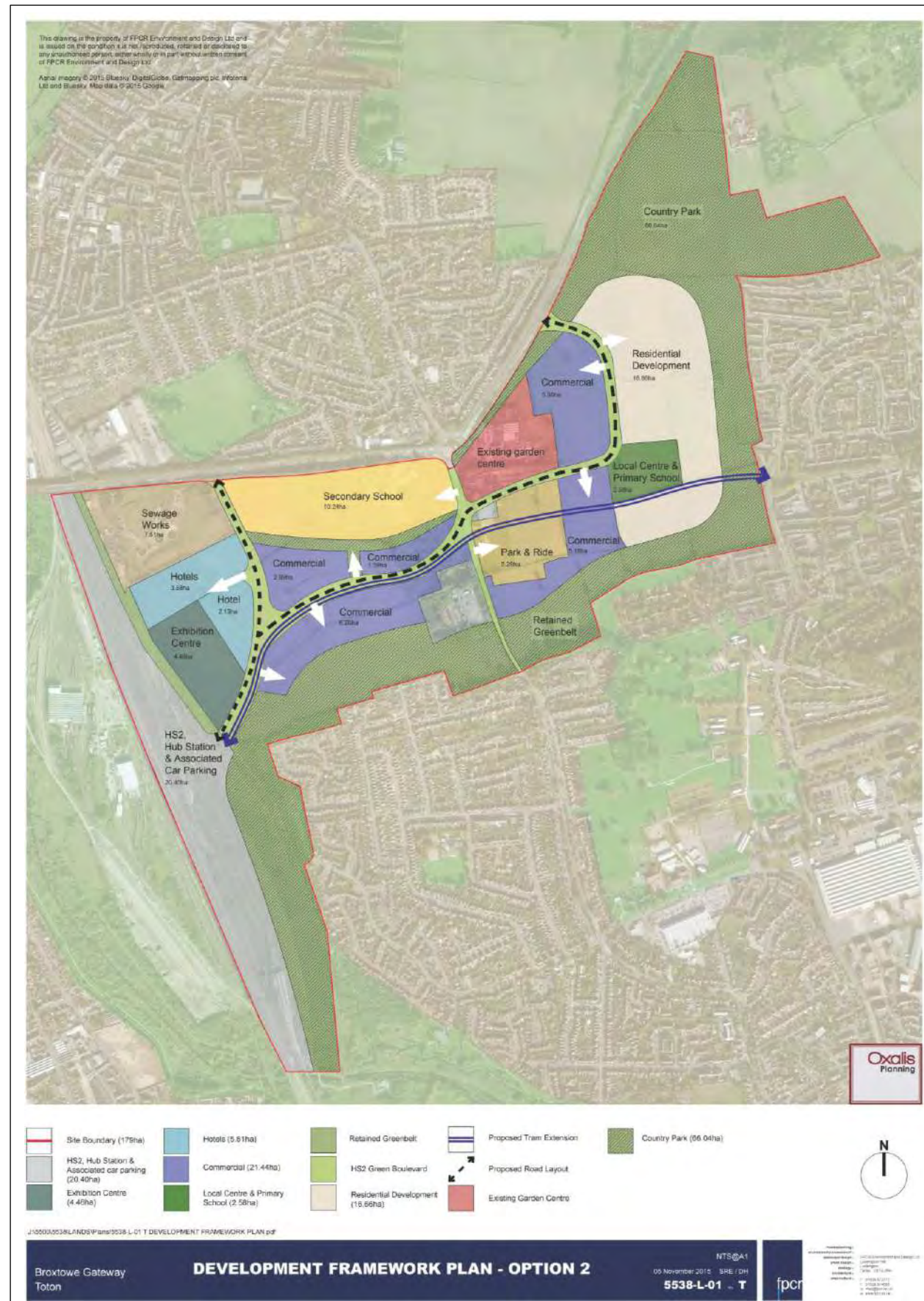
Name	Employment	Residential	A1-A5	C1	Conference Centre	School	D2	Green Space	Station
Solihull Interchange	45 ha (inc. Light industrial/Innovation/ High Tech R&D)	26ha							15ha
EuraLille	10.4ha light industrial 30ha – offices	700 units	5ha Shops	4.1ha X 3 Hotels	2ha 4,000 delegates		1.8ha Theatre	10ha	
Broxtowe Gateway (Oxalis proposal)	15 - 20ha B1	500 – 600 units 15 - 20ha	1ha Local Retail	6ha X 3 Hotels	4 - 6ha 6,000 delegates	1.5ha (Primary)		60 - 70ha	15ha

The Aerial Visulisation image tries to give an impression of what the Toton site might accommodate in accordance with the illustrative Masterplan. It uses imposed images of existing sites to demonstrate the land take of different uses.



MASTERPLAN FOR DISCUSSION – OPTION TWO

The Aerial Visulisation image tries to give an impression of what the Toton site might accommodate in accordance with the illustrative Masterplan. It uses imposed images of existing sites to demonstrate the land take of different uses.



Broxtowe Part 2 Local Plan



Broxtowe
Borough
COUNCIL

Agent

Please provide your client's name TAYLOR & BURROWS PROPERTY

Your Details

Title	Mr <u>Mrs</u> Miss Me Other:
Name	██████████
Organisation (if responding on behalf of the organisation)	Phoenix Planning (UK) Limited
Address	██████████ ██████████ ██████████ ██████████
Postcode	██████████
Tel. Number	██████████
E-mail address	██

Comments should be received by 5.00pm on Friday 3rd November 2017

If you wish to comment on several policies, paragraphs, or sites, please use a separate form for each representation.

If you would like to be contacted by the Planning Policy Team regarding future consultations.

Please tick here ✓

Please help us save money and the environment by providing an e-mail address that correspondence can be sent to: As above

For more information including an online response form please visit:

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Please return completed forms to:

Planning Policy, Legal and Planning Services, Foster Avenue, Beeston, Nottingham NG9 1AB

For more information: Tel: 0115 917 3452, 3448, 3468 or 3015 E-mail: policy@broxtowe.gov.uk

Question 1: What does your comment relate to? Please specify exactly

Document	Policy number	Page number	Policy text/ Paragraph number
Part 2 Local Plan	Policy 1: Flood Risk		
	Policy 2: Site Allocations		
	Policy 3: Main Built up Area Site Allocations	Page 24 - 46	Policy 3 as a whole
	Policy 4: Awsworth Site Allocation		
	Policy 5: Brinsley Site Allocation		
	Policy 6: Eastwood Site Allocation		
	Policy 7: Kimberley Site Allocations		
	Policy 8: Development in the Green Belt		
	Policy 9: Retention of good quality existing employment sites		
	Policy 10: Town Centre and District Centre Uses		
	Policy 11: The Square, Beeston		
	Policy 12: Edge-of-Centre A1 Retail in Eastwood		
	Policy 13: Proposals for main town centre uses in edge-of-centre and out-of-centre locations		
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	Policy 15: Housing size, mix and choice		
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	Policy 19: Pollution, Hazardous Substances and Ground Conditions		
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	Policy 22: Minerals		
	Policy 23: Proposals affecting designated and non-designated heritage assets		
	Policy 24: The health impacts of development		
	Policy 25: Culture, Tourism and Sport		
	Policy 26: Travel Plans		
	Policy 27: Local Green Space		
	Policy 28: Green Infrastructure Assets		
	Policy 29: Cemetery Extensions		
	Policy 30: Landscape		
	Policy 31: Biodiversity Assets		
	Policy 32: Developer Contributions		
Policies Map			
Sustainability Appraisal			
Other (e.g. omission, evidence document etc.)			

Question 2: What is the issue with the Local Plan?

Do you consider this paragraph or policy of the Local Plan to be: <i>(please refer to the guidance note at for an explanation of these terms)</i>		Yes	No
2.1	Legally compliant		
2.2	Compliant with the duty to co-operate		
2.3	Sound		X

Question 3: Why is the Local Plan unsound? Please only answer this question if you answered 'No' to 2.3 above

If you think this paragraph or policy of the Plan is not sound, is this because:	
It is not justified	X
It is not effective	X
It is not positively prepared	X
It is not consistent with national policy	X

Your comments

Please give details of why you consider this part of the Local Plan is not legally compliant, is unsound or does not comply with the duty to co-operate. Alternatively, if you wish to support any of these aspects please provide details. Please be as precise as possible. Continue on an extra sheet if necessary.

The Plan seeks to reduce the housing requirement as set out within the Adopted Core Strategy for Eastwood and allocate more housing within the main urban area. Objection is raised towards this approach. It is considered essential that Eastwood maintains a continual supply of housing and ensure that viable sites are released that can provide appropriate market and affordable housing to meet the needs of the area. Eastwood is a highly sustainable location which requires growth in order to sustain and improve local facilities including a deteriorating town centre badly in need of the investment new residential areas around the town can bring. The release of appropriate green field sites to meet the needs identified within the Adopted Core Strategy will bring forward much needed housing for Eastwood and enable the provision of contributions towards local infrastructure.

It is noted that Eastwood is classified as a low market area which reduces viability and the opportunities for securing appropriate S106 contributions. However, sites such as the Wades Printers site, are located within a higher market area than the remainder of Eastwood and as will be demonstrated within our submission regarding policy 6, our site can bring forward substantial local community benefits including the provision of a significant area of public open space.

Policy 3 identifies 8 sites proposed to be allocated for housing purposes within the main urban area. Concerns are raised with regards to the deliverability of a number of these sites within the plan period. The table below identifies my clients concerns and key constraints on each of the sites which may affect deliverability.

SITE	NUMBER OF DWELLINGS	ISSUES
Chetwynd Barracks	500	<ul style="list-style-type: none"> - A Listed building and memorial garden is present on site which may impact upon land availability. - The site holds historical importance with regards to the military. This issue needs further consideration prior to redeveloping the site. - Previous industrial uses present and therefore potential for contamination within the site. - Significant level changes across the site which may impact upon density. - Detailed masterplan required to show that the constraints have been taken into consideration and that this site can accommodate 500 dwellings. - It is noted that the SHLAA identifies the delivery of 500 dwellings within the 11-15year period. It is considered ambitious to expect 500 dwellings to be completed within a 5-year period. With the constraints identified and the military processes that would have to be undertaken before the land could be released to a developer, it is considered that this allocation will be delivered over a longer period than the current plan period.
Toton (Strategic Location for Growth)	500 dwellings	This site consists of a Strategic Location for Growth. The allocation proposes a mixed-use development which will expand beyond the plan period. The wider allocation includes the provision of 500 dwellings plus retail, business use, open space, transport improvements and community facilities. Concern is raised regarding the deliverability of the housing proposed within the plan period. Within the SHLAA 300 dwelling are projected to be delivered between 2018-2023. This is considered to be extremely doubtful given the uncertainties that still surround this major infrastructure project. Question is raised as to the deliverability within these time frames with lead in times for infrastructure etc.
Bramcote (East of Coventry Lane)	300	<ul style="list-style-type: none"> - This is a green belt site and the proposal will have a significant landscape impact. It is considered that there are less sensitive sites available in Eastwood which would enable a distribution more in line with the with Adopted Core Strategy. - Significant local objection to the release of this green belt site including the Bramcote Neighbourhood Forum. - The site lies adjacent to a landfill site. Potential for contamination issue that does not appear to have been fully evaluated. - SA identifies land ownership issues as a constraint. Question is raised with regards to deliverability within the plan period. The requirement for no dwellings to be occupied before the replacement school is completed, creates a difficult scenario for builders who need to see cash flowing in as well as out . This is likely to impact upon deliverability within the plan period.
Stapleford (West of Coventry Lane)	240	<ul style="list-style-type: none"> - This is a green belt site and its release in conjunction with Fields Farm and the Bramcote (East of Coventry Lane) will cumulatively have a significant detrimental impact upon the purposes of the green belt and should not be supported. There are less sensitive

		<p>green belt sites available within Eastwood that would align with the Core Strategy and should be released before this site.</p> <ul style="list-style-type: none"> - Question is raised with regards to the sites sustainability with residents having to rely heavily upon the car to access the key services and facilities.
Severn Trent (Lilac Grove)	150	<ul style="list-style-type: none"> - Ecological impacts of development upon Beeston Canal Wildlife Site. - Potential contamination issues from the land fill site. This issue does not seem to have been fully considered
Beeston Maltings	56	<ul style="list-style-type: none"> - The site formed part of a housing allocation within the 2004 Adopted Local Plan and site has been cleared and demolished since 2012. Question is raised with regards to the deliverability of this site within the plan period as this site has not come forward to date. - Development could result in potential harm to an area including non-designated heritage assets in Dovecote Lane area. - The SHLAA identifies that there are on-going discussions with Network Rail about bringing this site forward and that there are some legal issues over this site. It is understood that some freight operators have objected to the proposal and Network Rail are working to resolve this. It is considered that there is uncertainty about the delivery of this site and should not be included within the land supply for the plan period.
Beeston Cement Depot	21	<ul style="list-style-type: none"> - Potential contamination issues which may impact upon deliverability

It is clear that whilst that Local Plan seeks to provide more housing within the main urban area than identified within the Core Strategy, there are constraints to a number of the sites allocated which could preclude the sites from coming forward and delivering the full housing needs for the Borough. It is another example of the Council relying on old ideas and not fully engaging in the adoption of a new positive approach to identifying housing land.

The Council's approach seems to be to turn its back more on the needs of Eastwood even though that may mean releasing more sensitive green belt sites in Bramcote

It is clear from viewing the Local Plan Publications Version and the accompanying Site Selection Document that the justification for release more housing within the main urban area than within Eastwood is that the areas such as Toton, Bramcote and parts of Stapleford are higher marketing areas and accordingly will enable the LPA to secure more S106 benefits. Objection is raised to this approach as the S106 provisions secured will benefit the already affluent and well provided for areas of Bramcote and Toton. By failing to release more land within Eastwood, leads to a reduction in the ability to secure funding for the more deprived settlement of Eastwood and build capacity for this area.

There are also a number of sites included within the housing land supply calculation as identified by the SHLAA. Our comments on these are as follows:

<i>SITE</i>	<i>NUMBER OF DWELLING</i>	<i>ISSUES</i>
Works, Bailey Street, Stapleford	15 dwellings	<ul style="list-style-type: none"> - Outline consent approved in 2012 which has now lapsed and has not been renewed. No certainty that this site will come forward for development. - Contamination issues and adjacent existing uses may impact upon the marketability of this site and therefore question is raised with regards to its deliverability. - Site should be removed from housing supply
Wadsworth Road, Stapleford	11 dwellings	<ul style="list-style-type: none"> - School site is now occupied by the Haven Group and unlikely to come forward for housing for several years, if at all. This site should be removed from the SHLAA as the site is not deliverable.

It is clear that there are significant issues with a number of the sites both within the allocations and within the SHLAA that may affect deliverability within the plan period. In this regards, it is considered necessary to release additional land within the Borough in order to ensure that the housing requirement is met in full.

As this and other objections will show, there is considerable concern that the policies reflect the situation as the Council would like to see it viewed in terms of site delivery, rather than as it will be. Therefore, the Plan fails the tests of soundness as:

1. Positively Prepared: To meet the test the plan must be able to show it is based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, in a manner consistent with achieving sustainable development. The sites selected, and the many previously permitted, do not show a positive approach to achieve the delivery claimed within the next 5 years let alone the immense step change that the Trajectory in Table 4 is suggesting will occur. The Council appear to be relying on sites that have failed in the past which indicates that the Plan is not positively prepared.

2. Justified: The sites highlighted above are not fully evaluated and the belief that they will deliver in the manner suggested is not justified.

3. Effective: The fact that the issues raised above, that sites will not deliver as forecast, means that the Plan will fail to be effective and deliver the growth required.

4. Consistent with national policy: The NPPF (Para 14) requires local planning authorities should positively seek opportunities to meet the development needs of their area. It goes on to seek to “boost significantly the supply of housing” (para 47) . However, as this and other objections will show, that is not the approach the council is talking, relying instead on sites where deliverability is questionable.

Question 4: Modifications sought

Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. Continue on an extra sheet if necessary.

The council should take a fresh look at potential new sites where deliverability has not already failed and consider sites that do not have the deliverability and viability issues that some of the current sites face.

It is considered that additional housing should be released within Eastwood in order to provide a plan that is more in compliance with the Adopted Core Strategy and to ensure that sufficient developable and deliverable sites are allocated to meet the full housing needs for the plan period. It should focus on the more marketable areas of Eastwood and support this areas growth and regeneration in a more positive fashion.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. **After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

Question 5: Public Examination Attendance

If your representation is seeking a modification, do you consider it necessary to participate at the public examination?

Yes, I wish to participate at the public examination

✓

No, I do not wish to participate at the public examination

If you wish to participate at the public examination, please outline why you consider this to be necessary

There are issues of how far the Plan still aligns with the Core strategy that it claims to rely on, although it's approach appears at odds with that document.

The growth and regeneration of Eastwood is a matter which would benefit from a roundtable debate on the merits of various sites and alternatives.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the public examination.

Details

Agent	
Please provide your client's name	
Your Details	
Title	Mr
Name	Keith Trussell
Organisation (If responding on behalf of an organisation)	
Address	<div>██████████</div> <div>██████████</div> <div>██████</div>
Telephone Number	
Email Address	<div>██████████████████</div>
Would you like to be contacted regarding future planning policy consultations?	Yes
If you wish to comment on more than one issue you will need to submit a form for each representation.	

Policy relates to

Please specify what your comment relates to					
Policy number	Page number	Policy text/ Paragraph number	Policies Map	Sustainability Appraisal	Other (e.g. omission, evidence document etc.)
26: Travel Plans					

Question 1: What does your comment relate to? Please specify exactly

Question 2

Question 2: What is the issue with the Local Plan?	
Do you consider this paragraph or policy of the Local Plan to be:	
2.1 Legally compliant	Yes
2.2 Compliant with the duty to co-operate	Yes
2.3 Sound	No

Question 3

Question 3: Why is the Local Plan unsound? Please only answer this question if you answered 'No' to 2.3 above	
If you think this paragraph or policy of the Plan is not sound, is this because:	
It is not justified	No
It is not effective	Yes
It is not positively prepared	Yes
It is not consistent with national policy	No

Additional details

Please give details of why you consider this part of the Local Plan is not legally compliant, is unsound or does not comply with the duty to co-operate. Alternatively, if you wish to support any of these aspects please provide details.

The Local Plan delineates that all relevant developments require a Travel Plan to be submitted with their application. This is to ensure a comprehensive public transport network is developed to serve each of the developments. Specifically the Opun case study for Chetwynd Barracks sets out the need for a comprehensive development of transport links for bus, cycle and tram travel not only through the development site but also to interlink and improve the same in Toton around Banks Road with the need to connect to the future HS2 Hub.

From the foregoing it may well be that Travel Plans will be developed piecemeal rather than as an overall comprehensive strategy for the wider area covering Stapleford (South) and Toton. Without such an overall strategy the proposals for Chetwynd Barracks aims to improve transport links within the development and in Toton. By excluding Stapleford (South) in such proposals yet again this part of Broxtowe Borough will be ignored to the detriment of the population within its boundaries. One such effect will be with regard to the current basic public transport bus service which in all likelihood will be withdrawn from Stapleford (South) if public transport is improved in Toton as the Service 510 operated by Nottinghamshire County Council Social Services serves both Stapleford (South) and Toton. It is the only daytime hourly service Monday to Saturday that passes through Stapleford (South) and Toton, with no service in the evenings or on Sunday and Bank Holidays. Considering that the NCC will not need to provide the Service 510 in Toton in the event of improved public transport in that locality it will not be a viable operation if it only serves Stapleford (South) and therefore the whole service will be withdrawn. In this scenario Stapleford (South) will become a totally car dependant location.

The western part of Broxtowe South is a centre for local, regional and national development. In the locality there is the largest capacity Park & Ride tram terminus facility for the NET network. Although located close to Bardills Island on the A52 Truck Road allowing for easy personal transport access it is the only point on the NET network not to have a frequent full time bus service to or near to the site. The only bus service is the subsidised Service 510 described above so that bus travel from the wider area including Long Eaton, and surrounding villages is not possible. A local bus service network connecting these locations would need, in part, to pass through Stapleford (South) and thus give the residents a reasonable opportunity to travel by bus out of the area as well as better connection with the tram network. Stapleford (South) cannot support a daytime and evening 7 day bus service in isolation, such a service can only be viable if it serves many other locations along its route. As an example the Trent Barton Service 20/21 travels between Heanor and Nottingham serving communities of Shipley, Ilkeston, Kirk Hallam, Trowell, Stapleford (North) and Bramcote (part).

In considering the overall traffic plan for Chetwynd Barracks and Toton this plan should also incorporate Stapleford (South). In my previous submissions I have pressed for changes to Banks Road to improve traffic flow through the area and enable a comprehensive road network suitable for bus services to be created. At present Banks Road is a long cul-de-sac and does not allow for proper use of the roadway for the benefit of the wider community. I have proposed that Banks Road should be extended into the proposed residential development area west of Stapleford Lane to be developed by Peveril Homes. The fact that Banks Road may currently be considered only as a road to serve the existing housing along its length and not a thoroughfare can no longer be a valid stance given that the Opun case study envisages Banks Road to be one of the main accesses to the HS2 Hub and associated proposed commercial developments.

The HS2 Hub will be a regional facility where large numbers of persons will travel to from the wider East Midlands area including Nottingham and Derby. A comprehensive network of public transport will be created to supplement personal transport by way of the extension of the tram network into the hub together with new bus routes. However with regard to the latter direct access to HS2 will be available by new access roads directly from a new junction on the A52 as well as a route via Bessell Lane on the edge of Stapleford. There will be no need for the bus services to pass through Stapleford (South) and therefore the residents of this

	<p>area will not benefit from these improvements in public transport. However a precedence for a long distance major hub bus service to provide a local service along its length is set by the Trent Barton Skylink bus route from Nottingham to East Midlands Airport running 24 hours 7 days a week which does provide a local service along its route. For example this service provides a local service for communities along Queens Road and Queens Road West, Beeston and By Pass Road, Chilwell and is also advertised as a 'fast link' service between Nottingham and Long Eaton.</p> <p>The presence of the tram service, the proposed development of the HS2 Hub together with associated commercial developments and proposed housing on Chetwynd Barracks, Chilwell, west of Stapleford Lane, Toton and Fields Farm, Stapleford create a perfect scenario for an area wide overarching transport policy within the districts of Toton, Stapleford, Bramcote (part) and Trowell together with ancillary projects to enhance and improve the whole standing of the areas and provide a public transport system that benefits all the communities to the best advantage on the back of the regional and national infrastructure developments that these locations will host. It is of paramount importance that local improvements be planned for as a result of the vast advantages created otherwise Stapleford will loose out and continue to deteriorate in the shadow of the infrastructure developments that the location will host.</p>
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Question 4

Question 4: Modifications sought	
Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this modification will make the Local Plan legally compliant or sound.	An overall Travel Plan policy for the whole of the western part of Broxtowe South is vital for comprehensive and available public transport to be available to all communities to benefit rather than the envisiaged piecemeal approach of locations in isolation. Only such an overall plan will make the Local Plan sound.

Question 5

Question 5: Public Examination Attendance	
If your representation is seeking a modification, do you consider it necessary to participate at the public examination?	No
If you wish to participate at the public examination, please outline why you consider this to be necessary	

Broxtowe Part 2 Local Plan



Broxtowe
Borough
COUNCIL

Agent

Please provide your client's name	
-----------------------------------	--

Your Details

Title	<input checked="" type="radio"/> Mr <input checked="" type="radio"/> Mrs <input type="radio"/> Miss <input type="radio"/> Ms <input type="radio"/> Other:
Name	TREVER AND PATRICIA BROWN
Organisation (if responding on behalf of the organisation)	TOTON LOCAL RESIDENT
Address	[REDACTED]
Postcode	[REDACTED]
Tel. Number	[REDACTED]
E-mail address	[REDACTED]

Broxtowe Borough Council
Planning & Community Development

- 2 NOV 2017

Comments should be received by 5.00pm on Friday 3rd November 2017

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If you would like to be contacted by the Planning Policy Team regarding future consultations.

Please tick here



Please help us save money and the environment by providing an e-mail address that correspondence can be sent to: AS ABOVE

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	Policy 25: Culture, Tourism and Sport		
	Policy 26: Travel Plans		
	Policy 27: Local Green Space		
	Policy 28: Green Infrastructure Assets		
	Policy 29: Cemetery Extensions		
	Policy 30: Landscape		
	Policy 31: Biodiversity Assets		
	Policy 32: Developer Contributions		
Policies Map			
Sustainability Appraisal			
Other (e.g. omission, evidence document etc.)			

Question 4: Modifications sought

Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. Continue on an extra sheet if necessary.

Policy 3b6 (Continued)

It is hoped traffic will be diverted around Toton and direct links to HS2 and M1 will be made avoiding surrounding areas coming through Toton. The suggestions in this document do look promising.

There needs to be an improvement to make Bardilly Island safer.

3b7 GREEN INFRASTRUCTURE

As a local resident who is along the southern boundary of this development (Cleve Ave) it is encouraging to see between Hobgoblin Wood and Toton Fields local Wildlife site it is being suggested a Green Infrastructure Route.

Its good to see what looks like a green corridor horse shoe around existing properties. Equally we are pleased to note no loss of trees which are subject to Tree Preservation Orders and that there will be extensive additional planting.

The green corridor around existing properties will be an asset to residents and wildlife.

Trevor and Patricia Brown.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. **After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

Question 2: What is the issue with the Local Plan?

Do you consider this paragraph or policy of the Local Plan to be: (please refer to the guidance note at for an explanation of these terms)		Yes	No
2.1	Legally compliant		
2.2	Compliant with the duty to co-operate		
2.3	Sound		

Question 3: Why is the Local Plan unsound? Please only answer this question if you answered 'No' to 2.3 above

If you think this paragraph or policy of the Plan is not sound, is this because:	
It is not justified	
It is not effective	
It is not positively prepared	
It is not consistent with national policy	

Your comments Please, note the comments on this form are general observations from us as Totm residents for 36 years.

Please give details of why you consider this part of the Local Plan is not legally compliant, is unsound or does not comply with the duty to co-operate. Alternatively, if you wish to support any of these aspects please provide details. Please be as precise as possible. Continue on an extra sheet if necessary.

POLICY 3.2 TOTON (Strategic Location for Growth)

I am concerned that the development of the area will condense the housing to the point where apartments/flats may be considered. Whilst we agree affordable housing is required the architecture of such housing needs to be in keeping with the local area. Locally similar housing alongside the embankment in Nottingham is an example to what can be achieved. The area certainly does not need more than two floors including the ground floor. Its hoped when plans for properties have been finalised that local residents will have a chance to comment before planning is passed.

POLICY 3b6 TRAFFIC/TRANSPORT/CONNECTIVITY

The transport network in the area needs very careful detailed planning.

Continued on Page 4.

Question 5: Public Examination Attendance

If your representation is seeking a modification, do you consider it necessary to participate at the public examination?

Yes, I wish to participate at the public examination

No, I do not wish to participate at the public examination



If you wish to participate at the public examination, please outline why you consider this to be necessary

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the public examination.

Guidance Note:

Please complete a **separate form** for each representation you wish to make.

'Legally Compliant':

If your response relates to **the way in which the plan has been prepared**, then this is likely to relate to whether it or not it is '**Legally Compliant**'. To be '**Legally Compliant**', the Local Plan has to be prepared in accordance within the 'Duty to Cooperate' and legal and procedural requirements. These are set out by legislation in the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). If you think that we have not met the legal requirement in the preparation of the Local Plan, please use the response form to tell us what we have not done or what we have done incorrectly.

'Compliant with the Duty to Co-operate':

If your response relates to **the way in which we have worked with other authorities** then this is likely to relate to the '**Duty to Co-operate**'.

The 'Duty to Co-operate' places a legal duty on Local Planning Authorities, County Councils and certain public bodies to engage constructively, actively, and on an on-going basis, to maximise the effectiveness of Local Plan preparation in the context of strategic cross-boundary matters. The 'Duty to Co-operate' is not a duty to agree. However, Local Planning Authorities should make every effort to secure the necessary co-operation on strategic cross-boundary matters before they submit their Local Plan for examination.

'Sound'

If your response is about the **content** of the Local Plan and the strategy it adopts, then it is likely to relate to whether or not the Local Plan is '**Sound**'.

To meet the 'Test of Soundness', the independent Planning Inspector is required to consider whether or not our Local Plan is '**justified**', '**effective**', has been '**positively prepared**', and is '**consistent with national policy**'. You may wish to consider the following before making a representation on the 'Soundness' of our Local Plan:

- '**Justified**': This means that the Local Plan is based upon a robust and credible evidence base. If you think that the evidence doesn't support the choice made in our Local Plan, or there are realistic alternatives, then your comments may relate to whether or not it is 'justified'.
- '**Effective**': This means that the Local Plan will deliver what it sets out to. If you think that what we are proposing in the Local Plan is not deliverable, then your comments may relate to whether or not our Local Plan is 'effective'.
- '**Positively Prepared**': This means the Local Plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.
- '**Consistent with National Policy**': Do you consider that our Local Plan accords with the National Planning Policy Framework (NPPF) and other policies, or includes clear and convincing reasons for doing something different?

For further guidance or assistance, please contact the **Planning Policy Team** on **0115 917 3452** or by emailing **policy@broxtowe.gov.uk**.

Details

Agent	
Please provide your client's name	
Your Details	
Title	Mr
Name	Mike Hill
Organisation (If responding on behalf of an organisation)	
Address	██████████ ██████ ██████
Telephone Number	
Email Address	██████████████████
Would you like to be contacted regarding future planning policy consultations?	Yes
If you wish to comment on more than one issue you will need to submit a form for each representation.	

Policy relates to

Please specify what your comment relates to					
Policy number	Page number	Policy text/ Paragraph number	Policies Map	Sustainability Appraisal	Other (e.g. omission, evidence document etc.)
3: Main Built up Area Site Allocations	76	Policy: 3.2 Land in the vicinity of the HS2 Station at Toton (Strategic Location for Growth)			

Question 1: What does your comment relate to? Please specify exactly
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Question 2

Question 2: What is the issue with the Local Plan?	
Do you consider this paragraph or policy of the Local Plan to be:	
2.1 Legally compliant	Yes
2.2 Compliant with the duty to co-operate	Yes
2.3 Sound	No

Question 3

Question 3: Why is the Local Plan unsound? Please only answer this question if you answered 'No' to 2.3 above	
If you think this paragraph or policy of the Plan is not sound, is this because:	
It is not justified	Yes
It is not effective	Yes
It is not positively prepared	No

It is not consistent with national policy	No
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Additional details

<p>Please give details of why you consider this part of the Local Plan is not legally compliant, is unsound or does not comply with the duty to co-operate. Alternatively, if you wish to support any of these aspects please provide details.</p>	<p>HS2 at Toton.</p> <p>Summary.</p> <p>Neither Broxtowe Borough Council nor East Midlands Councils have justified their support of HS2 or of their development at Toton Sidings & Toton Lane/Stapleford Lane. Neither HS2 Ltd nor the councils have offered mitigation to Toton residents against the noise & nuisance of HS2.</p> <p>1. Economic Impact of HS2.</p> <p>Studies of existing high speed railways in Europe & Japan show that high speed rail does not create new economic activity. Instead, existing economic activity migrates along the line, from smaller cities to larger cities. Businesses in similar sectors cluster together to benefit from the agglomeration efficiencies of sharing workforces. Reducing transport costs, i.e. travel time, encourages this. Regional offices in the smaller cities can be closed. Companies from the larger cities, better resourced & more competitive, can compete with local companies for local customers. HS2 Ltd acknowledges this in its business case; the 'wider economic benefits' are due to agglomeration efficiencies.</p> <p>The journey time savings offered by HS2 are not expected to be large enough to have significant effect. If they did, Nottingham would lose service sector jobs, e.g. financial services to London or Leeds, and medical research to Europe's largest medical research lab, the Francis Crick Institute near Euston.</p> <p>Through poor regional transport or through churn, local industry may migrate to a new cluster formed as part of the development associated with a high speed rail station, drawn by the new development rather than by the station. This is not expected to be significant for Toton, since the region's industry is already located in Nottingham & Derby cities, and classic rail shuttles will run between Toton and Nottingham & Derby.</p> <p>High speed rail stations do not attract company headquarters or R&D centres. Historically, R&D centres are located in the countryside, away from noisy railway stations. Currently, headquarter & R&D functions are sited in large city centres, to attract the youthful workforce that enjoys the city culture.</p> <p>Back office functions relocate from cities to other countries to benefit from lower wage costs, or to other regions with high unemployment to receive grants. Companies moving from London skip the midlands to relocate in the north. When back office functions are relocated, there is no concern to keep them near headquarters.</p> <p>There is no synergy between high speed rail and existing railway companies in the region. High speed rail trains are designed & built abroad. Generally, HS2 will not be built by local constructors. The local HS2 maintenance depot will be at Stavely, Derbyshire, and will employ about 100 people.</p> <p>A high speed rail station and the associated development do not regenerate deindustrialised regions of high unemployment, e.g. Lille or Lyon. Nor do they create new economic activity, e.g. Ebbsfleet in Kent.</p> <p>1.1. Estimates of Job Creation.</p> <p>HS2 Ltd, using a methodology which it acknowledges is applicable to an urban rather than an undeveloped site, and which ignores industry migration along the line, estimates that the Toton station will support 1,500 jobs (including local migration) and 150 houses, requiring only a few hectares. This is an overestimate, but will still only have a marginal effect on employment & housing.</p> <p>KPMG once estimated that HS2 would cost the East Midlands jobs. Its methodology</p>
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has been criticised by experts as being without statistical foundation. Volterra were unable to confirm that HS2 would create new economic activity at Toton, and ignored the empirical evidence described above.

Long Eaton has excellent transport connections with the motorway, airport and railway, yet is not an economic powerhouse.

1.2. Impact of HS2 on Commuting.

With an electrified railway or modern diesel engines, London-Nottingham is expected to take less than 90 minutes. HS2 offer London-Nottingham in about 70 minutes, a saving of only 20 minutes. For comparison, Long Eaton has a London service that currently takes about 90 minutes, running every hour, reducing to around 75 minutes on an electrified line.

While commuters may travel to London on HS2, as they can currently commute from Long Eaton or Nottingham, a mass influx of commuters into the area is not expected.

Commuting range is determined by rail fare, not by travel time. As house prices continue to rise above wages, commuting range will remain capped by wages, rather than increasing with house prices. A London-Nottingham season ticket costs about £10k, plus the 20-30% premium for high speed rail, as charged on HS1 and in Europe. The outer boundary of the London commuter zone is of the order of half of this. As compensation, London wages are higher by an average of around £5k/year, so it will cost most people to work in London rather than locally.

HS2 is not expected to raise house prices in Toton. From HS1, Crossrail and in general, house prices are not raised by a new rail station itself, but by the provision of new amenities as part of the associated development. No new amenities are planned for Toton. However, the noise & nuisance of HS2, during its construction & operation, may cause property blight. The view of many Toton residents is that, if the noise & nuisance become too great, they will have to move away. But, even with compensation, this move may not be affordable.

If Toton does become part of the London commuter zone, both industry and amenities will disappear from the area.

1.3. Loss of Rail Services.

HS2 will not address congestion or add useful capacity. Congestion is on London commuter lines, extending only a few miles out, but all around the city. Lack of capacity is often due to train operators increasing profits and can be reduced by simpler & more effective schemes than HS2.

To encourage the transfer of passengers to HS2, half the current London-Nottingham services will be cancelled, leaving slower trains with less stops. The railways are heavily subsidised and this cost saving is already included in HS2's budget. Unfortunately, these trains are used by local commuters, who are the majority of passengers, and the cancellations do not seem readily replaceable by alternative passenger or freight services.

If Nottingham were to lose some of its commuting workforce, its economy would be reduced. Local councils may have to fund these services.

2. Mitigation of HS2 Noise & Nuisance.

From the sound recordings accompanying the HS2 roadshow, with full noise mitigation, HS2 trains can be clearly heard 300m away, corresponding with Banks Road. Noise generated in the sidings can be clearly heard on Banks Road & beyond. (The area is quiet because there is little activity at the sidings.)

People choose to live in Toton for its peace & quiet. To preserve this tranquillity,

specialist noise mitigation will be needed to silence the station, high speed trains and classic rail trains. HS2 Ltd do not intend to supply this. Trees will be insufficient. A specialist barrier(s) is necessary, which may obscure view of & access to the sidings. To assist, a noise specialist should be consulted and ambient noise readings should be taken around the neighbouring estate, independently of HS2 Ltd. HS2 Ltd are delaying in producing detailed noise level estimates for the area.

An environmental assessment of the area in advance of that of HS2 Ltd may also be useful.

If there is pedestrian access to the station from Banks Road, motorists will transport rail passengers along Banks Road and drop them off, then reverse direction around the roundabout at the end of the road. Unfortunately, Banks Road was designed for residential access only, winds with blind corners and serves 2 schools. Motorists late for their train will behave selfishly and may cause accidents. There is also a rumour that the road will be modified to directly access the station. The station should not be accessible from the residential access roads.

To prevent rail passengers from parking in the residential streets, a residents' parking scheme has been proposed. However, while possibly necessary, the scheme has not been welcomed by residents who object to a loss of freedom and potentially having to pay. The scheme requires enforcement and may collapse if residents opt out. There needs to be a solution that does not require a parking scheme.

The 3 requirements described above should be added to the station's specification immediately.

The prospect of HS2 has caused residents living near the sidings considerable distress. These residents have had no representation from their councillors, the MP, Broxtowe BC, or the neighbourhood forum.

3. Toton Development Zone.

The real business case for HS2 is property development next to the HS2 stations. In 2011, Broxtowe BC unanimously agreed to open up all of Toton's green belt for development if HS2 sited the East Midlands station at Toton. This was after Rushcliffe BC refused to open up their green belt to development in return for an HS2 station at East Parkway. This development is not required to fill any need created by the station.

The Toton development zone was not needed for either the core strategy or HS2. Neither was it mandated by the planning inspector. It was created for the political reason of bringing HS2 to Toton. The zone later absorbed the 5% buffer on the 5-year land supply, together with housing moved from elsewhere in Broxtowe. The buffer housing requirement could have been obviated by taking advantage of a lower than expected census, trading with a neighbour in surplus, arguing that the forecasted need was due entirely to in-migration, or by moving the plan's start date.

Broxtowe currently has a surplus of employment sites, with under used sites being converted to housing. The core strategy requires that office space be increased in proportion to the population, an increase which can be absorbed by the Boots development zone. Industrial land usage is expected to reduce with time. So new employment land at Toton is surplus to demand. Most of the development west of Toton Lane/Stapleford Lane has already gone to housing. If offices are built, over time, they may become occupied by local companies through churn.

Broxtowe had an excellent employment site in Beeston Rylands, hosting technology companies, startup units and a train station. Workers there shopped in Beeston town centre. Unfortunately, the site was neglected for decades and eventually converted to housing. At the end, an attempt to retain the site for employment failed over the section 108 agreement. Even the train station was maintained by a historical society, rather than by Broxtowe BC. So Broxtowe & other local councils have no interest in technology development sites.

The most useful aids for startups are probably finance & low rent offices.

3.1. Sidings.

The sidings are not suitable for housing because of the train noise. HS2 will be the loudest train in the world.

Buildings in the sidings will need specialist noise insulation, with non-opening windows facing the trains. High rise buildings may find train noise directed upwards at them.

There are conservation areas and a flood protection device on the west side of the sidings. These need to be protected from development. Currently, Toton residents near the sidings are at no risk of flooding and this asset must be preserved.

With an access road to the A52, land south of the station (and perhaps north of the floodplain) will be opened up for development. In fact, this area may be the most likely to be developed and should be marked as such on maps of the zone. Mayfield Grove may be opened to through traffic.

3.2. West of Toton Lane/Stapleford Lane.

In consultation response to the outline planning application, it was suggested to match housing (500 houses @25 houses/ha) plus employment plus community infrastructure in a 1:1 ratio with open space, over both sides of Toton Lane/Stapleford Lane.

The full 30% of affordable housing should be built. Money should not be allocated in lieu.

3.3. East of Toton Lane/Stapleford Lane.

The core strategy should have already allocated sufficient resources & space to the housing estate and school at Toton Lane/Stapleford Lane, covering schooling, medical, shopping & leisure. No justification has been given for further school expansion. Since the school has sufficient space for local pupils, then takes pupils from outside its catchment area to fill to capacity, further expansion is simply expansion for its own sake.

Further development or redevelopment east of Toton Lane/Stapleford Lane should be considered in the next core strategy, together with the fate of the green belt land there running through to Bramcote.

Any leisure centre should be kept separate from the school, since academies are conducive to corruption.

4. Chetwynd Barracks.

In the 2015 Government Spending Review, the Treasury ordered the Ministry of Defence to sell off land for housing. Not needed by the core strategy, this site is (presumably) absorbing housing allocated elsewhere in Broxtowe.

In consultation response LP1128752, it was suggested to keep the site's degree of development roughly the same as it is now. Housing (800 houses @25 houses/ha) plus employment plus community infrastructure in a 1:1 ratio with open space. (This assumes all existing buildings are demolished.)

5. Miscellany.

Toton residents are likely to use classic rail stations, e.g. Long Eaton & Nottingham, over HS2 to avoid paying the high speed premium. Living with the noise & nuisance of HS2 will be constant. So mitigation against HS2 should be prioritised over access to HS2, and access to other stations should be prioritised over access to HS2.

The Toton-Nottingham tram needs to be evaluated against its objective of significantly

	<p>reducing road congestion. If most of its passengers have transferred from buses, the tram has failed. Additional park & ride stops need to be added at each major roundabout the tram passes. A congestion charge may have to be introduced. The tram's economic impact is as expected. It has not increased footfall in Beeston, but has encouraged the migration of jobs from Beeston to Nottingham. In this, the tram is analogous to HS2.</p> <p>Connecting East Parkway station to the airport and to the (south of Trent) tram is more important than connecting the airport to HS2.</p> <p>An adhoc survey of Bardills Island was conducted just after the completion of the roundabout's improvements for the tram park & ride. No congestion was present during morning or evening rush hours over a 5-day working week.</p>
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Question 4

Question 4: Modifications sought	
Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this modification will make the Local Plan legally compliant or sound.	Stop support for HS2 and cancel Toton Development Zone.

Question 5

Question 5: Public Examination Attendance	
If your representation is seeking a modification, do you consider it necessary to participate at the public examination?	No
If you wish to participate at the public examination, please outline why you consider this to be necessary	

Details

Agent	
Please provide your client's name	
Your Details	
Title	Mr
Name	tideswell
Organisation (If responding on behalf of an organisation)	
Address	<div>■■■■■</div> <div>■■■■■■■■■■</div> <div>■■■■■■■</div> <div>■■■■■</div>
Telephone Number	<div>■■■■■■■</div>
Email Address	<div>■■■■■■■■■■■■■■■</div>
Would you like to be contacted regarding future planning policy consultations?	Yes
If you wish to comment on more than one issue you will need to submit a form for each representation.	

Policy relates to

Please specify what your comment relates to					
Policy number	Page number	Policy text/ Paragraph number	Policies Map	Sustainability Appraisal	Other (e.g. omission, evidence document etc.)
	84	school relocation i.e goerge spencer		sustainability of land use	creating/usage of extra carbon foot print

Question 1: What does your comment relate to? Please specify exactly
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Question 2

Question 2: What is the issue with the Local Plan?	
Do you consider this paragraph or policy of the Local Plan to be:	
2.1 Legally compliant	No
2.2 Compliant with the duty to co-operate	No
2.3 Sound	No

Question 3

Question 3: Why is the Local Plan unsound? Please only answer this question if you answered 'No' to 2.3 above	
If you think this paragraph or policy of the Plan is not sound, is this because:	
It is not justified	Yes
It is not effective	Yes
It is not positively prepared	No
It is not consistent with national policy	No

Additional details

<p>Please give details of why you consider this part of the Local Plan is not legally compliant, is unsound or does not comply with the duty to co-operate. Alternatively, if you wish to support any of these aspects please provide details.</p>	<p>as there is no given valid/ reason for the demolition of the George Spencer school, it is a total waste of carbon foot print, and also a waste of valuable land in the area it wants to be re-built, as there were already plans that had been submitted by Pevrill to expand the school in situ/ i.e on its present location, which would lessen the carbon foot print, and also we mean that the other site could be utilized for an infant/junior school, as is needed in that area. as all local infant/junior schools are already having difficulty in providing enough spaces for the present population of these children.</p>
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Question 4

Question 4: Modifications sought	
<p>Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this modification will make the Local Plan legally compliant or sound.</p>	<p>to be compliant. they need to refer back to the original Pevrill plan that has already been submitted to B.B.C. i.e increasing the capacity of the school on its present site, and using the other site to build an infant/junior school to cover for the shortage of spaces and increasing numbers of 5-11 year olds in the area.</p>

Question 5

Question 5: Public Examination Attendance	
<p>If your representation is seeking a modification, do you consider it necessary to participate at the public examination?</p>	<p>Yes</p>
<p>If you wish to participate at the public examination, please outline why you consider this to be necessary</p>	<p>I believe that the B.B.C. have not looked at and considered all the logical options, and may not even be aware of the advantages that can be gained locally, by using the other site for an infant/junior school, as opposed to pulling down a school and creating more carbon foot print to relocate a school. e.g George Spencer school at present as well as having consistently received excellent Ofsted reports, is also one of the few schools that has a safe area where pupils can be safely dropped off at school without causing a traffic jam and this could also be true if the B.B.C. use the other site wisely for an infant/junior school. as opposed to the problem that had daily on Eskdale rd. Chilwell and also outside the junior school in Toton.</p>

[REDACTED]

From: Daniel Sellers [REDACTED]
Sent: 30 October 2017 16:39
To: Policy
Subject: Dan Sellers 2017-10-30

Dear relevant department,

Local Plan feedback

I fully support the **New Local Plan** consultation document.

I feel it is important that Brownfield sites are redeveloped (such as the barracks in the Chilwell / Attenborough area, the former Boots factory & cement works in Beeston) and also that Listed Buildings are used & maintained to stop them becoming derelict.

It is also important that the proposed development to the east of Toton railway yard maintains the green gap between the railway line and Toton village.

With regard to the Bennerley opencast site, as this is in the Green Belt I feel it should be remediated and retained to green land with restoration of the disused railway viaduct.

I would support residential conversion of the disused farm buildings opposite Trowell Church, between the A6007 and the railway line.

Finally, good to see that work on the residential conversion / development at Kimberley Brewery has now started.

Regards,

Dan.