

Policy 3.3 - Bramcote (East of Coventry Lane):

ID	Organisation
Duty to Co-operate / Interest Groups	
18	Nottinghamshire Campaign to Protect Rural England (supported by Nottinghamshire Campaign for Better Transport)
34	Nottinghamshire Wildlife
48	Sport England
55	Pedals (Nottingham Cycling Campaign)
73	Stapleford Town Council
211	Nottinghamshire County Council
222	Severn Trent
6276	Nottingham West Clinical Commissioning Group
6279	Bramcote Neighbourhood Forum
6925	Hillside Gospel Hall Trust
Developer / Landowner	
6048	White Hills Federation Trust (represented by Barton Willmore)
4200	Taylor & Burrows Property (Represented by Phoenix Planning (UK) Ltd)
6925	Hillside Gospel Hall Trust (Represented by Pegasus Group)
Individual / Local Resident	
720	Pearson
1060	Campbell
1485	Steel
1494	Turville
2565	Johnson
3536	Jones
3586	Austin
5893	Hartman
5896	Huxtable
5951	Nathanail
5951 (2)	Nathanail
5951 (3)	Nathanail
5981	Bellamy
6056	Hill L
6057	Hill M
6523	Kypraios
6874	Bowker

Response to Broxtowe Local Plan Part 2 Publication version (Sep 17)

Nottinghamshire Campaign to Protect Rural England

3rd November 2017

Please contact
Bettina Lange
Policy Adviser



Policy	Comment	Changes proposed
3.3 3.4 3.7 4.10 5.1 7.1	<p>The key development requirements for each of these major housing allocations include provision for an enhanced bus service “adjacent to” the sites. While we welcome this, we do not think it is sufficient to maximize encouragement to use alternatives to the car. The distances to the nearest bus stop would be too large for most people to be able (or willing) to walk there. So the policy as it stands would undermine the Plan’s sustainable transport objectives.</p> <p>Our comments here are also supported by Nottinghamshire Campaign for Better Transport.</p>	include provision for bus services <u>into and through the sites</u> in the key development requirements
8 (Green Belt)	We welcome this policy, especially the clarification in 4. of what is to be regarded as a town. Without the clarification, there would be a real risk of coalescence.	
20 (Air Quality)	<p>We welcome this policy because it provides a clear steer to development in accordance with the Local Plan’s sustainability and sustainable travel objectives.</p> <p>This policy is also supported by Nottinghamshire Campaign for Better Transport.</p>	
23 (Heritage)	We welcome this comprehensive policy.	
26 (Travel Plans) : “All developments of 10 or more dwellings or 1,000 square metres or more gross floorspace will be expected to submit a Travel Plan with their application.”	We welcome this policy because it provides a clear steer to development in accordance with the Local Plan sustainable travel objectives. Having such a policy will also make Local Plan delivery more effective and efficient compared to the labour-intensive process of assessing each planning application case by case with regard to whether a Travel Plan is needed.	

	<p>This policy is also supported by Nottinghamshire Campaign for Better Transport.</p>	
28 (Green Infrastructure)	<p>We welcome the inclusion of informal and amenity Green Infrastructure and the requirement to enhance these. However, there is a significant risk to the implementation of the policy in practice if the proposed wording is retained :</p> <p>“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, <u>unless the benefits of development are clearly shown to outweigh the harm.</u>” (our emphasis)</p> <p>The lack of clarity as to what would constitute a benefit and for whom leaves so much room for interpretation as to undermine the overall policy intention. This would make this aspect of the Local Plan <u>unsound.</u></p>	<p>reword the policy by deleting “unless the benefits of development are clearly shown to outweigh the harm”.</p>

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]
[Redacted]
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**.



Carnegie Civic & Community Centre



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

2nd November 2017

Dear Mr. Saunders,

Broxtowe Local Plan Part 2

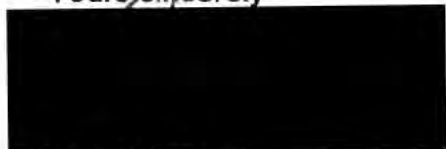
Please find attached the comments regarding the Broxtowe Local Plan Part 2, as discussed by Stapleford Town Council at its Meeting held on 13th October 2017.

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.

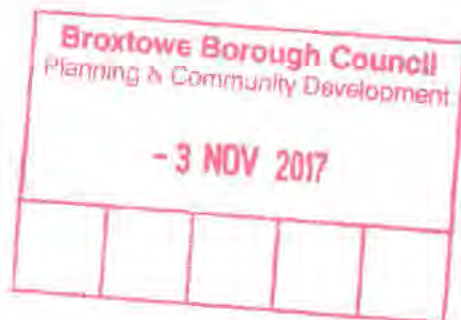
Further, I have been instructed to inform you that Stapleford Town Council would wish to be invited to the Public Examination of the Broxtowe Local Plan Part 2 and would reserve the right to speak to its comments.

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.)
4: Awsworth Site Allocation					

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.	<p>Policy 4.1 section 4.5 of the P2LP explains that access to the site is expected from Awsworth Bypass yet this is only to be considered as a last resort and wouldn't be favoured by the highway authority. The IDP on page 75 explains the highway authorities position. This appears inconsistent with the policy in the P2LP.</p> <p>NCC would be very grateful for your thoughts on the apparent discrepancies and inconsistencies between the two consultation documents.</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.

Policy 4.1 section 4.5 of the P2LP explains that access to the site is expected from Awsworth Bypass yet this is only to be considered as a last resort and wouldn't be favoured by the highway authority. The IDP on page 75 explains the highway authorities position. This appears inconsistent with the policy in the P2LP.

NCC would be very grateful for your thoughts on the apparent discrepancies and inconsistencies between the two consultation documents.

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 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 Awsworth.	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 Awsworth.	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

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




NHS Nottingham West CCG

Details

Agent	
Please provide your client's name	
Your Details	
Title	
Name	
Organisation (If responding on behalf of an organisation)	Bramcote Neighbourhood Forum
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.)
2: Site Allocations	32	Policy 3.3 para 3.8			

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	No
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

<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 aspiration for a "Replacement Leisure Centre (if required)." is ambiguous and open to abuse and should be changed to read "Replacement Leisure Centre"</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>The text should be amended to read "Replacement Leisure Centre "</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>The local community is being asked to pay a very heavy price in the loss of a major asset and is getting nothing tangible in return while at the same time it faces the prospect of losing a major and much used, indeed profitable, public facility in the form of a leisure centre. The Coventry Lane playing fields should be developed in a way the generates enough surplus to develop a new school and a new leisure centre (on the former site of the Bramcote School).</p>

BIRMINGHAM
BRISTOL
CAMBRIDGE
CARDIFF
EBBSFLEET
EDINBURGH
LEEDS
LONDON
MANCHESTER
NEWCASTLE
READING
SOUTHAMPTON

**BARTON
WILLMORE**



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

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

26241/A3/JR/sn/ds

3rd November 2017

Dear Sir/Madam

PART 2 LOCAL PLAN 2017-2028 CONSULTATION – PUBLICATION VERSION – POLICY 3.3 BRAMCOTE (EAST OF COVENTRY LANE)

On behalf of the White Hills Park Federation Trust ('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 site under Policy 3.3, Bramcote (east of Coventry Lane). These representations are made wholly in respect of this land which for the purpose of this representation will be referred to as ('the Site') which is identified as site reference Policy 3.3 Bramcote (east of Coventry Lane) located within the Bramcote Ward. The Site is currently identified as a housing allocation.

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.

12/11

Whilst our Client fully supports the housing allocation and its retention, as drafted, they consider that the Part 2 Local Plan in respect of the site specifics and the requirements within Policy 3.3, is not sound when considered against the tests outlined above and therefore **objects**.

In particular, the current requirements outlined in the key Development Requirements of Policy 3.3 are not based on proportionate evidence and therefore not justified.

It is considered that these requirements are not backed by any robust supporting evidence and are therefore not fully justified, effective or positively planned. To make the plan sound it is considered the following amendments should be made to the final allocation:

- Amend the Site capacity to 500 dwellings; and
- Amend the Key Development Requirements of Policy 3.3: Bramcote (east of Coventry Lane) as outlined in section 3 of this representation.

2. General Comments

Our Client is currently in the process of preparing a planning application for part of the site to assist in the short-term delivery of a replacement school on land currently occupied by Bramcotes College. Pre-application discussion have taken place on this subject with the Council and discussions with Nottinghamshire County Council on their retained land, which also forms part of the allocation.

The planning application is likely to be made in advance of submission of the plan and therefore will be reliant upon the cross funding of the new school as Very Special Circumstances (VSCs). It should however be noted that these VSCs are considered necessary in a development management situation but not a local plan making process, whereby 'exceptional circumstances' should be shown for Green Belt release.

The planning application will only cover part of the site, however, in order to promote the whole site a comprehensive masterplan supported by technical documents has been produced to show a comprehensive development across the whole site in accordance with these representations.

3. Site Specific Representations

The remainder of this letter identifies the site specific representations to Part 2 of the Local Plan, with reference to Policy: 3.3 Bramcote (east of Coventry Lane).

POLICY: 3.3 BRAMCOTE (EAST OF COVENTRY LANE)	
Ward	Bramcote
Site Reference	Policy: 3.3 Bramcote (East of Coventry Lane).
Promoter of the Site	White Hills Park Federation Trust
Status in the Local Plan part 2	Housing Allocation
Comments	Our Client supports the principle of the sites release from the Green Belt and supports the sites allocation for housing development.

<p>Key Development Requirements</p>	<p><u>300 Homes (within the outline shown on page 33)</u></p> <p>Our Client <i>objects</i> against the Council's decision to allocate the Site for 300 units.</p> <p>The Site is 16.6ha in size, rectangular in size, greenfield and has very little constraints. For this reason, the current proposed draft allocation for just 300 units is very low and does not make the most efficient use of land. For a site of this size and nature, 300 units proposes development at a density of just 18 dwellings per hectare, almost half the usual 30dph expected on sites. On this basis our Client strongly objects to the artificial limitation on the site.</p> <p>Having considered technical constraints and masterplanned the Site, as per the attached plan, it is considered that a site capacity of 500 would be more appropriate for this site, which would result in a density of 30dph. The masterplan demonstrates that this can still incorporate access, open space, drainage and links to neighbouring land, together with an appropriate layout.</p> <p>By making more appropriate use of this land it would accommodate a large proportion of the homes required under Policy 3.4 Stapleford (west of Coventry lane) and reduce the impact on the Green Belt by reducing the level of land required to be removed.</p> <p>Stapleford (west of Coventry lane) is an irregular shape that is allocated for 240 units. The change in capacity of Policy: 3.3 Bramcote (East of Coventry Lane) to 500 would uptake 200 of the units proposed at Stapleford (west of Coventry lane).</p> <p><u>Incorporate design measures to slow the speed of traffic on Coventry Lane</u></p> <p>Our Client objects to the wording of this requirement. Coventry Lane is 1.1 miles long and much of the road is out of the control of our Client. Our Client has control of just 0.1 miles of frontage along Coventry Road and therefore it would be appropriate for the wording to be amended to reflect this. The proposed wording of this key Development Requirement is suggested as below:</p> <p><i>"Incorporate design measures to slow the speed of traffic along the frontage of the site fronting on to Coventry Lane where suitably possible."</i></p> <p><u>Provide a replacement school at a location south of the ridgeline, the ridge should be kept free of built development (within the outline shown on page 34)</u></p> <p><u>School redevelopment is to be delivered in conjunction with or prior to housing development (within the outline shown on page 34) and no houses are to be occupied until the school is substantially complete</u></p> <p>Our Client strongly objects to this key development requirement.</p>
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	<p>Our Client has been in discussions with the Council on delivering a replacement school as part of a planning application. However, it should be recognised that previously the site was considered a suitable housing site on its own merits, without regard to the school development being delivered.</p> <p>The Council notes that this site is "<i>One of the most sustainable sites to be allocated when compared to reasonable alternatives.</i>" Moreover, it has no unresolvable issues regarding infrastructure delivery.</p> <p>The site has been demonstrated and agreed by the Council as an appropriate, suitable and sustainable location for residential development. It is not for this development to directly or indirectly be responsible for the provision of a replacement school.</p> <p>Furthermore, the school redevelopment and this site are not mutually dependent upon one another and therefore should not be linked by association through the Key Development Requirements. Our client therefore objects to the requirement of linking the school and the housing.</p> <p>Further to this the policy requires the school to be delivered in conjunction or prior to the housing development. Should the school be linked this requirement is undeliverable as the school requires the funding from the sale of the land. As the funding for the school redevelopment would require the housing to come forward first, this requirement would prejudice the delivery of both. On this basis our client strongly objects to this requirement.</p> <p>It is suggested that both of these Key Development Requirements are removed from the housing allocation in order to ensure the deliverability of the housing site.</p> <p><u>For the reasoning outlined above, our client objects to the soundness of the plan.</u></p>
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4. Green Belt Release

Our Client supports the Green Belt release for this site and acknowledges the exceptional circumstances that the site fulfils that support the sites 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.

There are further the exceptional circumstances that are listed within the Site Selection Document, Main Report (September 2017), including:

- The areas at the north of the site bounded by the railway line/Coventry Lane to the west/the ridge to the south, and urban areas within Bramcote to the east performs well when assessed against the five purposes of including land in the Green Belt;

- The housing requirements cannot be met without some Green Belt release and Bramcote is one of the best performing sites in the SA;
- Bramcote is one of the highest value areas in the Borough of Broxtowe which means that development in Bramcote can secure greater public benefits from development than elsewhere;
- Two of the most immediate public benefits are the provision of 30% affordable housing in an areas of high affordable housing need and a complete redevelopment of the School; and
- Immediate access to large areas of attractive green infrastructure with health benefits for new and existing residents, but making such assets more accessible, particularly in traffic measures on Coventry Lane with a view to slowing cars down and making it safer to cross the road.

Given the nature of the enabling development the site will not be able to provide 30% affordable homes, however this will be dealt with through the planning application.

An assessment of the site against the five purposes of the Green Belt is given in the table beneath.

Green Belt Purpose 1: To check the unrestricted sprawl of large built-up areas
The site has strong defensible boundaries on all four sides. Coventry Lane to the west, woodland and a railway line to the north, residential development to the east and Moor Farm Inn Lane to the south. The proposed development would not cause any further sprawl of the settlement presents a logical site for development due to the strong defensible boundaries on all sides of the site.
Green Belt Purpose 2: To prevent neighbouring towns merging into one another
The site lies to the west of the settlement and the strong buffer to the western boundary would prevent any merging with another settlement. Moreover, the site does not encroach on another settlement nor have a 'neighbouring town' to do so.
Green Belt Purpose 3: To assist in safeguarding the countryside from encroachment;
The site was previously former playing fields associated with the adjacent school which has been unused as such for many years. As such the countryside will not be being encroached upon.
Green Belt Purpose 4: To preserve the setting and special character of historic towns;
The site is not within close proximity to listed buildings or areas of special character that require the preservation of the setting.
Green Belt Purpose 5: To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
As previously mentioned, the site was previously former playing fields associated with the adjacent school which has been unused as such for many years and therefore despite it being greenfield, it assists in encouraging the recycling of derelict land.

5. Conclusions and Recommendations

These representations have been prepared on behalf of White Hills Park Federation Trust and set out their comments in relation to the Broxtowe Borough Council Publication Version of the Part 2 Local Plan with a particular focus on the proposed housing allocation referenced Policy: 3.3 Bramcote (east of Coventry Lane).

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 residential development but objects against elements of the Key Development Requirements as outlined in this representation.

We trust that 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



Director

Enc. Plan of the Site

Note: Do not scale. Only use figured dimensions.
All discrepancies to be notified to this office.

Rev	Description	Dr	Date



STATUS For Discussion

CAD Associates
ARCHITECTS
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Email: mail@cadassociates.co.uk
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CLIENT
White Hills Park
Federation Trust

PROJECT
Bramcote Hills
Residential Masterplan

TITLE
Site Layout

DESIGNED BY ajw	CHECKED BY	DATE April 2017
SCALE 1:1250 @ A1	PROJECT NUMBER Bramcote Hills	REV
DRAWING NUMBER 4405C/16/SK03		

○

○

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:

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 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		
	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.)			

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.

Broxtowe Part 2 Local Plan



Broxtowe
Borough
COUNCIL

Agent

Please provide your client's name	Hillside Gospel Hall Trust
-----------------------------------	----------------------------

Your Details

Title	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Other:
Name	<input type="text"/>
Organisation (if responding on behalf of the organisation)	Pegasus Group
Address	<input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/>
Postcode	<input type="text"/>
Tel. Number	<input type="text"/>
E-mail address	<input type="text"/>

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 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 3: Main Built up Area Site Allocations	32	Policy 3.3
	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		
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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		✓

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.

Policy 3.3 proposes the allocation of land to the east of Coventry Lane for the provision of 300 homes. The area proposed for allocation is shown on Maps 8 and 10 and on the Proposals Map.

The Hillside Gospel Hall Trust own land immediately to the south of the proposed allocation. This consists of the Hall building, area of parking, surrounding land and the Moor Farm Inn Lane access from Coventry Road. This area of previously developed land is available for development and should be included in the proposed allocation area. The site extends to some 1.6 hectares and is shown on the accompanying plan.

The land east of Coventry Lane was identified as a potential allocation in the Council's Site Allocations Potential Additional Sites consultation in August 2016. This consultation identified a potential area for residential development including the Gospel Hall land. An extract from this consultation is attached at Figure 1 below.

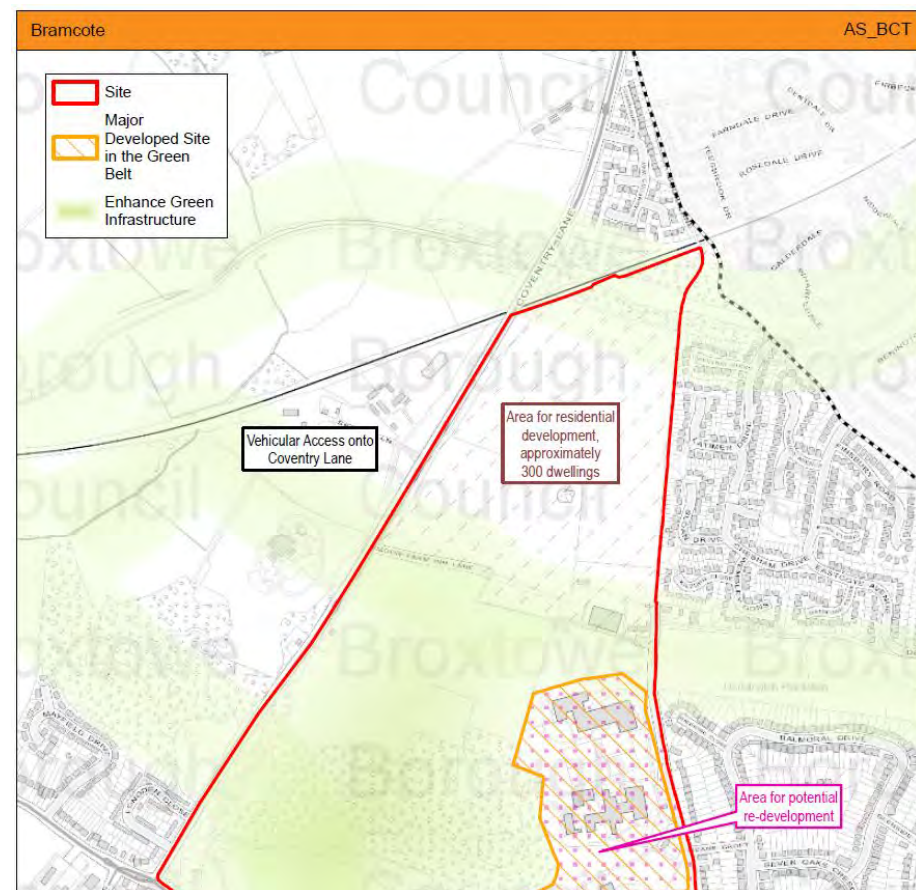
There is no clear justification why the Submission Draft allocation excludes the Gospel Hall Trust land. It is assumed that this was on the basis that the Council was not aware that the land was potentially available for development. The land is previously developed and has an existing access off Coventry Lane.

The justification for the removal of the land to the north from the Green Belt would apply equally to this land.

Extending the allocation to include the Gospel Hall Trust land would not breach the ridgeline to the south and would ensure the retention of an area of open space to the south.

The Gospel Hall Trust has confirmed that the land is available for development. The site has the potential to accommodate some 40 dwellings so would make a useful contribution to help meeting the **Council's housing requirements**. Inclusion of the Gospel Hall Trust land would represent a logical extension of the proposed allocation. Given the availability of the site for development, there is no justification for excluding the land from the proposed allocation.

Figure 1 – Extract from Potential Additional Sites Consultation



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 3.3 should be amended to include the Gospel Hall Trust Land as part of the proposed allocation. The Key Development Requirements should be amended to refer to the development of 340 homes and Maps 8 and 10 and the Proposals Map should be amended to show the Gospel Hall Trust land as part of the proposed allocation. The proposed modification is shown at Appendix 1.

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	
Given its interests in land to the south of the proposed allocation, it is important that the Gospel Hall Trust is represented at the public examination.	

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:

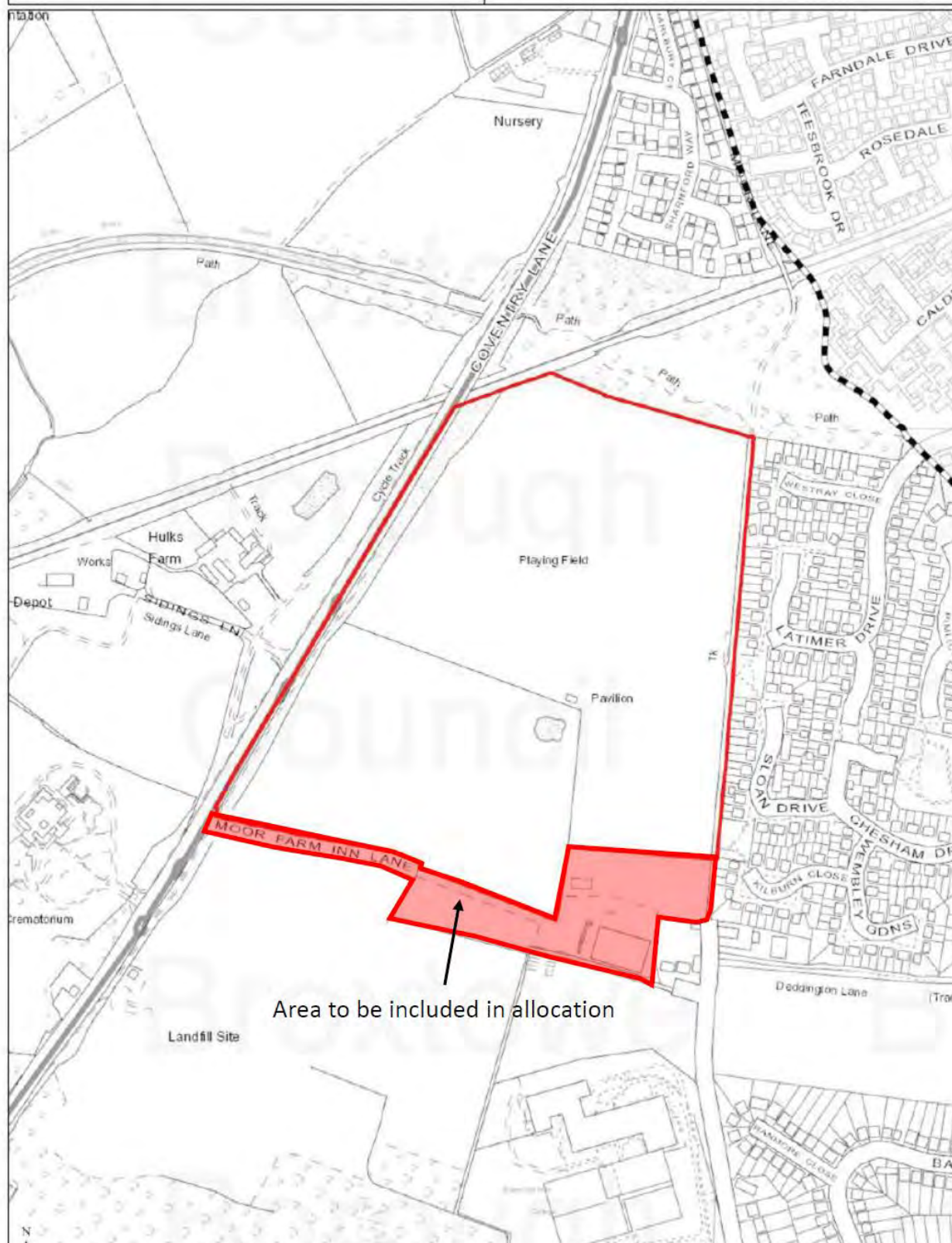
- **‘Justified’**: This means that the Local Plan is based upon a robust and credible evidence base. If you think that the evidence doesn’t support the choice made in our Local Plan, or there are realistic alternatives, then your comments may relate to whether or not it is ‘justified’.
- **‘Effective’**: 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**.

Appendix 1: Proposed Amendments to Map 8 and Proposals Map

Map 8: Bramcote (east of Coventry Lane)

Policy: 3.3	Bramcote
18.2 hectares	340 dwellings



Policy 3 24-25/27

Broxtowe Part 2 Local Plan



Broxtowe
Borough
COUNCIL

Agent

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

Your Details

Title	Mr <input checked="" type="checkbox"/> Mrs <input checked="" type="checkbox"/> Miss <input checked="" type="checkbox"/> Ms <input checked="" type="checkbox"/> Other: <input type="checkbox"/>
Name	DAVID PEARSON
Organisation (If responding on behalf of the organisation)	
Address	[Redacted]
Postcode	[Redacted]
Tel. Number	[Redacted]
E-mail address	[Redacted]

Broxtowe Borough Council
Planning & Community Development

- 3 NOV 2017

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 <u>would like</u> to be contacted by the Planning Policy Team regarding future consultations.	
Please tick here	<input checked="" type="checkbox"/>
Please help us save money and the environment by providing your correspondence can be sent to: [Redacted]	

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www.broxtowe.gov.uk/part2localplan

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

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	Policy 2: Site Allocations		
	Policy 3: Main Built up Area Site Allocations	21, 24-25, 27	3-31
	Policy 4: Awwsworth 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		
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	Policy 17: Place-making, design and amenity		
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	Policy 19: Pollution, Hazardous Substances and Ground Conditions		
	Policy 20: Air Quality		
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	Policy 23: Proposals affecting designated and non-designated heritage assets		
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	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: (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 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.

Para. 2.8-2.9. Removal of particular sites not sufficiently justified.
 Policy 3.3: Bramcote (East of Coventry Lane) - does not provide enhanced Green Infrastructure; when taken in context with development west of Coventry Lane it fragments the green corridor.
 Point 3: No evidence for "design measures to slow traffic - not deliverable."
 Point 6: "Enhance bus routes adjacent to site" - Not deliverable as services have already been reduced in this area over the last year.
 Key Development Aspirations - this is what it says an aspiration - not deliverable.
 Policy 3.4 Stapleford (west of Coventry Lane).
 Key development requirements - taken in conjunction with 3.3, it fragments the Green Corridor.
 Enhance Bus Services - comments as above.
 Final point - I see no evidence of buffer zone and the views from Stapleford Hill will be totally destroyed.
 2.18 This is just not true; the local infrastructure and road network make the development unsustainable on grounds of public transport (lack of); no amenities (shops etc) overhaul transport system is unlikely to support car traffic and the two in conjunction fragment the green corridor.

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.

I ~~cannot~~ cannot see how these development are sustainable and without major modifications to whole road network how they can be sustainable. There are far too many variables which are out of the scope of this plan to make it into something viable. Much of the things such as the road network and public transport are not under the control of Brextove Borough Council.

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

I wish to participate in order that I can put forward the view of the residents of Stapleford and also to be able to elaborate in more detail than is possible on this form, as to why these developments are not sustainable, particularly the sites referred to in Policy 3.4 and the damage it will do to the Green Corridors and highlight the lack of effective long term planning for the future infrastructure in the area, in particular with regard to highways, road structural & (wheelion) & increased congestion, which has not been considered.

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	Robert Ian Campbell
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.)
8: Development in the Green Belt	85				

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	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	Yes
It is not consistent with national policy	Yes

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>Green Belt land has some degree of legal protection, which seems to be totally ignored in the plan. The proposed developments on either side of Coventry Lane ignore the fact that this road is already over congested and to add hundreds more homes without improving road infrastructure will cause chaos. What co-operation has Broxtowe Borough Council tried to develop with Bramcote Neighbourhood Forum, which totally rejects the principle of development on Green Belt land?</p>
---	--

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>Find other areas within Broxtowe Borough that can be developed without encroaching on the Green Belt, e.g. industrial or retail sites that are no longer needed. This will avoid destruction of the Green Belt and make use of areas that already have a better road infrastructure.</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>	<p>n/a</p>

Details

Agent	
Please provide your client's name	
Your Details	
Title	Mrs
Name	Mandy Steel
Organisation (If responding on behalf of an organisation)	
Address	<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.)
3: Main Built up Area Site Allocations	32	3.3	8 and 10		Sound

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	Yes

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>This is precious green belt land and should be kept for future generations to enjoy. Bramcote is presently a much built up area and has already joined onto parts of Wollaton and Stapleford and so the Community identities and the 'green corridor' have already been eroded. Our understanding was that one of the aims of green belt land was to prevent 'urban sprawl'.</p> <p>We understand that there is a need for more housing generally but if the proposed housing development goes ahead with some 350 dwellings on the Coventry Lane land, Bramcote is being asked to take more than its fair share. It has already contributed 140 houses at the St John's College site and the proposed Golf Course development let alone other smaller developments. Surely this is sufficient for a small community such as Bramcote? Indeed a recent independent survey said that of the plan for 6000 houses in the Broxtowe Borough, Bramcotes share of this should be in the region of 180 houses. It should also be considered that circa 300 homes are planned for the western side of Coventry lane, this would mean that existing extensive greenbelt on both sides of Coventry lane (east and west) would be replaced with over 600 new homes, which is far too excessive. Certainly for the road infrastructure and wellbeing of the Coventry Lane area. Coventry Lane is already a very busy road for its size and it is one of the main arteries from this side of the City to the M1 and the north of the County. It does not bear thinking about the amount of traffic another 600 homes would create. The other issue is health care and the impact all of these new homes would have on the existing health care.</p> <p>Once the green belt has gone its gone, and we should do all we can to keep it.</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>The green belt to remain intact, with no planning consent to be given for development.</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>	

[REDACTED]

From: Saunders, Steffan
Sent: 03 November 2017 16:33
To: Policy
Cc: [REDACTED]
Subject: FW: Broxtowe Borough Council Part 2 Local Plan- Consultation- Bramcote

From: Martin Turville [REDACTED]
Sent: 30 October 2017 19:15
To: Saunders, Steffan
Subject: Broxtowe Borough Council Part 2 Local Plan- Consultation- Bramcote

Dear Mr. Saunders

Would you please accept my contribution to this consultation in the form below. I am away on holiday in a few hours. My return will take me beyond the closure date.

Martin Turville

[REDACTED]

[REDACTED]

[REDACTED]

As a member of the Bramcote Forum I support those democratic response comments on this "part 2 plan". -

I have my own personal view relating to the future for Bramcote. This is strongly influenced by the approved - outlined housing plans for Field Farm, the disused Golf Course, St John's college land to the likely impact of these - on Bramcote. I restrict my comments to the following. -

Green Belt: -

Changes to the green belt should not be accepted except by minor exception agreed by the Forum. -

Housing: -

Consequence to the status of retaining the existing green belt no residential development should be approved on - the Coventry Lane playing fields or the site to the west. -

Bramcote is one of the highest density populations of Nottinghamshire. With the approved outline plans defined - above, the central Government independent housing requirements assessment of 150 to 180 dwellings by 2025 is already very near met with sufficient time to meet the requirement. -

Transport: -

Bramcote is well served by bus services. These may need some minor review in frequency and routing on completion of the planned developments.

Congestion on existing roads within Bramcote Hills specifically on Moor Lane, Deans Croft and Arundel Drive at both the junctions with Deans Croft and Thoresby Road are a serious concern. The junction of Arundel Drive to Thoresby Road is particularly concerning with A52 east bound traffic 'U' turning westward. These are additional to A52 traffic 'rat runs' along Moor Lane then via Arundel to turn west onto the A52. Restrictive measures are required to reduce danger and environmental impacts.

The A52 through Bramcote needs traffic calming to restrict speed to 30 MPH specifically considering the crest of the hill westward approaching the Sherwin island with greater use of house driveways from new housing developments and eastward past the Leisure Centre/schools entrance and Moor Lane to the Schools.

Education

I consider the Nottinghamshire County Council action to release the NCC free hold of the WHP School Academy playing fields to the Academy, at current value with their intent to develop housing for funding a new school building, beyond NCC responsibility and to the loss, at a minimum of the Bramcote Community. As an academy the school receive direct Central Government funding. Governors and sponsors sought and achieved academy status and should operate within that funding. They have not justified additional public funding. The vast majority of Bramcote rates go to the NCC of which education is a major spend. If the free hold has to be relinquished and planning permission is granted for development then other stretched services of NCC should be proportional beneficiaries of the developed freehold.

Steffan Saunders
Broxtowe Borough Council
Foster Avenue
Beeston



3 November 2017

Dear Steffan

Broxtowe Core Strategy – Part 2

I am writing this as I have attempted to respond to your Consultation on line but found that if I wished to make more than one comment I was stymied.

I also echo the comments at the end of the forward by the Chair and Vice Chair of the Jobs and Economy Committee “we would like the Borough to continue to be an excellent place to live, work and spend leisure time”

My 1st Comment is about the map on Page 17 of the Bramcote & Stapleford Open Design East Midlands Document. The Green Infrastructure Links are illustrated. In my opinion the link along Moor Lane is not wide enough. The Land that is East of Coventry Lane and formerly used as Playing Fields is, at the moment, in Green Belt and is open grass land. Part of the area is scrub land annotated as Bramcote Moor Grassland LWS.

The proposed building of houses on Field Farm and to the west of Coventry Lane will effectively block the Green Corridor known as The Bramcote Ridge.

I suggest that a strip of land 50 metres wide should be set aside as a Green Infrastructure Corridor. This Green Corridor, immediately adjacent to Moor Lane, should stretch from the Bramcote Ridge in the South to the Trees by the Old Nottingham Canal in the North.

Trees could be planted on this strip to assist in cleaning the air. The Trees will help take water from the area as the playing fields have been in the past boggy in places.

My 2nd Comment. - I refer to the 100 Dwellings that are to be built on the Bramcote Ridge or former Golf Course site. They do not appear within the list on page 24 and on the Map on page 27 Housing and Mixed Use Allocations and Commitments in Bramcote and Stapleford.

The information is not entirely accurate as presented at the beginning of a consultation.

I understand this information is only updated on an annual basis. It would seem to me that before a public consultation the information given to the public should be as up to date as possible. I acknowledge it would be impracticable to include every small site where housing is to be added or subtracted but the addition of 100 dwellings in my view is a substantial number.

I wonder whether these 100 dwellings are included in the information on page 75.

My 3rd Comment. – Within the Local Plan Part 2 document on Page 94 is a list of Key Development Requirements in Beeston Town Centre. I would like the provision of a Community Centre for use by clubs and societies. Beeston U3A has 750 members and over 60 Interest Groups and some of the groups are having difficulty finding suitable places to meet. The Pearson Centre has only partially filled the need.

My 4th Comment. – Policy 20 Air Quality. More can be done than indicated in your plan on page 119. With the growth of houses in the Borough we will see a rise in the use of Cars. Road junctions could be improved so that the number of stationary vehicles queuing at them is reduced. We should plant more Trees to help clean the air.

My 5th Comment. – Policy 27 Local Green Space – Bramcote Ridge is included twice on Page 154. I trust the land that is part of the Bramcote Ridge and is the former Golf Course Land is also included in this category. Special attention should be given to the development of the 100 dwellings on this land so that the planning inspectors stipulated restrictions are not exceeded.

My 6th Comment. - The Green Infrastructure Corridors Map 62 on page 160 is confusing as it indicates that Bramcote Ridge is linked into this structure. However, when the developments take place on Field Farm and East and West of Coventry Lane then the Bramcote Ridge will not be linked to this structure without the suggestion of the 50 Metre Strip of Land through the Playing Fields to the East of Coventry Lane.

My 7th Comment. - I would like to see the replacement for the Bramcote Leisure Centre built within Bramcote before the present Leisure Centre is demolished.

Yours sincerely

Mike Johnson

[Redacted signature block]

[REDACTED]

From: Roger Jones [REDACTED]
Sent: 03 November 2017 16:34
To: Policy
Subject: Planning Policy 2- Nos 3.3 & 3.4

For the attention of Mr David Lawson

Re our conversation this afternoon about the failure of the system to actually deliver my objections to the above proposals.

I write to object to the proposals to develop the land East of Coventry Lane, as this forms a barrier between an already developed area and together with the proposals for the land on the West side along with the already agreed development at Field Farm, would constitute a complete loss of Green Belt and would form a ring of housing totally surrounding Bramcote Park and Stapleford Hill (Hemlock Stone) with great detriment to the area. It would also completely stop any attempt at maintaining a wildlife corridor from Sandy Lane through the School site and onto the canal area.

The statement that development on these areas should not add to traffic/air pollution is laughable as development would lead to increases in both of these.

South Broxtowe is, as stated by our MP in her Election Manifesto 2010, already over developed and consequently Green Belt is extremely important to retain.

Please pass this email to the relevant planning officers as discussed in my phone call.

Thanking you.

Roger Jones
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

From: Stephen Austin [REDACTED]
Sent: 03 November 2017 12:04
To: Policy
Subject: Part 2 Local Plan Consultation

Dear Sir

It is extremely difficult to respond online to this consultation so I am sending my comments by email:

Policy: 3.3 Bramcote (East of Coventry Lane)

Key Development Requirements

1. I fully support the provision of replacement school which is badly needed.
2. The delivery of the school development clause looks too onerous (Consider Aldi at Stapleford) and should be modified to

School redevelopment is to be delivered in conjunction with housing development (within the outline shown on page 34) and no houses are to be occupied until the school is substantially complete.

3. A key development aspiration is replacement leisure centre (if required). A replacement leisure centre should be obligatory as local residents are supportive of the leisure centre remaining in Bramcote. This should be funded by increasing the number of homes built on Coventry Lane playing fields from 300 to the Councils target of 40 per hectare.
4. A key development aspiration is to mitigate highways impact on the wider road network to ensure that congestion is not made worse than currently exists. This should be made obligatory with improvements to the Coventry Lane/Ilkeston Road/Hickings Lane junction. This should include land/property sacrifice if necessary.
5. I am opposed to the removal of vegetation from the sandstone cutting off Moor Lane. This is unnecessary and destroys the attractive character of the cutting. Some removal may be required for safety reasons but should be as limited as possible.

Sustainability Appraisal

1. This says there is only minor green objective disbenefit because of inevitable greenspace loss to built development. This is not correct as the disbenefit is large. It is important therefore that a substantial wildlife corridor is maintained.

Map 61: The Local Green Space at land east of Coventry Lane Bramcote

There is no rationale for the removal of this land from Green Belt and designating it Local Green Space. Any argument re defensible boundaries does not hold water. Deddington Lane from Moor Lane to Coventry Lane provides a clear boundary. Residents are clear this should be the case and it does not affect school plans or a possible Café on the Park which can be justified by exceptional circumstances.

Yours faithfully

Stephen Austin

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED] pabc
Sent: 03 November 2017 12:36
To: Policy
Subject: FW: Broxtowe Local Plan part II on-line response form

From: [REDACTED] **On Behalf Of** Customerservices
Sent: 03 November 2017 10:46
To: pabc
Subject: FW: Broxtowe Local Plan part II on-line response form

From: Tom and Jenny Hartman [REDACTED]
Sent: 03 November 2017 09:27
To: Customerservices
Subject: Broxtowe Local Plan part II on-line response form

Dear Sir/Madam,

Please could you forward this note to the appropriate authorities.

I would like to inform you that the local planning consultation placed by Broxtowe council is one of the hardest bits of online documentation that I have ever had to try and fill in (and I am used to university level administration). Wanting to add some comments to the proposals for development within the area (admittedly close to the time limit, I tried filling it out this Friday morning) I followed the links to the online form and it seems to me that I need to have a whole morning free to fill it in with needing to give policy numbers, page numbers, paragraph numbers, etc. on the very first page. It seems to me that this is the best way that a council can ensure that no one responds as the amount of effort level is so high. I do have comments to make about the plan part II, but without having a huge amount of time to devote to checking the precise paragraph number of the report that I wish to comment on. In essence, the plan seems to be flawed in several respects including

1. - No notice of the 100 or so dwellings to be built on the former golf course.
2. - The council has not released land within Beeston Town square for dwellings such as the car park and derelict land opposite Tesco's.
3. - The map of the build-up area includes all of the countryside right up to the side of the M1.
4. - There is no discussion of the status of Bramcote Moor which, I understand, the council has issued a statement that it should be protected.

And many more.

These are the issues that I wished to comment on in the on-line form but the form itself is much too hard to fill out. For those of us who are very busy, the notion that a public fronted form to accept comments should be so hard to fill out is really exasperating when the issues are complex and there are so many facets of the plans missing in the document.

Thank you for your kind attention

Yours sincerely

Tom Hartman

Broxtowe Part 2 Local Plan



**Broxtowe
Borough
COUNCIL**

Agent

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

Your Details

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

Broxtowe Borough Council
Planning & Community Development

20 OCT 2017

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 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 3: Main Built up Area Site Allocations		
	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 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	✓ BRAMCOTE	
	Policy 28: Green Infrastructure Assets	✓ BRAMCOTE	
	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: (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 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.

Please see enclosed letter

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.

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**.

Details

Agent	
Please provide your client's name	
Your Details	
Title	Mrs
Name	Judith Nathanail
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.)
3: Main Built up Area Site Allocations	32	3.8			

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	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 key development aspiration states 'Replacement Leisure Centre'(if required). There is no justification as to why the term'if required' is used. The Leisure Centre is 50 years old and will need replacing soon. The Leisure Centre is well used by people of all ages. It is a valued community facility, has major health benefits and contributes to community cohesion due to regular meetings with neighbours.</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>A Replacement Leisure Centre in Bramcote should be included in the Local Plan, possibly at the location of the former Bramcote School</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	Mrs
Name	Judith
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.)
20: Air Quality	119				

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	No
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	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>Air Quality is a known issue in Broxtowe. Significant additional housing is proposed east and west of Coventry Land and at Field Farm. Redevelopment of the school will increase secondary and probably (in future) primary school children numbers. Additional traffic on Coventry Land, A52 and, in particular along Moor Lane for school drop off will worsen air quality. In the case of Moor Lane, vulnerable children walking to school will be affected as well as residents</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>The plan needs to include measures to reduce the schools traffic to Moor Lane, including measures to discourage cars and measures to spreading the areas where children in cars are dropped off. One option is to plan the spine road in any new development east of Coventry Lane to include a drop off zone close to the pedestrian access to the schools</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	Mrs
Name	Judith Nathanail
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	82	3.8			

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	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>The plan is unsound as it is ineffective in relation to mitigating highways impact on the wider road network to ensure that congestion is not made worse than currently exists. Development east and west of Coventry Lane will generate additional traffic which increase congestion at 1. the Jaguar roundabout 2. along the A52 and 3. on Moor Lane for access to the schools.</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 mitigate against additional traffic on Moor Lane, the spine road in any new development on the east of Coventry Lane should be designed to include a drop off area adjacent to pedestrian access to the schools on Moor Lane.</p> <p>To mitigate against additional traffic in the area of the Jaguar roundabout and A52 the developments should either not go ahead, or effective measures to reduce traffic congestion be proposed and implemented</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>	

Broxtowe B C
Town Hall
Foster Avenue
Beeston
Nottingham
NG9 1AB



10 November 2017

Re Part 2 Local Plan

Dear Sir

I would like the following points considered

Some of the Maps and text do not match and do not provide full details of the areas under consideration.

Pedestrian and vehicular access to the school should be from Moor lane and Coventry Lane in order to minimise congestion on the main roads in the area. The car park off Coventry Lane originally proposed by Biffa should be built providing access to the school.

The local nature reserve on the land adjacent to Coventry Lane should be protected.

Traffic on Moor lane should be minimised to reduce to a minimum the pollution from vehicles protecting the children, residents and adults attending local schools.

More control should be built into roads in order to reduce the speed of vehicles.

Brown field sites must be developed before new land is used for housing.

A new sports centre with a competition spec pool should be built on the Park school site with the existing sports centre site being landscaped and returned to the park.

Yours Sincerely



Michael Bellamy

note. the computer system used for this consultation was very complicated and not at all friendly and must have deterred many people from responding

To: Planning Policy Team
Broxtowe Borough Council



2nd November 2017

Broxtowe Local Plan Part 2 - Bramcote Area.

Dear Planners,

I have been trying to fill in the forms that are provided, both downloadable and online, but they have been too difficult for me and I hope that you will read this simple letter and take it into account.

I am writing in response to the consultation opportunity for the Local Plan Part 2 as it affects Bramcote.

I am very concerned about the loss of greenbelt land for housing. It is recognised that green spaces enhance people's lives and are necessary for physical health and mental well being. Greater importance should also be given to the value of the countryside to agriculture and keeping Britain more independent of overseas markets. In fact the present government have said that they wish to protect the greenbelt.

Bramcote is already impacted by the giving of outline planning permission on the site of the old Bramcote Hills golf course and also the close proximity to the Field Farm site in Stapleford which has been approved for housing. If the proposed sites adjacent to Coventry Lane are also built up then a huge chunk of greenbelt is taken out. Soon there will be no green space between Stapleford and Bramcote.

The maps provided online still indicate the former golf course as green space which gives a misleading picture of the Bramcote area.

If the development of the school playing fields alongside the Moor Lane footpath and bridle path is allowed to go ahead then I hope that you will ensure the provision of at least a 50 metre buffer zone between the path and the new housing to provide a reasonable green corridor between that and the existing Bramcote Moor estate.

The housing density of the surrounding area seems very high and the allocation of such a lot more land will mean that there will be a lot more pollution from vehicles and this is also a concern.

Yours faithfully,

Broxtowe Borough Council
Planning & Community Development

- 3 NOV 2017



L. D. HILL (MRS)



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To: Planning Policy Team,
Broxtowe Borough Council.



2 November, 2017

Consultation on Broxtowe Local Plan Part 2 - Bramcote Area.

Dear Sirs,

I am choosing to use a letter to inform you of my opinions regarding the Broxtowe Local Plan Part 2 proposals for the Bramcote area as I find the online and PDF methods both incomprehensible and difficult to use. I do however recognise that I wish to take the opportunity given to be able to comment on the plan during the consultation period and I hope that you find the following comments helpful in formulating the final approved version.

I understand that there is a commitment to provide more housing within the Bramcote area and that there are proposals as outlined within the document for housing development off Coventry Lane associated with building a new school adjacent to the Moor Lane educational facilities currently existing. I personally would not be opposed to this provided other amenities were preserved. For example, I consider it essential that a new Leisure Centre very close to where the present building is at the Bramcote Hills site is provided before it ceases functioning.

I have examined the maps provided but find them not up to date and insufficiently detailed. For example, I cannot find any mention of the possible development of the Bramcote Hills Golf Course site between Thoresby Road and Moor Lane. This is still indicating a green space even though, I understand, there are plans to provide old persons accommodations which are much further forward than the proposed sites either side of Coventry Lane. Further not all areas are adequately identified. For instance, at a recent meeting mention was made of various plots of land such as "2a" and "2b" which are not identified as far as I am aware on any of the consultation maps and those who attended that meeting were left in confusion. I consider, therefore, that I have been given insufficient information upon which to form judgements from the consultation documents.

A further point is that I do not find the Local Plan Proposal positively prepared in that there is insufficient detail as to how the general infrastructure will be affected and, most important, as to how these problems are to be solved.

Broxtowe Borough Council Planning & Community Development				
- 3 NOV 2017				

As but one example, the road system will be drastically overloaded. It is already known that the junction of Coventry Lane with Ilkeston Road is totally inadequate and the Sherwin Arms junction is nearing that stage also but I do not see anything stated as to how this can be overcome. I suspect that sometime in the future with the advent of Field Farm development together with housing developments either side of Coventry Lane that high density traffic streams will be generated which will overwhelm the road network in the area from Hickings Lane, Stapleford, through to the Sherwin Arms roundabout and beyond to the extent that there will be complete gridlock not only at busy times but throughout the day. Further, the developments either side of Coventry Lane will increase the traffic flow to the five ways junction to the north and again this is apparently ignored. Though outside the area that I am principally concerned about I can also foresee greatly increased traffic volumes down Hickings Lane through the centre of Stapleford as residents attempt to access the A52 for the tram terminus and M1 routes.

Nothing in the document is stated about these influences or a solution offered. They have been apparently glossed over. Feasible solutions surely must be fundamental to any plan otherwise it is simply not viable. I am now retired from industry but was involved in project management where a significant and necessary part of the project brochure was the identification of problems and their solution. If this was not contained within the document then it was immediately returned with the instruction to include! Failure to offer solutions is not "consistent with achieving sustainable development". Should not the plan identify and contain statements on this this before considering the viability of any development? Any plan without these statements is incomplete.

I would appreciate a reply to the points raised in this letter. If you wish you may use e.mail for this purpose for which my address is [REDACTED]

Yours faithfully

[REDACTED]

Maurice Hill

Details

Agent	
Please provide your client's name	
Your Details	
Title	Mr
Name	Theodore Kypraios
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.)
3: Main Built up Area Site Allocations	32	Policy Number 3.3	Map 8		

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	Yes
It is not consistent with national policy	Yes

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 policy considers to give permission to built 300 dwellings on a land which at the moment is not classified as green belt.</p> <p>We have not been given evidence as to why this piece of lands is taken away from Green Belt. There are terms such as "substantially complete" which seem vague to me.</p> <p>We have also not been given evidence as what the Council has done in order to ensure that the proposed plan is financially viable.</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>If the area is taken out of Green Belt and permission is given for dwellings to be built, then I believe that an buffer between the new estate and the existing state of 50 meters (on the east of moor lane, eg Latimer Drive) which will reduce the impact of loosing the green space.</p> <p>It is important I believe that residents who lieve east of moor lane (Latimer Drive, Westray close etc) have as less impact as possible.</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	Mr
Name	John Bowker
Organisation (If responding on behalf of an organisation)	
Address	<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.)
3: Main Built up Area Site Allocations	32	Key Development aspirations para 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	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	Yes
It is not consistent with national policy	Yes

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 aspiration is for a replacement leisure centre "if required". My view is that it is imperative that a replacement leisure centre is a key development requirement to comply with the need to give the residents an opportunity to build and maintain their fitness, provide a social and safe environment to all ages to meet and engage in sport and to fulfil the need to provide an opportunity for all to learn new sport and health programmes. It seems ludicrous to mention about providing pedestrian and cycle routes to improve the fitness and well being whilst not committing to at least maintaining (if not enhancing) the sports centre. for the years ahead. An ageing demographic profile combined with more housing demands the continual presence of the leisure centre.</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>Make the replacement leisure centre a key development requirement</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>	