## Policy 3.6 – Beeston Maltings:

ID	Organisation			
Duty to Co-operate / Interest Groups				
34	Nottinghamshire Wildlife Trust			
222	Severn Trent			
6276	Nottingham West Clinical Commissioning Group			
Developer / Landowner				
2542	Mrs Viitanen (Represented by Featherstones)			
4622	Mrs Barnes (Represented by Featherstones)			
6881	Mr Taylor (Represented by Featherstones)			
2652	W Westerman (Represented by Oxalis Planning Ltd)			
2685	Bloor Homes Ltd (Represented by Oxalis Planning			
	<u>Ltd)</u>			
4200	Taylor & Burrows Property (Represented by Phoenix			
	Planning (UK) Ltd)			

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.



**Website** www.nottinghamshirewildlife.org

President

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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 upmost 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".

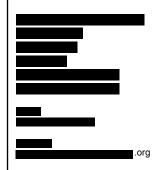
Whilst we **object** to this allocation because we consider it is encroaching significantly into the surrounding countryside and that local needs have been met by the adjacent Fields Farm site, achievement of a strong corridor is very important. We also agree with the last point of the 'key development 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.



Nottinghamshire Wildlife Trust



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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 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.



## Nottinghamshire Wildlife Trust



**Website** www.nottinghamshirewildlife.org

**President** Sir Andrew Buchanan Bt.

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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 Environmental 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 gueries.

Yours sincerely

Nottinghamshire Wildlife Trust



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#### **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
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		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 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 Stappleford 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 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 Stappleford Lane. Surface water will be able to drain to pre-existing surface water systems in the vicinity of the development.	Med
3.6	Beeston Maltings	1.3 ha	56	Lilac Grove STW	Based on topographic levels it is likely the development will connect to the sewage system on Cartwright Way to a 150 mm dia pipe. Surface water would also drain to the existing system on this road. The model does predict flooding on low RPs D/S on Ireland Avenue. However there are no incidents of flooding reported.	Low
	Beeston Cement Depot	UNK	21		Sewage from the development is likely to join the network on Station Road into a 375 mm dia combined sewer. Surface Water will be able to be connected to local surface water network. There are no reports of flooding in the area and flooding is not predicted in low return periods.	Low
	Wollaton Road Beeston	UNK	12		The building adjacent to the proposed development site has experienced repeat floodings recently. Return period analysis predicts flooding in a storm with a two year return period. The development is unlikely to have a noticeable impact to Severn Trent's sewage infrastructure, however, the development is likely to flood.	Low
	Awsworth	UNK	350	Newthorpe STW	Surface Water from the development will be able to drain to a local watercourse. Foul water from the development will join a 225mm dia combined sewer running across the development site. Flooding in a low return period is predicted downstream and there are pollutions recorded at Awsworth - A610 TPS. There are also a large number of flooding incidents upstream of the development in the south of Awesworth.	Med
4.1	Awsworth	UNK	250	Newthorpe STW	Surface Water from the development will be able to drain to a local watercourse. Foul water from the development will join a 225mm dia combined sewer running across the development site. Flooding in a low return period is predicted downstream and there are pollutions recorded at Awsworth - A610 TPS. There are also a large number of flooding incidents upstream of the development in the south of Awesworth.	Med
	Brinsley	UNK	150		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		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		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		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



**NHS Nottingham West Clinical Commissioning Group** 



Steffan Saunders
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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

Policy: 3.1 Chetwynd Barracks 500 homes with potential for 800+ overall

Land for Medical Centre required in order to make plan effective and therefore sound

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.

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.

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.

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.

Policy: 3.2 Toton - 500+ homes

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:

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.

We would like to consider any expansion to the Toton development over and above the original 500 houses alongside the Chetwynd Barracks development which





affects the same GP practice.

Policy: 3.3 & 3.4

Bramcote, East of Coventry Lane 300 homes Stapleford, West of Coventry Lane 240 homes The nearest facilities to these developments are Bramcote Surgery and Hickings Lane Medical Centre.

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.

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.

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.

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.

Beeston (339 homes / 780 residents)

Policy: 3.5

Seven Trent (Lilac Grove), Beeston

150 homes

Policy: 3.6

Beeson Maltings, 56 homes

Policy: 3.7 Cement Depot Beeston, 21

homes

Policy: 3.8 Wollaton Road, Beeston, 12

homes

Policy: 11

Beeston Square, 100 homes (minimum)

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.

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.

We would ask for a Section 106 contribution to be





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.

Policy: 4.1 Awsworth

West of Awsworth (inside the bypass) 250 homes

Policy: 5.1 Brinsley

East of Church Lane 110 homes

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.

Policy: 6.1

Eastwood 200 homes + 30 Extra Care Units Walker Street, Eastwood (Map 24)

Land for Medical Centre required in order to make plan effective and therefore sound 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.

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.

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.

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-





located blue light service base. Funding contributions should be sought for this development through Section 106.
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.
1,7
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.

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





# Broxtowe Part 2 Local Plan



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Please provide your client's name		Mrs D Viitanen	
Your Details			
Title			
Name			
Organisation (f responding on behalf of the organisation)	Feathersto	nes	
Address			
Postcode			
Tel. Number			
E-mail address			

Comments should be received by 5.00pm on Friday 3<sup>rd</sup> 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 Policy 28: Green Infrastructure Assets Policy 29: Cemetery Extensions Policy 30: Landscape Policy 31: Biodiversity Assets Policy 32: Developer Contributions		Policy 2 Policy 3 Policy 4 Policy 5 Policy 6 Policy 7
Policies Map	j ez. zereseper continuationo		
Sustainability Appraisal			
Other (e.g. omission, evidence document etc.)	Yes, exclusion of sites.		

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

Do you consider this paragraph or policy of the Local Plan to be: (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		٧

# 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	٧	
It is not effective	٧	
It is not positively prepared	٧	
It is not consistent with national policy	٧	

#### Your comments

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

### Question 4: Modifications sought

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

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

#### Question 5: Public Examination Attendance

If your representation is seeking a modification, do you consider it necessary to particip public examination?	ate at the
Yes, I wish to participate at the public examination	٧
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 necessary	to be
We wish to participate at public examination to explore fully the concerns we have with the soundness of the Plan.	

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

## Featherstones

PLANNING • DESIGN • DEVELOPMENT

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

**Representations by FEATHERSTONES** 

on behalf of Mrs M Barnes

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

Each of these sites were allocated in the 2004 Plan.

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

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

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

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

## Site Location Plan – Land off Back Lane, Nuthall





## **BROXTOWE LOCAL PLAN PART 2: PUBLICATION VERSION**Representations by FEATHERSTONES on behalf of RICHARD TAYLOR

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

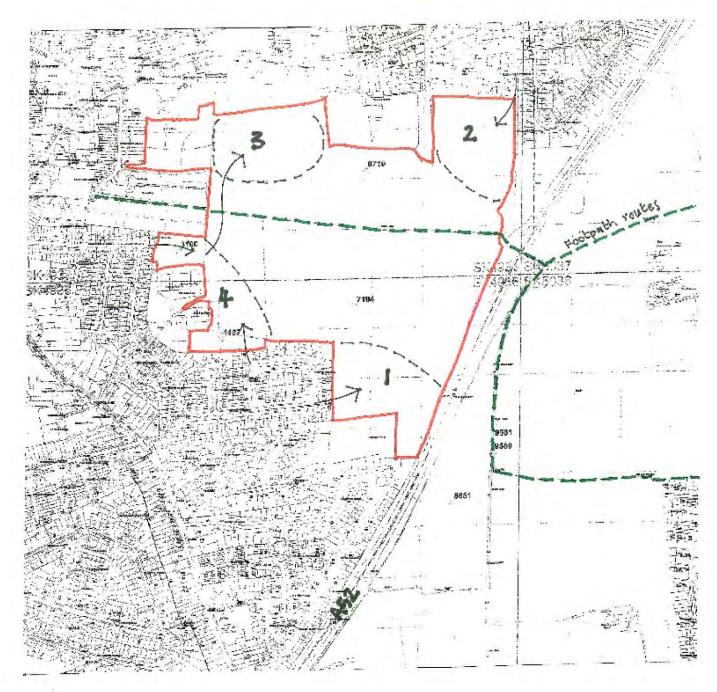
Each of these sites were allocated in the 2004 Plan.

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

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

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

# PLAN I OWNERSHIP



# PLAN 2 OPPORTUNITY

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





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

Representations by OXALIS PLANNING on behalf of W.WESTERMAN LTD

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

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

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

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

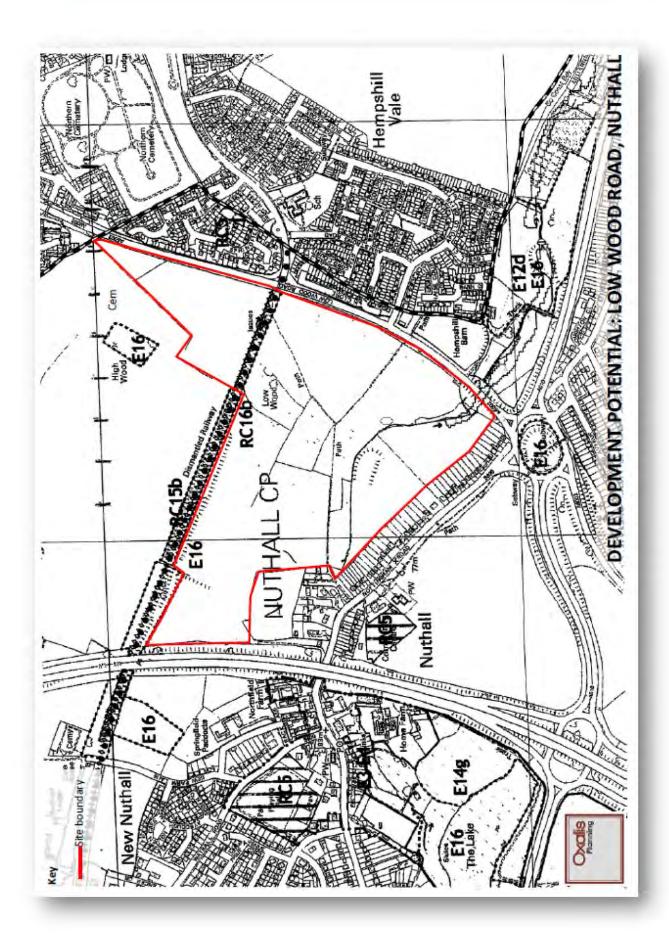
- a. Land at Beeston Maltings Policy 3.6, has been allocated since 2004. It remains a difficult and complex site and delivery is highly uncertain.
- b. Land in Awsworth includes land allocated since 2004 and although there is extant permission, delivery is not certain.
- c. Two sites in Eastwood were allocated in the 2004 Local Plan and delivery remains uncertain notwithstanding extant planning permission.
- d. Land at Walker Street, Eastwood Policy 6.1. This forms part of a school and recreation facility. Aside from its individual merits as an allocation, the site has been allocated (although a different part of the overall school site) since 2004 with no development progressing. Given the status of the site and wider uncertainty regarding school places and the quality and quantity of sports and recreation space, the delivery of the site is highly uncertain.
- e. Land south of Kimberley including Kimberley Depot Policy 7.1. The site is currently a refuse depot with refuse tip. It is unclear if new facilities have been found to facilitate relocation. Notwithstanding, the site will contain areas of contamination which could preclude or limit development. Delivery on the site is therefore uncertain.
- f. Land South of Eastwood Road, Kimberley Policy 7.2. This site has been allocated since 2004. Development of the site remains complex and delivery highly uncertain.
- g. Builders Yard, Eastwood Road, Kimberley Policy 7.3. This site has been allocated since 2004. Development on the site remains uncertain.
- 1.7 The uncertainty in Broxtowe stems principally from the sheer number of complex sites where the level of certainty regarding delivery is extremely low. In these circumstances there is not a sufficiently reasonable prospect that the minimum housing numbers will be achieved and the Plan is therefore unsound. The circumstances in Broxtowe are the very circumstances that have led the Local Plan Experts Group to recommend the introduction of appropriate lapse rates and a 20% reserve site allowance. To adopt the Plan in its current form would perpetuate the current and historic role the planning system has played in creating a crisis in housing through the lack of delivery of new homes.
- 1.8 The Government recognises that more needs to be done to ensure that the right numbers of houses are built. It's White Paper Fixing Our Broken Housing Market (February 2017) is aimed at just that. The White Paper draws on and makes reference to the work undertaken by the Local Plan Experts Group (LPEG). As well as proposing a new approach to calculating housing needs, the LPEG made recommendations as to how Local Plans should be approached not only to demonstrate a five year land supply but to ensure plans deliver over the whole plan period.
- 1.9 In their Report to Government (March 2016) the LPEG state that:

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

And they recommend that plans:

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

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



# Broxtowe Part 2 Local Plan



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Please provide your	client's name	Bloor Homes Ltd	
Your Details			
Title			
Name			
Organisation (f responding on behalf of the organisation)	Oxalis Planning Ltd		
Address			
D. J. J.			
Postcode			
Tel. Number			
E-mail address			

Comments should be received by 5.00pm on Friday 3<sup>rd</sup> 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:			

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

Document	Policy number	Page number	Policy text/ Paragraph number
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Policies Map	1 oney 32. Developer Continuumions		
Sustainability Appraisal			
Other (e.g. omission, evidence document etc.)	Yes, exclusion of sites and approach to Toton allocat	ion.	

### 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		٧

# 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	٧	
It is not effective	٧	
It is not positively prepared		
It is not consistent with national policy		

### Your comments

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

### Question 4: Modifications sought

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

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

### Question 5: Public Examination Attendance

If your representation is seeking a modification, do you consider it necessary to participate at the public examination?		
Yes, I wish to participate at the public examination	٧	
No, I do not wish to participate at the public examination		
If you wish to participate at the public examination, please outline why you consider this	to be	
necessary		
We wish to participate at public examination to explore fully the concerns we have with the soundness of the Plan.		

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



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

Representations by OXALIS PLANNING on behalf of BLOOR HOMES

#### **Contents**

### Representations:

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

### Appendices:

Appendix One: Site Location Plan and Illustrative Masterplan relating to land at

Nether Green, east of Mansfield Road, Eastwood

Appendix Two: Proposed Site allocation Boundary for Land at Toton

Appendix Three: 'Broxtowe Gateway' vision document produced by Oxalis

Planning April 2017

Appendix Four: 'Broxtowe: Gateway to the East Midlands' vision document

produced by Oxalis Planning March 2014

Appendix Five: 'Toton - Strategic Location for Growth' produced by Oxalis

Planning in December 2015

#### 1.0 Introduction

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

### 2.0 Housing Delivery

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

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

And they recommend that plans:

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

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

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

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

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

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

- a. Land at Beeston Maltings Policy 3.6, has been allocated since 2004. It remains a difficult and complex site and delivery is highly uncertain.
- b. Land in Awsworth includes land allocated since 2004 and although there is extant permission, delivery is not certain.
- c. Two sites in Eastwood were allocated in the 2004 Local Plan and delivery remains uncertain notwithstanding extant planning permission.
- d. Land at Walker Street, Eastwood Policy 6.1. This forms part of a school and recreation facility. Aside from its individual merits as an allocation, the site has been allocated (although a different part of the overall school site) since 2004 with no development progressing. Given the status of the site and wider uncertainty regarding school places and the quality and quantity of sports and recreation space, the delivery of the site is highly uncertain.
- e. Land south of Kimberley including Kimberley Depot Policy 7.1. The site is currently a refuse depot with refuse tip. It is unclear if new facilities have been found to facilitate relocation. Notwithstanding, the site will contain areas of contamination which could preclude or limit development. Delivery on the site is therefore uncertain.
- f. Land South of Eastwood Road, Kimberley Policy 7.2. This site has been allocated since 2004. Development of the site remains complex and delivery highly uncertain.
- g. Builders Yard, Eastwood Road, Kimberley Policy 7.3. This site has been allocated since 2004. Development on the site remains uncertain.
- 2.14 The uncertainty in Broxtowe stems principally from the sheer number of complex sites where the level of certainty regarding delivery is extremely low. In these circumstances there is not a sufficiently reasonable prospect that the minimum housing numbers will be achieved and the Plan is therefore unsound. The circumstances in Broxtowe are the very circumstances that have led the Local Plan Experts Group to recommend the introduction of appropriate lapse rates and a 20% reserve site allowance. To adopt the Plan in its current form would perpetuate the current and historic role the planning system has played in creating a crisis in housing through the lack of delivery of new homes.

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

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

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

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

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

Or

 If the Peveril scheme is implemented, a new masterplan approach and revised vision for land at Toton would be required to take account of the committed scheme. The committed scheme is fundamentally at odds with the Growth Strategy and it would prejudice its delivery. The strategy for the site would need to change. Additional land to the east of Toton Lane, would need to be introduced to help deliver the overarching aspirations for the site as set out in the East Midlands HS2 Growth Strategy.

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

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

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

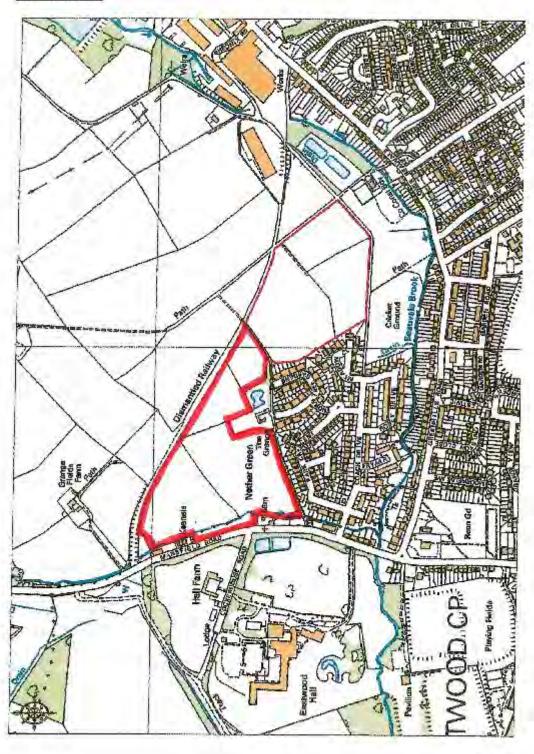
- 4.1 Bloor Homes object to bullet point 8 of Policy 15 which requires 5% of large sites to be delivered as self / custom build Homes. The delivery of self / custom build Homes as part of a large site creates complex delivery, design, Health and Safety and site management issues. On some sites it will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

### 5.0 Policy 17: Place – Making, Design and Amenity

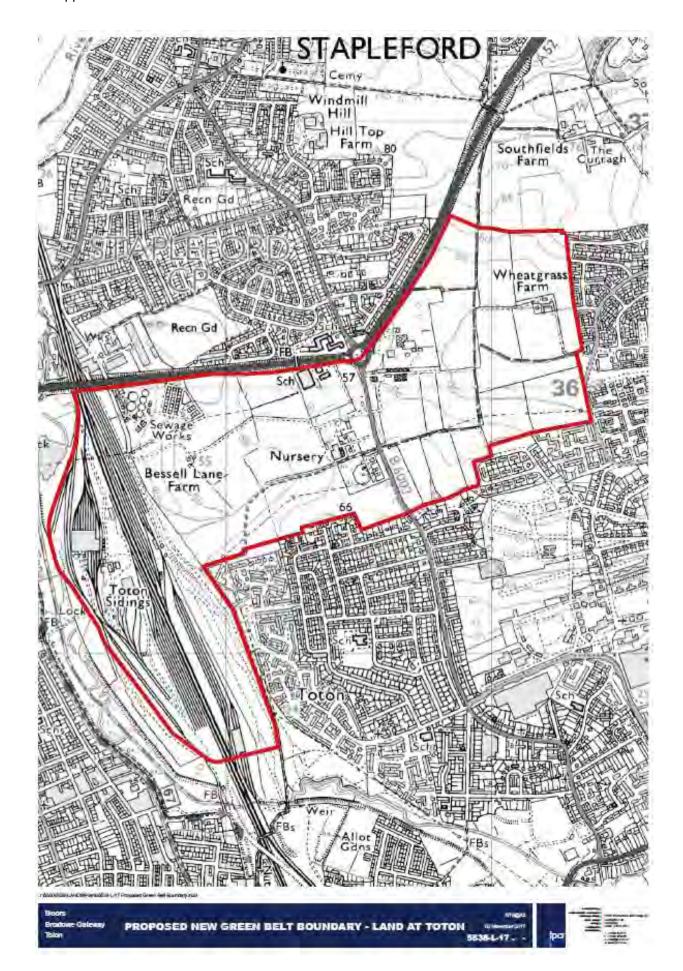
5.1 Some of the criteria within this design policy are misplaced and should be removed. Criteria 1b and 1c are both spatial policies concerned with the location of development as opposed to its form. These criteria should be deleted.

### Appendix One:

### Site location plan:







# **BROXTOWE GATEWAY**



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

April 2013











## **PREFACE**

Evecutive Cummery

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

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

This submission proposes an alternative, bolder vision.

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

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

Executive Summary	2
Introduction	4
Background & Context	6
WHY? - Why HS2 Is An Opportunity & Why The Council's Proposed Response Is Inadequate	8
WHERE? - An Alternative Broad Location For Growth	12
WHAT? - What Is The Proposed Vision For The Broxtowe Gateway?	18
Development Potential	20
Indicative Sketches	28
HOW? - How Should These Proposals And Vision Be Taken Forward?	32
Appendices	
I. Planning 34 II. Access & Highways 45 III. Landscape 50	

## **EXECUTIVE SUMMARY**

### Our Vision And Concept For The Broxtowe Gateway

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

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

Our vision and concept for the Broxtowe Gateway includes:

New works to eliminate traffic congestion;

Up to 4000 new jobs<sup>1</sup>;

Retention of the Green Belt north of Toton and Chilwell;

Up to 1200 dwellings alongside the NET

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

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

<sup>&</sup>lt;sup>1</sup> Based on HCA Employment Densities Guide, 2010 – assuming 50 acres developed at 20,000 sq.ft per acre, and 4 jobs per 1000 sq ft.'

### **Executive Summary - Plans**











## INTRODUCTION

#### HS<sub>2</sub>

High Speed Rail is coming to Broxtowe.

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

It will mean jobs and investment.

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

As set out in this Vision document, with a strategic, employment led response to HS2, Broxtowe could see up to 4,000 jobs<sup>2</sup> in a new growth area associated with the station hub.

<sup>&</sup>lt;sup>2</sup> Based on the HCA's 'Employment Densities Guide', 2nd Edition, 2010.



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

## **BACKGROUND & CONTEXT**

### **Greater Nottingham & The Wider Region**

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

The Government has looked internationally and seen the benefits and opportunities high speed rail can bring<sup>3</sup>. HS2 is seen as an opportunity to "connect the historic powerhouses of the Midlands and the North and enable them to develop into a vibrant and competitive unit to counterbalance the South East"<sup>4</sup>. However, Government also recognises that while providing the significant national investment in the infrastructure is vital,

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

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

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

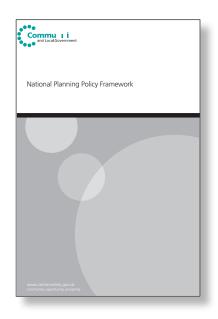
The National Planning Policy Framework (NPPF) provides clear and positive guidance on the importance of planning for economic growth. It emphasises the importance of a positive approach to meeting development needs and requires the planning system to "respond positively to wider

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

<sup>&</sup>lt;sup>4</sup> 'High Speed Rail: Investing in Britain's Future Phase Two, the route to Leeds, Manchester and beyond', Dept for Transport, January 2013.

<sup>&</sup>lt;sup>5</sup> Para 3.5.9, 'Economic Case for HS2: Updated appraisal of transport user benefits and wider economic benefits', HS2 Ltd, for Dept for Transport.

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



"Local Plans should indicate broad locations for strategic development."

NPPF, para 157

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

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

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

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



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

#### The National Vision

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

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

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

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

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

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

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

HS2 Ltd

### The Local Opportunity

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

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

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

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

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

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

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

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

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

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

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

<sup>&</sup>lt;sup>6</sup> Para 3.5.9, 'Economic Case for HS2: Updated appraisal of transport user benefits and wider economic benefits', HS2 Ltd, for Dept for Transport.

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

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

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



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

# WHERE?

### **An Alternative Broad Location For Growth**

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

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

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

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

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

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

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

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

> "Although this is a strategic Green Belt gap...the NET extension is projected to terminate here, strengthening the case for some development here":

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

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

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

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

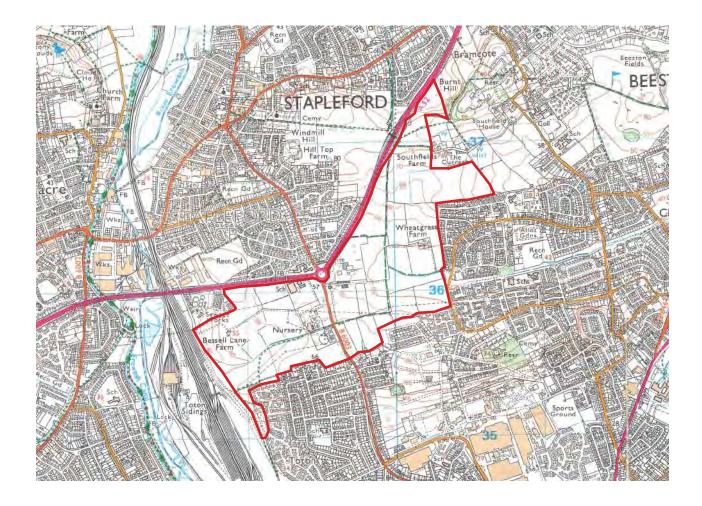
<sup>&</sup>lt;sup>7</sup> Greater Nottingham Sustainable Locations for Growth, Tribal, Feb 2010.

are instead important factors that can and could be used positively to shape suitable development

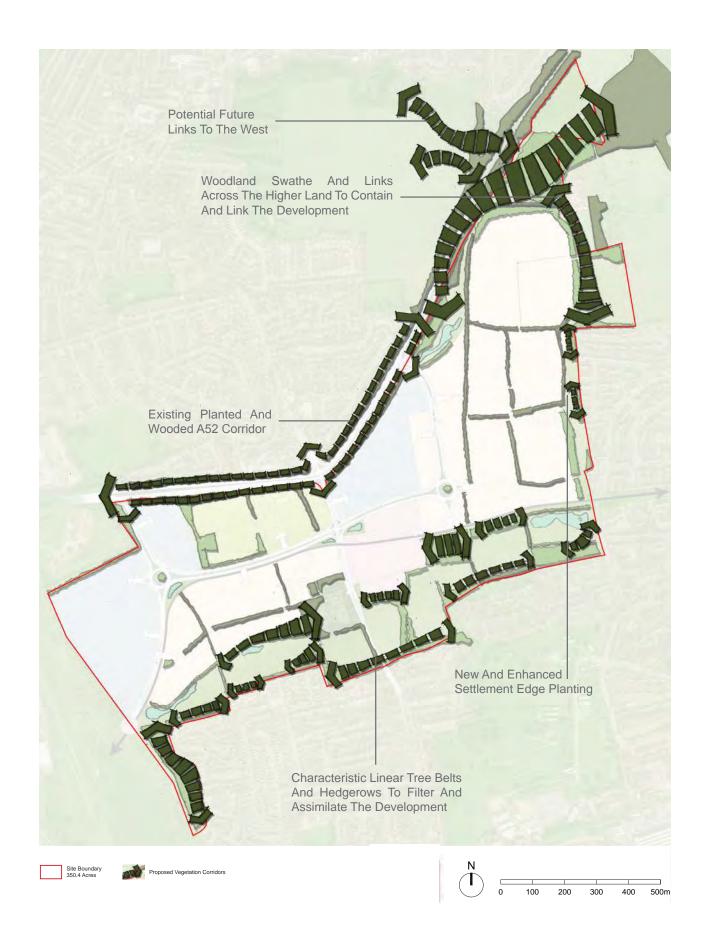
at this location. A high quality response to these issues should realise the creation of a distinctive new place drawn from a clear understanding of the existing environment, and both current and planned future changes.

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

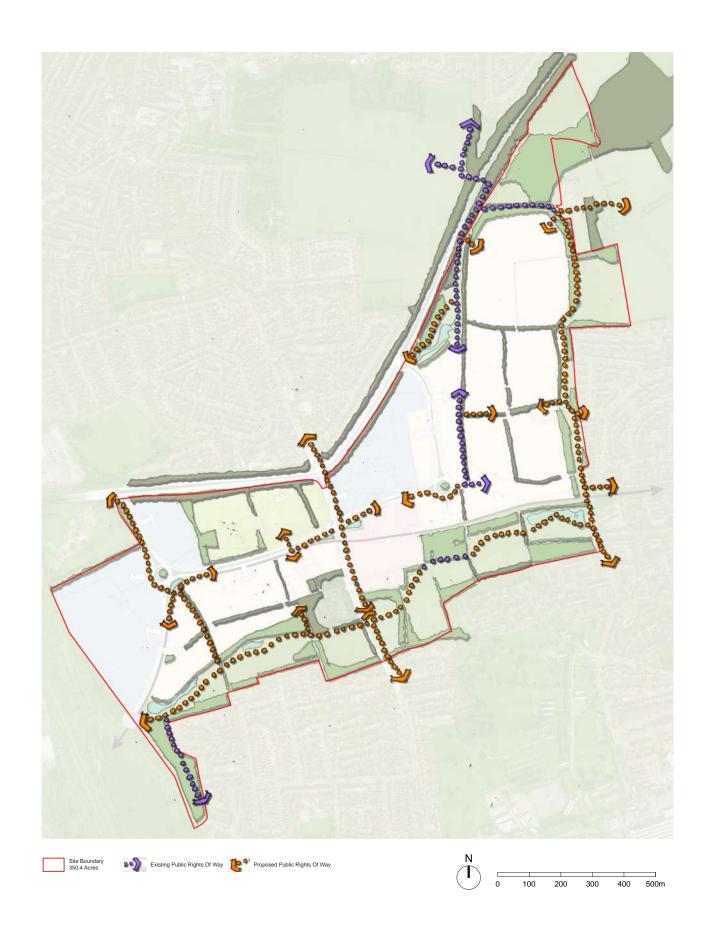
The vision assumes the adoption of best practice 'placemaking' principles, maximising environmental and recreational opportunities, and minimising any perceived strategic or other landscape effects.



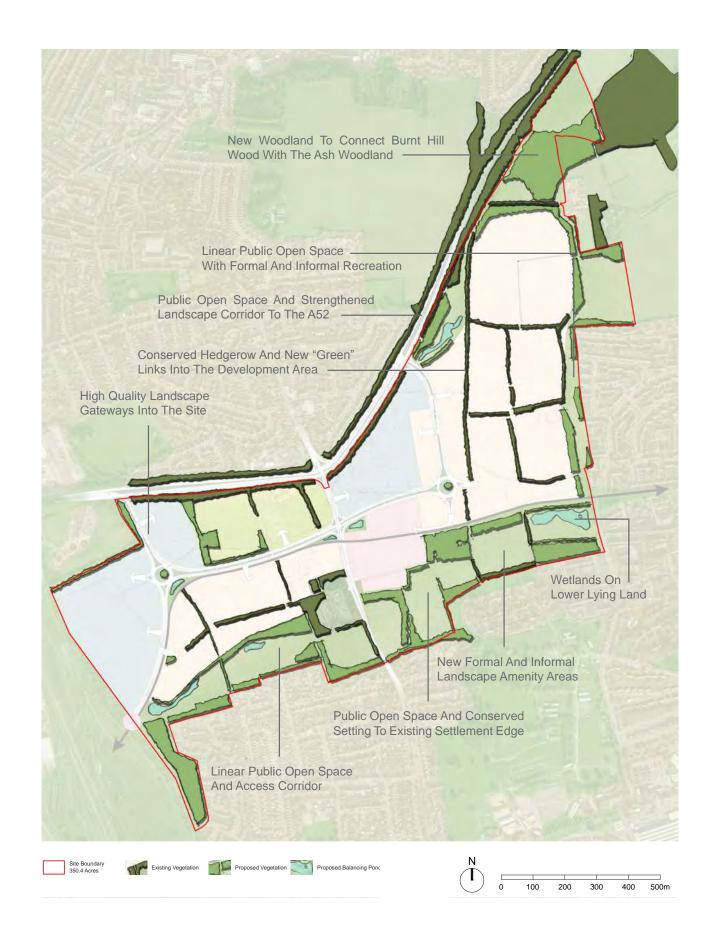
### **Vegetation Corridor Plan**



### **Public Rights Of Way Plan**



### **Green infrastructure Plan**



## WHAT?

### What Is The Proposed Vision For The Broxtowe Gateway?

Our proposal is bold and ambitious.

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

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

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

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

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

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

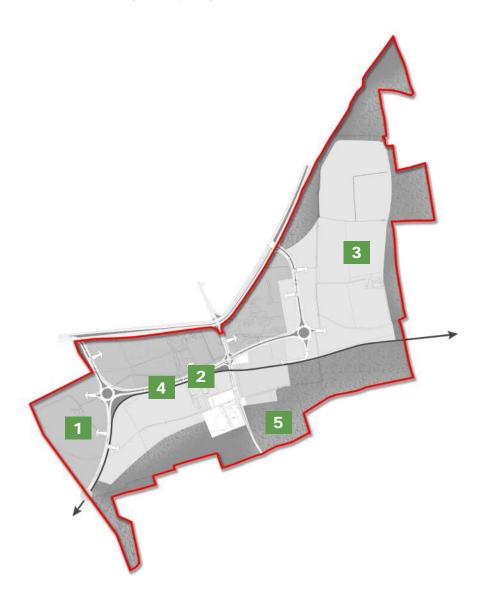
"Eliminate existing traffic congestion."

(Appendix ii, Access Technical Note)

## **DEVELOPMENT POTENTIAL**

The concept plan incorporates the following fundamental elements:

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



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

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

## **Development Potential Plan**



#### **Reconfigured Highway Junctions**

#### Junction 1 – Bardills Cross-Roads

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

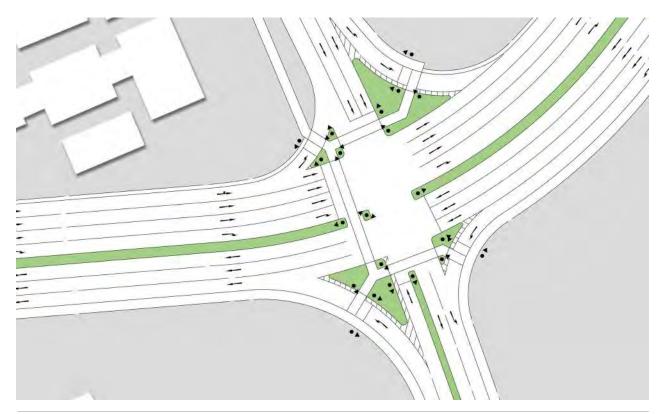
All right-turns would be banned at the new cross-roads. This would be enforced through the use of cameras and will enable the junction's traffic lights to operate in a simple two-phase manner, greatly increasing efficiency and capacity. As a result, modelling shows that the junction will be able to accommodate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

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

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

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

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

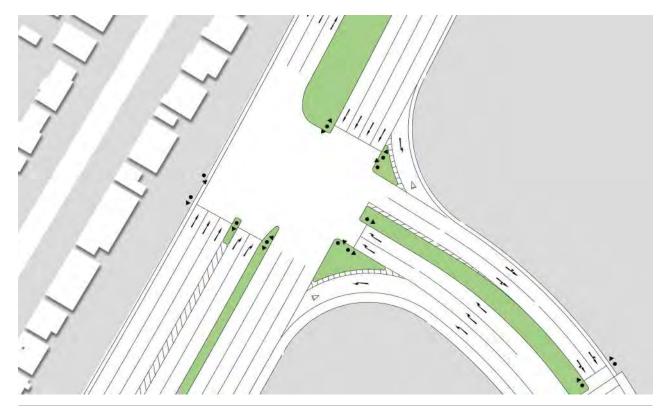


Junction 1 – Bardills Cross-Roads - Not To Scale

#### **Junction 2 – Site Access (East)**

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

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

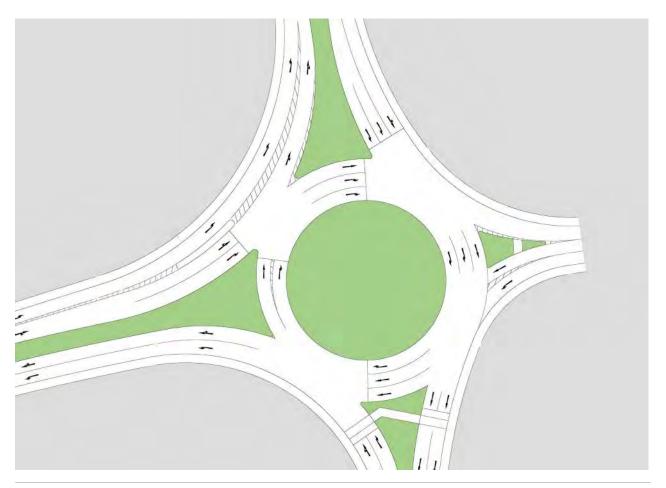


Junction 2 - Site Access (East) - Not To Scale

#### **Junction 3 - NET Access Roundabout**

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

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



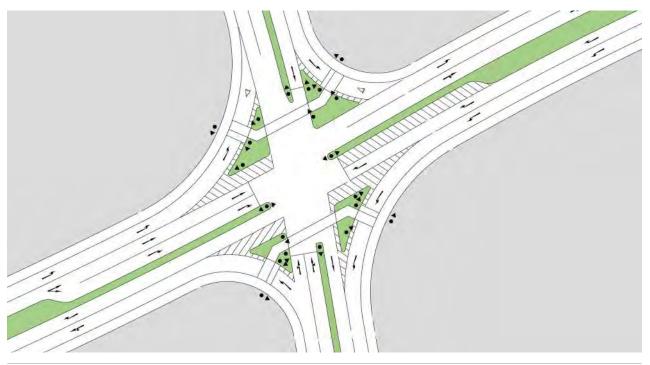
Junction 3 – NET Access Roundabout - Not To Scale

#### **Junction 4 – Site Access (South)**

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

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

#### Existing and future traffic congestion would be eliminated.

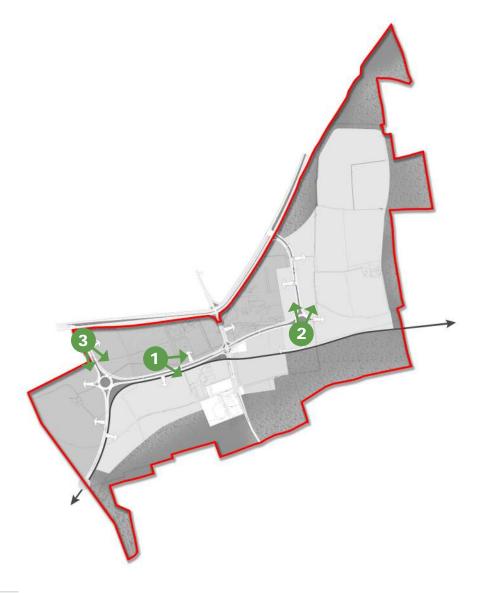


Junction 4 - Site Access (South) - Not To Scale

# **INDICATIVE SKETCHES**







Numbers Indicate Sketch Viewpoints On Pages 29-31

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

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



Sketch Viewpoint 1 - NET Integration

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

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



Sketch Viewpoint 2 - New Highways Infrastructure

As a key gateway location, high quality, modern office employment space will ensure an appropriate environment for inward investment.

Employment space will be focussed adjacent to the HS2 station.

Sketch Viewpoint 3 - Employment Space

# HOW?

#### **How Should These Proposals And Vision Be Taken Forward?**

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

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

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

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

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

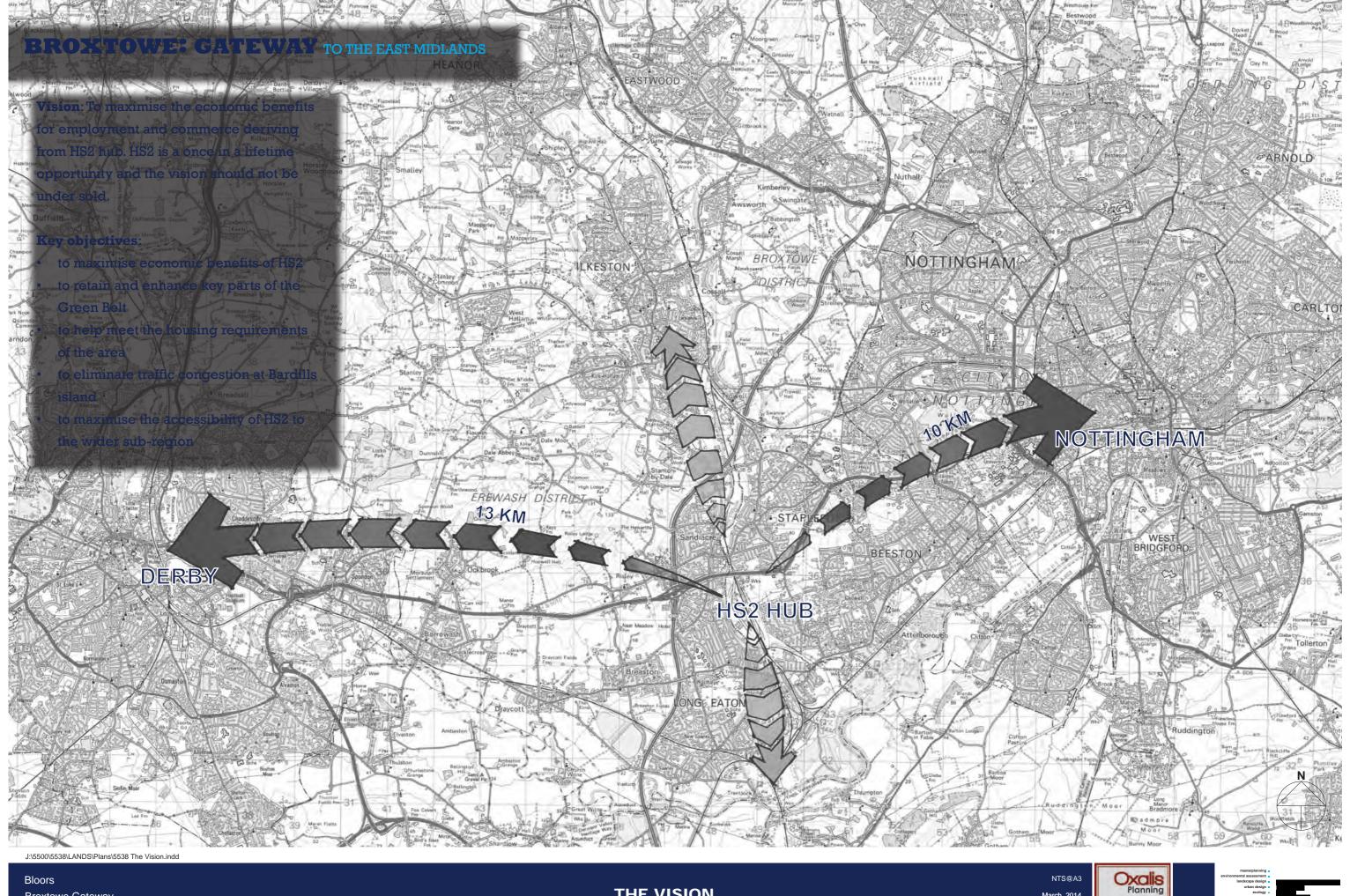
As referred in the previous section, we consider that this location provides a more sustainable and appropriate location to contribute towards Broxtowe's and the wider Housing Market Area's

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

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

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

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

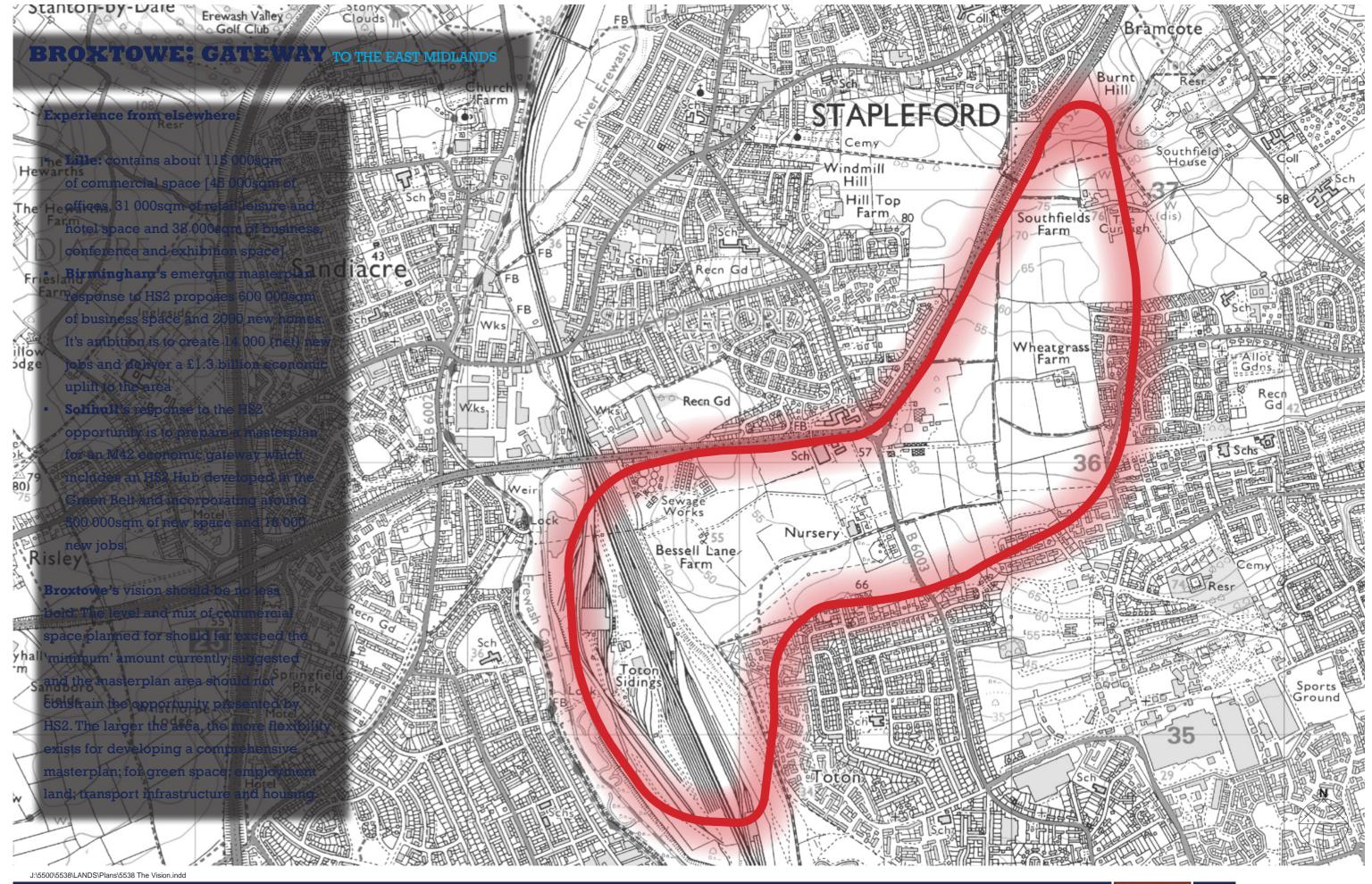


Bloors **Broxtowe Gateway** Toton

NTS@A3 March 2014







THE SITE

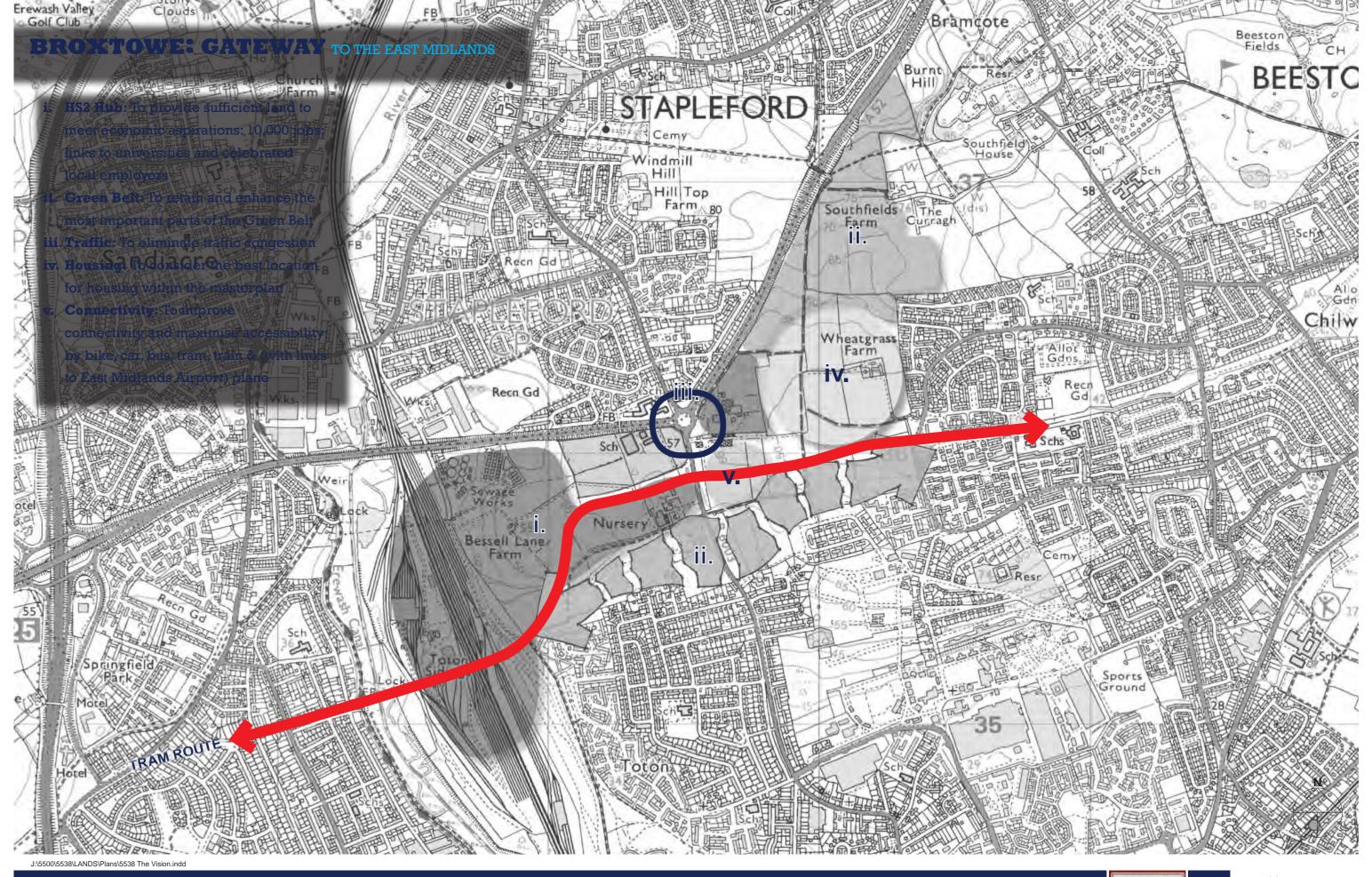
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Broxtowe Gateway
Toton

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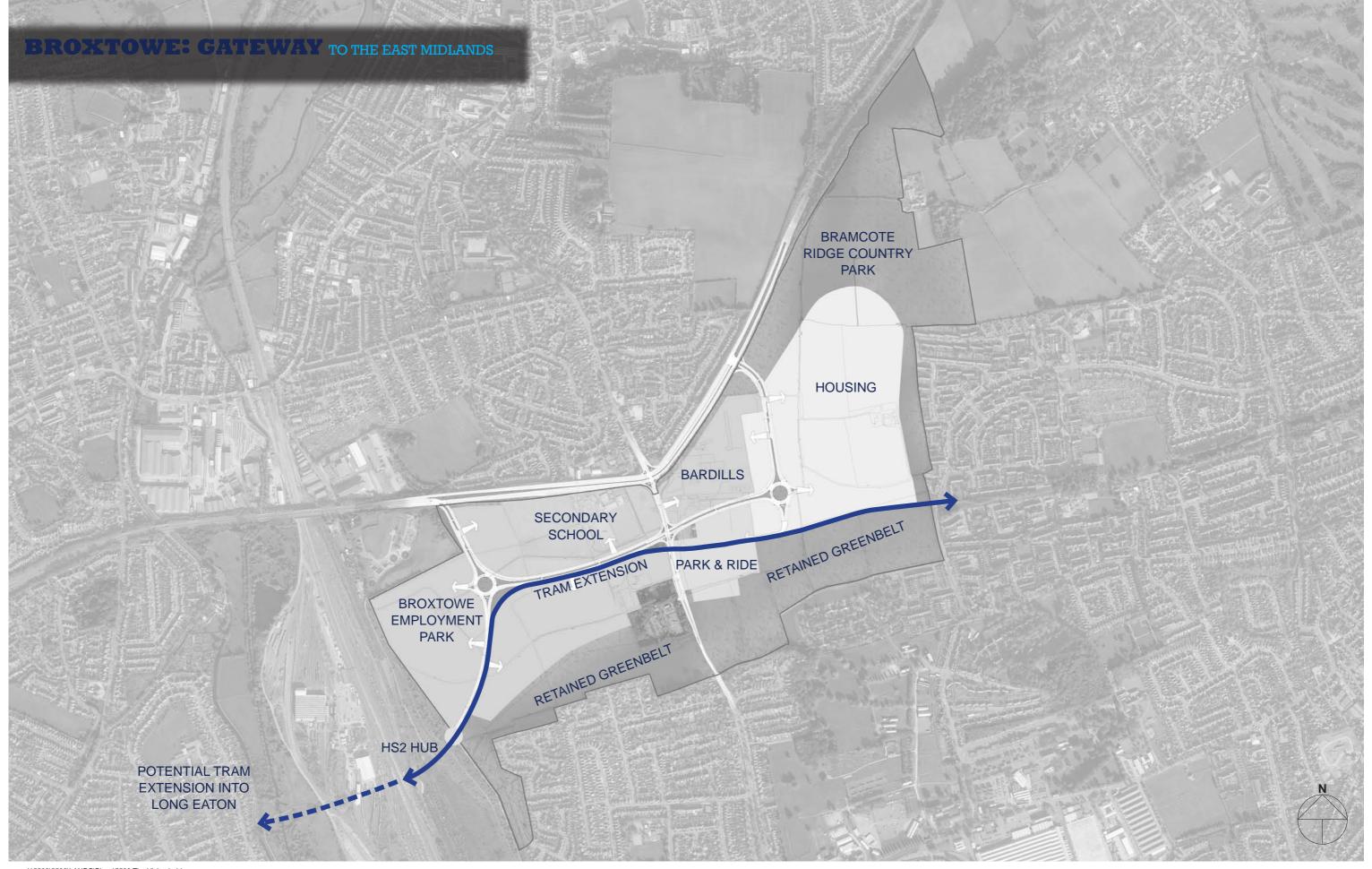




Bloors **Broxtowe Gateway** Toton

Oxalis Planning March 2014





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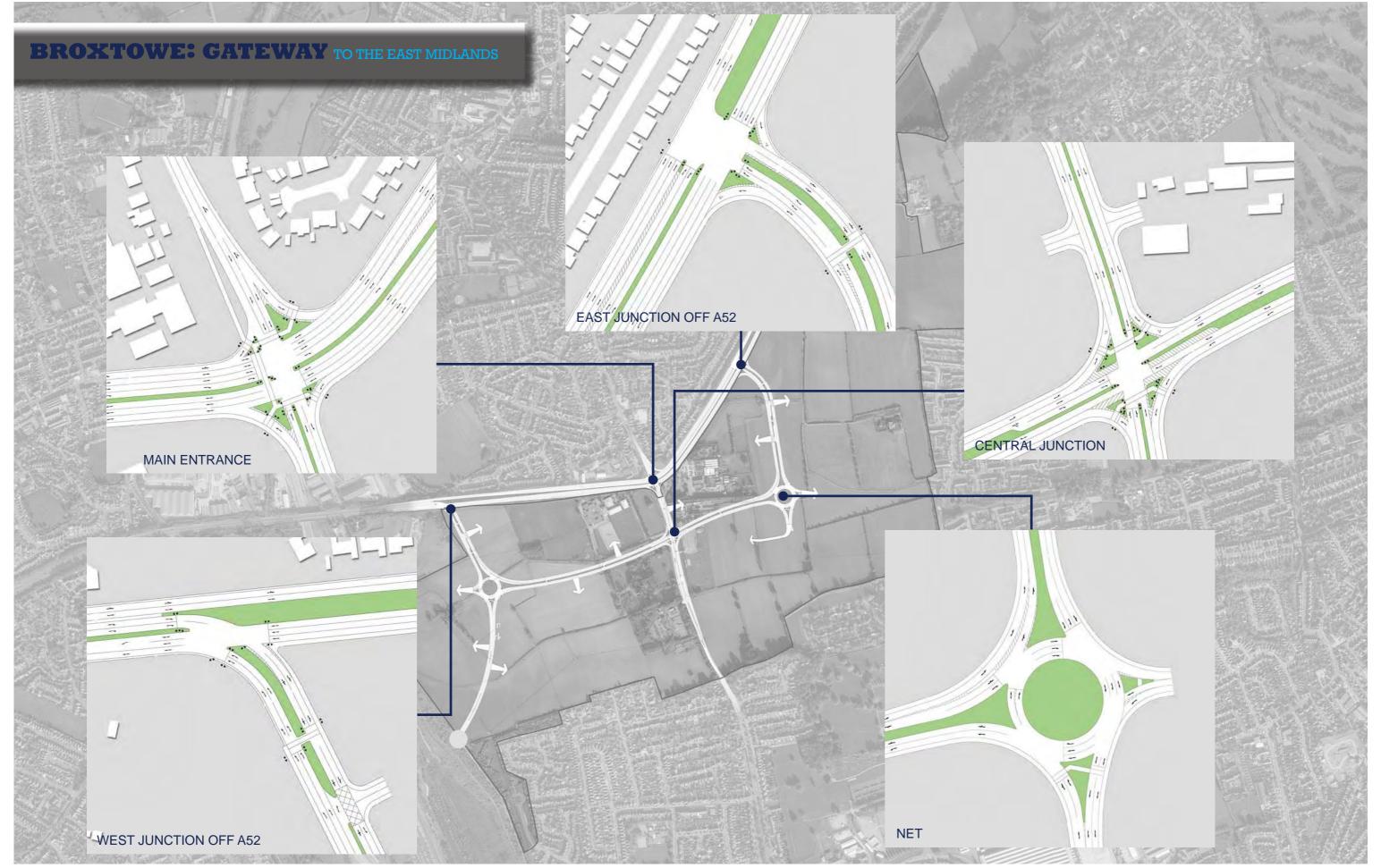


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March 2014







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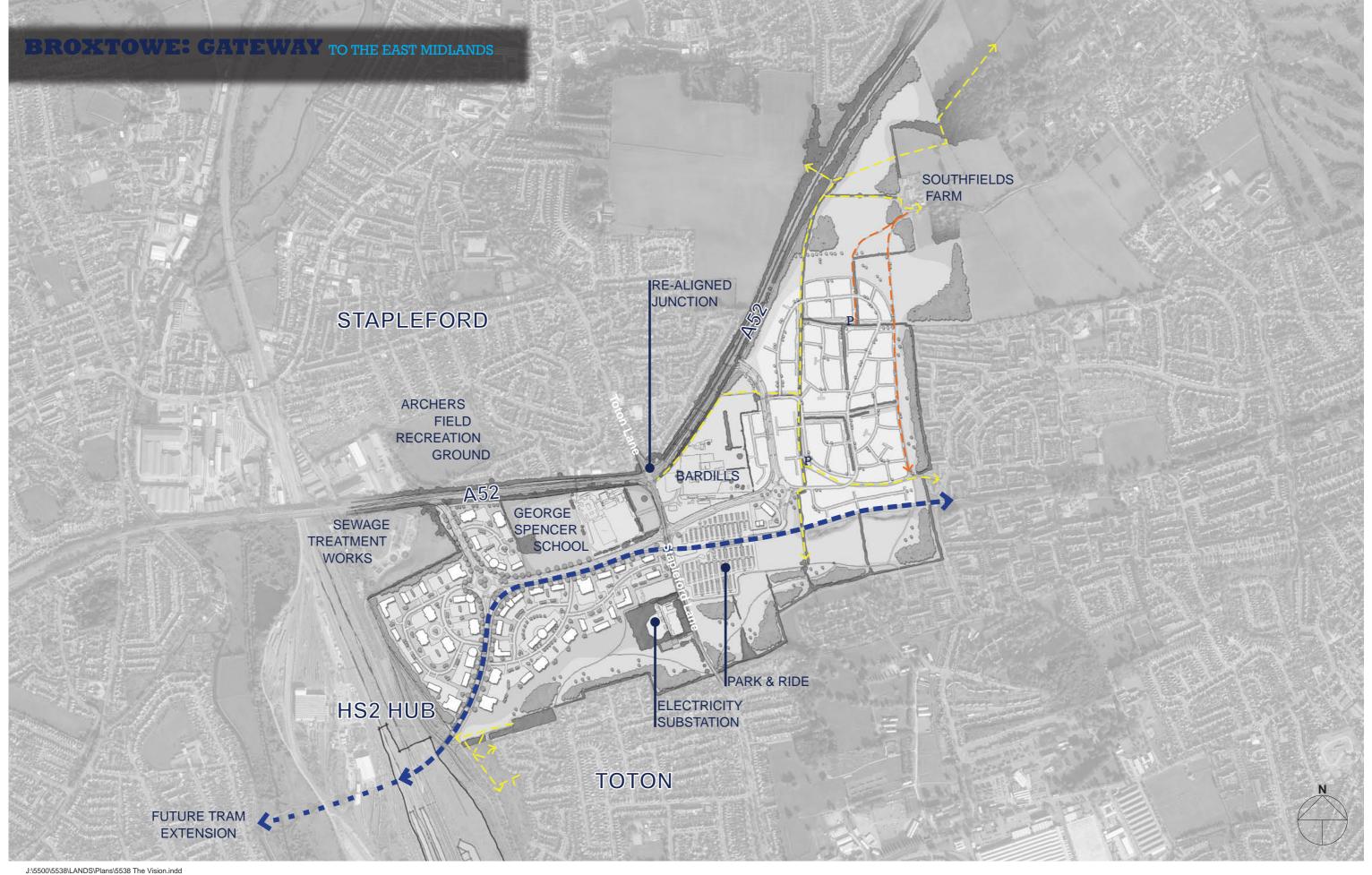
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Broxtowe Gateway

# TOTON: STRATEGIC LOCATION FOR GROWTH

AN ALTERNATIVE RESPONSE TO THE UNIQUE OPPORTUNITIES PRESENTED BY HS2

THE VISION:

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

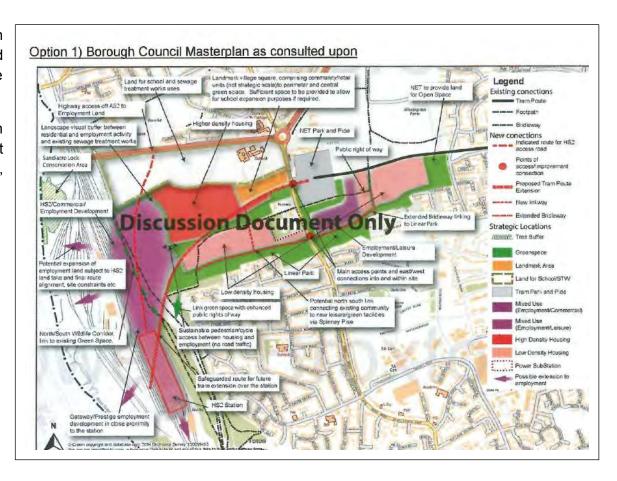
TO PROVIDE THE FRAMEWORK TO DELIVER A WORLD-CLASS DEVELOPMENT OF REGIONAL SIGNIFICANCE IN RESPONSE TO THE UNIQUE LOCATIONAL OPPORTUNITIES AT TOTON, PRESENTED BY HS2, MAINLINE RAIL CONNECTIONS, THE TRAM AND STRATEGIC ROAD LINKS"





#### **BACKGROUND:**

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



#### **CONCERNS WITH THE EMERGING APPROACH:**

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

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

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



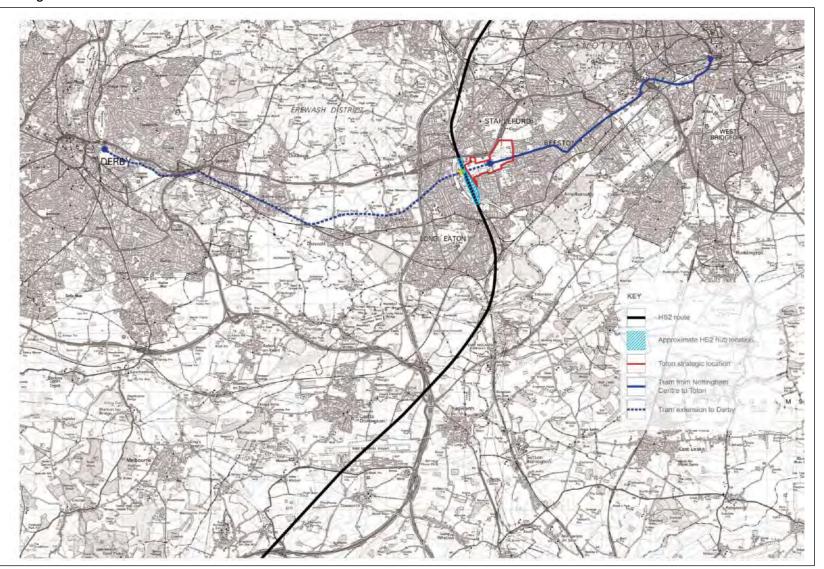
#### **AN ALTERNATIVE APPROACH:**

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

#### **ENVIRONMENTAL IMPACT:**

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

#### Strategic Location





#### AN ALTERNATIVE MASTERPLAN

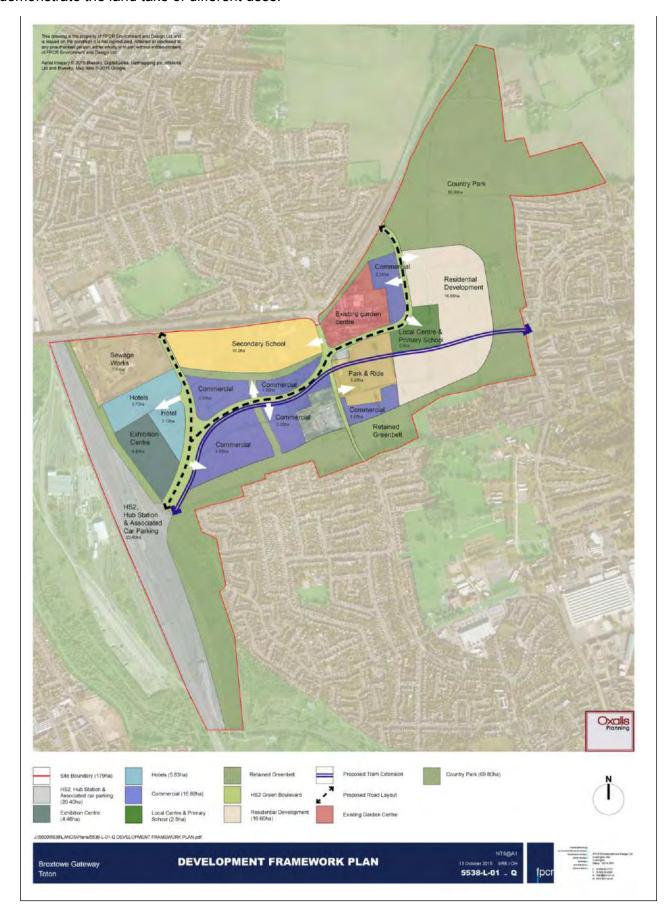
- Oxalis have prepared alternative Masterplan options for Toton, which are intended to stimulate discussion.
- The approach in each options seeks to accord with the Core Strategy minimum land use requirements, but to maximise the amount of commercial space immediately adjacent to HS2 and to provide a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

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



**MASTERPLAN FOR DISCUSSION - OPTION ONE** 

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







## **MASTERPLAN FOR DISCUSSION - OPTION TWO**

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





# Broxtowe Part 2 Local Plan



Agent

Please provide your client's name		TAYLOR & BURROWS PROPERTY		
our Details				
Title				
Name				
Organisation (if responding on behalf of the organisation)	Phoenix Planning	g (UK) Limited		
Address				
Postcode				
Tel. Number				
E-mail address				

Comments should be received by 5.00pm on Friday 3<sup>rd</sup> 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: <a href="mailto:policy@broxtowe.gov.uk">policy@broxtowe.gov.uk</a>

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

	Policy number	Page number	Policy text/ Paragraph number
	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		71.
	Policy 5: Brinsley Site Allocation		
	Policy 6: Eastwood Site Allocation		F.
	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		
Ę	Policy 13: Proposals for main town centre uses in		
Part 2 Local Plan	edge-of-centre and out-of-centre locations		
<u>-</u>	Policy 14: Centre of Neighbourhood Importance		
ल	(Chilwell Road / High Road)		
8	Policy 15: Housing size, mix and choice		
ĭ	Policy 16: Gypsies and Travellers		
2	Policy 17: Place-making, design and amenity		
+	Policy 18: Shopfronts, signage and security measures		
ਰ	Policy 19: Pollution, Hazardous Substances and		
<b>a</b>	Ground Conditions		
	Policy 20: Air Quality Policy 21: Unstable land		
	Policy 21: Offstable faild 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: (please refer to the guidance note at for an explanation of these terms)			
2.1	Legally compliant		
2.2	Compliant with the duty to co-operate		
2.3	Sound		х

# 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	х		
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.

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> <li>A Listed building and memorial garden is present on site which may impact upon land availability.</li> <li>The site holds historical importance with regards to the military. This issue needs further consideration prior to redeveloping the site.</li> <li>Previous industrial uses present and therefore potential for contamination within the site.</li> <li>Significant level changes across the site which may impact upon density.</li> <li>Detailed masterplan required to show that the constraints have been taken into consideration and that this site can accommodate 500 dwellings.</li> <li>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.</li> </ul>			
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> <li>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.</li> <li>Significant local objection to the release of this green belt site including the Bramcote Neighbourhood Forum.</li> <li>The site lies adjacent to a landfill site. Potential for contamination issue that does not appear to have been fully evaluated.</li> <li>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.</li> </ul>			
Stapleford (West of Coventry Lane )	240	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			

		green belt sites available within Eastwood that would align with the Core Strategy and should be released before this site.  - 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> <li>Ecological impacts of development upon Beeston Canal Wildlife Site.</li> <li>Potential contamination issues from the land fill site. This issue does not seem to have been fully considered</li> </ul>
Beeston Maltings	56	<ul> <li>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.</li> <li>Development could result in potential harm to an area including         non-designated heritage assets in Dovecote Lane area.</li> <li>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.</li> </ul>
Beeston Cement Depot	21	- 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:

SITE	NUMBER OF DWELLING	ISSUES
Works, Bailey Street, Stapleford	15 dwellings	<ul> <li>Outline consent approved in 2012 which has now lapsed and has not been renewed. No certainty that this site will come forward for development.</li> <li>Contamination issues and adjacent existing uses may impact upon the marketability of this site and therefore question is raised with regards to its deliverability.</li> <li>Site should be removed from housing supply</li> </ul>
Wadsworth Road, Stapleford	11 dwellings	<ul> <li>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.</li> </ul>

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 public examination?	to participate at the
Yes, I wish to participate at the public examination	V
No, I do not wish to participate at the public examination	
If you wish to participate at the public examination, please outline why you connecessary	nsider this to be
There are issues of how far the Plan still aligns with the Core strategy that it claims t it's approach appears at odds with that document.  The growth and regeneration of Eastwood is a matter which would benefit from a routhe merits of various sites and alternatives.	10 10 10 10 10 10 10 10 10 10 10 10 10 1

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.