

Policy 3.4 – Stapleford (West of Coventry Lane):

ID	Organisation
Duty to Co-operate / Interest Groups	
18	Nottinghamshire Campaign to Protect Rural England (supported by Nottinghamshire Campaign for Better Transport)
34	Nottinghamshire Wildlife Trust
211	Nottinghamshire County Council
222	Severn Trent
6276	Nottingham West Clinical Commissioning Group
64	Derbyshire County Council
73	Stapleford Town Council
2316	MacRae
6882	Broxtowe Labour Group
Developer / Landowner	
718	Planning and Design Group
1462	GraceMachin Planning & Property
6048	Barton Willmore
4200	Taylor & Burrows Property (Represented by Phoenix Planning (UK) Ltd)
Individual / Local Resident	
720	Pearson
1060	Campbell
1485	Steel
1494	Turville
2565	Johnson
3536	Jones
5951	Nathanail (2)
6056	Hill L
6057	Hill M
6908	Needham

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

Nottinghamshire Campaign to Protect Rural England

3rd November 2017

Please contact

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

<p>28 (Green Infrastructure)</p>	<p>This policy is also supported by Nottinghamshire Campaign for Better Transport.</p> <p>We welcome the inclusion of informal and amenity Green Infrastructure and the requirement to enhance these. However, there is a significant risk to the implementation of the policy in practice if the proposed wording is retained :</p> <p>“2.In all cases listed in part 1, and in the case of school playing fields, permission will not be granted for development that results in any harm to the Green Infrastructure Asset, <u>unless the benefits of development are clearly shown to outweigh the harm.</u>” (our emphasis)</p> <p>The lack of clarity as to what would constitute a benefit and for whom leaves so much room for interpretation as to undermine the overall policy intention. This would make this aspect of the Local Plan <u>unsound.</u></p>	<p>reword the policy by deleting “unless the benefits of development are clearly shown to outweigh the harm”.</p>
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Planning Policy
Broxtowe Borough Council
Council Offices
Foster Ave
Beeston
Notts NG9 1AB

3rd November 2017

Dear Sir/ Madam

Comments on Publication Version Part 2 Broxtowe Local Plan

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

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

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

Our comments on individual policies are set out below:

Policy 3 Main built up area site allocations

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

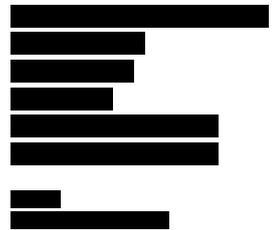
Policy: 3.1 Chetwynd Barracks: 500 homes (within the plan period)

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

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



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Modification sought

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

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

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

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

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

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

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

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

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

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

Modification sought

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

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

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

LWSs are defined areas identified and selected locally for their substantive nature conservation value. Their selection takes into account the most important, distinctive and threatened species and habitats within the county. They therefore comprise many of our best remaining flower-rich meadows, ancient woodlands, ponds, swamps, fens and mires and provide a home to many of our native plant and animal species, including many rare, declining or protected species. These sites can be of SSSI quality or can be even more important than SSSIs for wildlife. We therefore consider protection of this network of sites to be of the utmost importance.

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

Modification sought

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

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

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

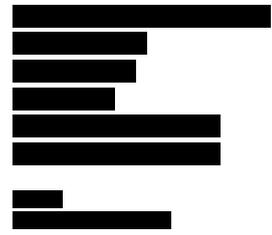
Whilst we **object** to this allocation because we consider it is encroaching significantly into the surrounding countryside and that local needs have been met by the adjacent Fields Farm site, achievement of a strong corridor is very important. We also agree with the last point of the 'key development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

Modification sought

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



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

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

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

Modification sought

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

Policy: 3.6 Beeston Maltings: 56 Homes

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

Modification sought

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

Policy: 3.7 Beeston Cement Depot: 21 Homes

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

Modification sought

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

Policy 4 Awsworth Site Allocation

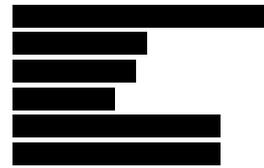
A substantial population of common toad (Local Biodiversity Action Plan Priority species and NERC Act species of principal importance in England) was known to be present in the vicinity of the allocated site. We are aware that toad tunnels, which we understand have not been maintained, were installed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

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

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



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Modification sought

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

Policy 5 Brinsley Site Allocation

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

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

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

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

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

Modification sought

Replace this site allocation with ‘option 2’.

Policy 6 Eastwood Site Allocation

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

Modification sought

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

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Policy 7.1 Land south of Kimberley Depot

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

Modification sought

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

Policy 7.2 Land south of Eastwood Road Kimberley

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

Modification sought

Site to be excluded.

Policy 17 Place-making, Design and Amenity

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

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

Modification sought

Under n) adding reference to following:

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

Under p) adding a reference to insect houses.

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

Policy 19 Pollution, Hazardous Substances and Ground Conditions

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

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

Policy 27 Local Green Space

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

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

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

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

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

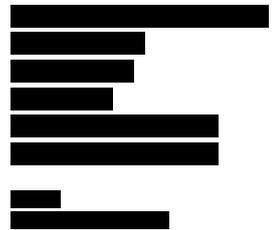
- "Corridors should be preserved, enhanced and provided, [...], as they permit certain species to thrive where they otherwise would not. Corridors should be as wide and continuous as possible" (Dawson, 1994).
- 50m buffers [are] recommended for developments in the Local Plans of both Wakefield & Darlington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

References

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



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

Modification sought

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

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

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

Policy 28 Green Infrastructure Assets

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

Policy 29: Cemetery extensions

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

Policy 31: Biodiversity Assets

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

1. Any reference to UK priority species and habitats (formerly called UK BAP priority species and habitats). Section 41 of the Natural 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 queries.

Yours sincerely

██████████
██
Nottinghamshire Wildlife Trust



**Nottinghamshire
Wildlife Trust**

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Details

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

Policy relates to

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

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

Question 2

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

Additional details

<p>Please give details of why you consider this part of the Local Plan is not legally compliant, is unsound or does not comply with the duty to co-operate. Alternatively, if you wish to support any of these aspects please provide details.</p>	<p>Policy 4.1 section 4.5 of the P2LP explains that access to the site is expected from Awsworth Bypass yet this is only to be considered as a last resort and wouldn't be favoured by the highway authority. The IDP on page 75 explains the highway authorities position. This appears inconsistent with the policy in the P2LP.</p> <p>NCC would be very grateful for your thoughts on the apparent discrepancies and inconsistencies between the two consultation documents.</p>
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Question 4

Question 4: Modifications sought

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

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

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

Question 5

Question 5: Public Examination Attendance

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

Yes

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

To help contribute to the discussion and help clarify any points raised for the Planning Inspector.

Broxtowe Borough Council

Potential impact of proposed developments on sewerage infrastructure assets

Date: 17/10/2017

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

For most new development provided the surface water is 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 provide additional capacity until there is certainty that the development is due to commence. Where development proposals are likely to require additional capacity upgrades to accommodate new development flows it is highly recommended that potential developers contact Severn Trent as early as possible to confirm flow rates and intended connection points. This will ensure provision of additional capacity can be planned into our investment programme to ensure development is not delayed.

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

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

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

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

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

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

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

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

30 October 2017

Dear Steffan

Broxtowe Local Plan Part 2 Consultation

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

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

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

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

Potential Site Allocations Sites Adjacent to the Main Urban Area

<p>Policy: 3.1 Chetwynd Barracks 500 homes with potential for 800+ overall</p> <p>Land for Medical Centre required in order to make plan effective and therefore sound</p>	<p>The potential for 800+ dwellings (with a maximum of 1,500) presents significant concern with respect to local health service provision. The nearest facilities for this development, and where patients are likely to register, is Chilwell Valley & Meadows Surgeries which comprise a main surgery (Valley) which has no development potential; and a branch surgery (Meadows) which has some expansion potential.</p> <p>Based on 2.3 residents per dwelling we would anticipate an increased patient population of up to 3,500 patients if the total of 1,500 dwellings was achieved, which would require 2 full-time General Practitioners, over and above the current service provision.</p> <p>Given the size of this development and the potential for further development at Toton, together with the limited / non-existent expansion potential of the current facilities, we are to consider the option of a new Primary Care Centre for the Chilwell / Toton area subject to funding being made available. Therefore, in order for the plan for Chetwynd Barracks to be effective and sound, we request a reserved site within this development to provide primary care services to the residents of this area.</p> <p>We are not in a position to confirm the size of site required at this stage; however based on similar size developments it would be no more than 1 acre to serve a potential population of around 18,000 patients. Funding contributions should be sought through Section 106.</p>
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<p>Policy: 3.2 Toton – 500+ homes</p>	<p>We understand that we have missed the opportunity to comment on this proposal as it stands currently at 500 homes. However, we consider that there may be further development in this area and would like to offer the following comments:</p> <p>The nearest facilities for this development is Chilwell Valley & Meadows Surgeries which comprise a main surgery (Valley) which has no development potential; and a branch surgery (Meadows) which has some expansion potential.</p> <p>We would like to consider any expansion to the Toton development over and above the original 500 houses alongside the Chetwynd Barracks development which</p>
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	affects the same GP practice.
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<p>Policy: 3.3 & 3.4</p> <p>Bramcote, East of Coventry Lane 300 homes</p> <p>Stapleford, West of Coventry Lane 240 homes</p>	<p>The nearest facilities to these developments are Bramcote Surgery and Hickings Lane Medical Centre.</p> <p>Hickings Lane Medical Centre has recently extended the surgery to take account of the new resident population generated by 450 dwellings (a potential of 1,035 residents based on 2.3 residents per dwelling) at Field Farm. There is potential to further expand this facility.</p> <p>Bramcote Surgery is a purpose built facility with some potential for small scale development which could assist with the expansion of patient population from these two developments.</p> <p>We are also aware of discussions regarding the development of the old Bramcote Hills Golf Course for retirement / continuing care privately owned units. This will, if it goes ahead, compound capacity issues within the existing practices.</p> <p>We ask the Borough Council to request on our behalf a Section 106 contribution to support the expansion to the physical capacity of these existing facilities in order to provide health services to the additional 1,242 residents these developments will attract.</p>
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<p>Beeston (339 homes / 780 residents)</p> <p>Policy: 3.5 Seven Trent (Lilac Grove), Beeston 150 homes</p> <p>Policy: 3.6 Beeson Maltings, 56 homes</p> <p>Policy: 3.7 Cement Depot Beeston, 21 homes</p> <p>Policy: 3.8 Wollaton Road, Beeston, 12 homes</p> <p>Policy: 11 Beeston Square, 100 homes (minimum)</p>	<p>There are four GP practices providing healthcare to the residents of Beeston; Abbey Medical Centre, The Manor Surgery, The Oaks Medical Centre and West End Surgery.</p> <p>The Oaks Medical Centre is currently undergoing an extension to their purpose built facility in response to the planned housing developments underway in Beeston. However, the future developments as outlined in the Local Plan Part 2 whilst not significant when considered alone, need to be considered in its entirety together with what is underway and will have significant impact upon the physical capacity of practices to provide health services. There is some potential for small scale developments to assist with this further expansion of the patient population in particular from the Seven Trent and Beeston Square developments.</p> <p>We would ask for a Section 106 contribution to be</p>
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	<p>available to this locality to increase the physical clinical space required to meet the needs of this increase in population over and above that already underway as part of The Oaks Medical Centre expansion.</p>
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<p>Policy: 4.1 Awworth West of Awworth (inside the bypass) 250 homes</p> <p>Policy: 5.1 Brinsley East of Church Lane 110 homes</p>	<p>The nearest facilities to this development and where patients are likely to register are Church St Medical Centre and Church Walk Surgery in Eastwood. See below for details of the Eastwood joint public services proposed development to meet the needs of this increase in population.</p>
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<p>Policy: 6.1</p> <p>Eastwood 200 homes + 30 Extra Care Units Walker Street, Eastwood (Map 24)</p> <p>Land for Medical Centre required in order to make plan effective and therefore sound</p>	<p>A new health centre for Eastwood is the CCG's top priority within its Strategic Estates Plan. The old Eastwood Health Centre was considered no longer fit for purpose and has been recently disposed of resulting in there being no local facilities for extended, community based health services in Eastwood.</p> <p>Both GP practices in Eastwood are in separate facilities which can no longer be extended. They are intending to merge into one practice as of April 2018 to provide GP services to 20,000 local residents.</p> <p>We have been working with Nottinghamshire County Council, the land owners, on the preferred solution which would be a One Public Estate public services hub incorporating a new health facility on the Walker Street site (Map 24). Alongside library services and third sector organisations this new facility would also house the two merged GP practices (Church Street Medical Centre and Church Walk Surgery in Eastwood) plus supporting community health service provision.</p> <p>In order that the plan for Eastwood is effective and therefore sound, part of the Walker Street site must be allocated for a new, purpose built health facility to sit behind the existing library with direct access to the main road with its public transport links ensuring it is easily accessible to the community. A one acre site is required (GIA 2000m2 of two or three storeys dependent upon meeting planning requirements). Direct vehicular access would be required to Walker Street if the site is also identified as the preferred site for a co-</p>
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	located blue light service base. Funding contributions should be sought for this development through Section 106.
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<p>Kimberley (167 homes / 385 residents)</p> <p>Policy: 7.1 Kimberley Depot 105 homes</p> <p>Policy: 7.2 South of Eastwood Road 40 homes</p> <p>Policy: 7.3 Eastwood Road Builders Yard 22 homes</p>	<p>The nearest facility to these developments is Hama Medical Centre, Kimberley. This is a purpose built facility with potential to expand through internal re-organisation of rooms changing their use from clinical to non-clinical physical space.</p> <p>We would ask for a Section 106 contribution to be requested in order to increase the physical clinical space required to meet the demands of the increase in population brought about by the housing developments.</p>
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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

[Redacted signature]

[Redacted name]
[Redacted address]
NHS Nottingham West CCG

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



Your ref:
Date: 3 November 2017

Dear Madam/Sir

Localism Act 2011 – Strategic Planning Comments

Broxtowe Borough Council Local Plan Part 2: Publication Version

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

Officer Comments

Housing

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

Policy 3.1: Chetwynd Barracks

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

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

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

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

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

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

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

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

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

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

Highways

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

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

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

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

Yours faithfully



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

Representations Council on the draft Part Two Broxtowe Local Plan by Ken Mafham Associates on behalf of the Neighbourhood Plan Steering Group Stapleford Town Council

1. Context

Stapleford Town Council is preparing a Neighbourhood Plan. A first draft has been out for informal consultation. The draft is attached. The comments received were generally supportive but a significant number of people have objected to the proposed housing site at Sisley Avenue and Central Avenue and it is possible that these proposals will be deleted when the Town Council considers the results of public consultation.

2. The Neighbourhood Plan

2.1 The Neighbourhood Plan sets out a Green Strategy has been taken as the starting point for considering housing sites. As a consequence there is a disagreement between the draft Neighbourhood Plan and the draft Part 2 Local Plan. In particular the Neighbourhood Plan does not support the allocation for housing of land West of Coventry Lane for housing. The greenbelt status of the site and its proposed designation as a local green space mean that an exceptionally strong justification would have to be provided to over ride the policy objections to non greenbelt uses such as housing.

2.2 The justification for the site West of Coventry Lane is set out on page 36. It is brief. The key passage is

“What the Sustainability Appraisal says

3.12 *As would be expected, as above, this allocation has significant housing and health objectives benefits with only a very minor green objective disbenefit.”*

We take this as a fair summary of the Sustainability Appraisal and its appendices. For the reasons set out below we do not agree that the green disbenefits are very minor. We look forward to debating this matter at the PE at some point in the future. Exceptional circumstances are not mentioned at this point nor, so far as we can see, at any point in the Local Plan. Para 182 of the NPPF says that Local Plans should be **justified**. At para 155 the NPPF says *“Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”*

2.3 The combination of a need to justify and to consult effectively implies a high standard of transparency which this exercise simply does not meet. The “evidence base” set out on page

<https://www.broxtowe.gov.uk/for-you/planning-building/planning-policy/part-2-local-plan/part-2-local-plan-evidence-base/>

Includes a number of documents that are not evidence but policies with some element of justification. We have been involved on the planning process in Broxtowe for some time and to some extent we have been able to trace the threads and we comment on them below but the threads should be drawn together in the Local Plan itself; particularly in the light of a clear obligation to establish exceptional circumstances.

2.4 A key element that we have traced is a report to the Jobs and Economy Committee in January 2017 identified a shortfall in the provision of housing land. We have not seen any more up to date assessment. In our view the technical arguments put forward are incomplete on the grounds

- Consultation with other Districts of greater Nottingham on the whole issue of Core Strategy targets, recent performance and the balance between requirement and supply and another look at the option of reviewing the Core Strategy so as to either change the size of the overall figure for greater Nottingham or revise the way it is distributed bearing in mind there was little explanation of how the distribution was arrived at in the Core Strategy process. The Housing White Paper place a greater emphasis on this kind of collaboration “1.9 *Where an authority has demonstrated that it is unable to meet all of its housing requirement, it must be able to work constructively with neighbouring authorities on how best to address the remainder. The duty to co-operate already places a legal requirement on local planning authorities to collaborate where cross-boundary issues arise during plan-making. However in some parts of the country this has not been successful. To address this we will consult on changes to the National Planning Policy Framework, so that authorities are expected to prepare a Statement of Common Ground, setting out how they will work together to meet housing requirements and other issues that cut across authority boundaries.* “
- Clarification of the five year supply and consideration by Broxtowe BC of commissioning a consultancy study of underperformance in house development.
- Detailed assessment of ways of speeding up the delivery of committed sites
- A review of past patterns of development and of the assumptions that can be justified on windfall sites

2.6 If indeed there is a shortfall then any solution Broxtowe BC comes up with must be within the spatial framework set out in the Core Strategy which identified major areas for development and areas to be retained as greenbelt. A review of the Core Strategy rather than the Part 2 Local Plan is the correct place to rethink the issue of Sustainable Urban Extensions and other sites, such as the proposed allocation West of Coventry Lane, which are simple new housing estate in open land..

2.7. In addition to these very broad strategic points there is the nature of the site itself. There are two main issues; the value of the greenbelt in this location and the sustainability or otherwise of the sites.

3. Greenbelt Issues

3.1 Since the January Report was prepared the Government has published a consultation Paper on Housing that puts great emphasis on the protection of the greenbelt. We note the document is in the evidence base but we see no indication that the report was considered at the July Committee which approved the part 2 Local Plan for public consultation. The White Paper is very clear

Page 21 Summary - LPAs should maintain existing strong protections for the Green Belt, and clarify that Green Belt boundaries should be amended only in exceptional circumstances when local authorities can demonstrate that they have fully examined all other reasonable options for meeting their identified housing requirements;

And again

1.3 In spite of the progress being made to bring more brownfield land back into use, plans don't always encourage a sufficiently wide range of sites to come forward to meet local housing requirements. Often, there is also scope to involve the community earlier in the design of schemes, and to do more with the land which is identified, so homes can be accommodated efficiently. We remain committed to our manifesto promise to protect the Green Belt .

3.2 Para 80 of the NPPF states that the five purposes of the greenbelt are

- to check the unrestricted sprawl of large built-up areas;*
- to prevent neighbouring towns merging into one another;*
- to assist in safeguarding the countryside from encroachment;*
- to preserve the setting and special character of historic towns; and*
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.*

3.3. The green belt to the West of Coventry Lane being considered housing allocation meets three of these objectives. It prevents the sprawl of the main built up area of Broxtowe to the North. It is part of a gap that separates Broxtowe from the built up area of Nottingham. It is also a very valuable part of the countryside used a great deal not only by residents of Stapleford but also from the wider area of Greater Nottingham. We note that the Committee that approved the inclusion of the site also resolved to include a new policy

Policy 30, 'Landscape': Requires developments to be consistent with the guidelines of the Greater Nottingham Landscape Character Assessment

3.4 . The site is not only functionally isolated from built up area separated visually by the attractively landscaped open uses of the crematorium and the restored mineral working North of Bramcote Park.

3.5 . Land to the West of Coventry Lane was not considered when Broxtowe published a report on additional sites in August 2016 and so was presumably not considered a sustainable option at that time. We note in passing that land to the East of Coventry Lane was included and almost two thirds of the comments were not in favour.

4. Sustainability Issues

4.1 The assessment for H123 by Broxtowe BC included in the Stapleford section of the Part Two Local Plan Issues and Options Report 2013 says

May be appropriate to consider it in conjunction with adjacent land (site 108 and 356) as the site in isolation is not well related to existing residential areas.

4.2 . For site 356 the Report says

The site is located within the Green Belt and is not physically attached to any settlement. It is therefore very unlikely to come forward as a housing site in isolation.

However as part of a comprehensive development with land to the West the railway line to the North would form a logical and defensible Green Belt boundary. Technical issues are under investigation

4.3 . The point we will make is that 108 and 356 together will not make a self contained residential area it will simply constitute a large isolated housing area. The area would be totally dependent on services and amenities is aggravated by the fact that there is no public transport to the site and that pedestrian links along Coventry Lane to shops, schools and other amenities to the South are dangerous and unpleasant. The addition of land to the East of Coventry Lane with a capacity of 300 dwellings is unlikely to make an SUE and even if it did Coventry Lane, which is a dangerous road, would bisect the neighbourhood

4.4 . The point in the Broxtowe assessment about the links to areas to the West , presumably Field Farm, so as to form a Sustainable Urban Extension is not only vague but is a policy that should have been debated as part of the Core Strategy. That document proposed an SUE of 450 dwellings at Field Farm. If what is now being considered is an agglomeration of sites with a total capacity of almost 1300 dwellings then what is required is a review of the Core Strategy. This is particularly since it would open the door to proposals on SHLAA site H104 West of Coventry Lane and to the North of the railway. The argument will be made that 1300 dwellings does not have critical mass required of a true SUE. It is disturbing that in the Site Allocations Issues and Options document 2013 the following conclusion from the Tribal Study is quoted without qualification

H2 “North of Stapleford” (including Field Farm, “West of Coventry Lane” and “West of Bilborough Road”) Suitable for development Capacity 3800 to 5700

This possibility should have been assessed at the Core Strategy stage and has no place in the Part Two Local Plan

5. Conclusion

1.The Local Plan document and the process that led up to it is lacking in transparency making effective public consultation impossible to achieve

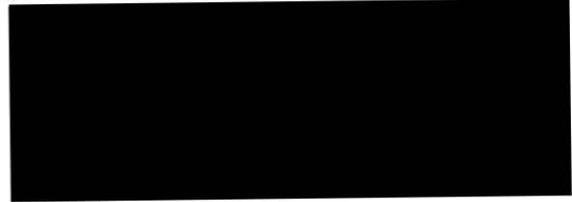
2. Overall the development of sites 108 and 356 for housing would be contrary to the purposes of the greenbelt, would not be self contained and would be unsustainable for that and other reasons. The allocation of the sites would open the way to pressure for further development in the gap between Stapleford and Nottingham / Trowell and would be contrary to the strategic aims of the Nottinghamshire / Derbyshire greenbelt.

3 The draft Neighbourhood Plan has been the subject of an informal but thorough consultation exercise that included sending a copy of a leaflet summarising the Plan to every household in the town. It is an emerging Local Plan as is the Broxtowe Part 2 Local Plan. The Neighbourhood Plan as a whole and the Green Network and Designated Local

Greenspace should be given due weight and the land West of Coventry Lane removed from the Local Plan submitted for Examination.



Stapleford Town Council



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

2nd November 2017

Dear Mr. Saunders,

Broxtowe Local Plan Part 2

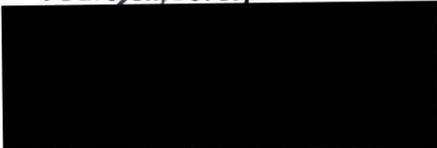
Please find attached the comments regarding the Broxtowe Local Plan Part 2, as discussed by Stapleford Town Council at its Meeting held on 13th October 2017.

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

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

I am also forwarding these comments by email.

Yours sincerely



Town Clerk
Stapleford Town Council

Broxtowe Borough Council
Planning & Community Development

- 3 NOV 2017

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

83/2018 Update: Broxtowe Borough Council Local Plan

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

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

83/2018contd.

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

83/2018contd.

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

83/2018contd.

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

83/2018contd.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

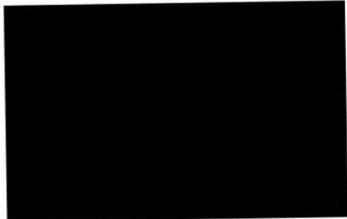
Many thanks

Councillor Richard MacRae
Stapleford North Ward

[Redacted signature]



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3rd November 2017

Broxtowe Labour Group response to the Local Plan Part 2

Dear Steffan

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

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

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

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

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

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

3.2
4
Green transport is also going to offer significant change in Broxtowe over the next ten years as we move towards preparing for the arrival of HS2 in Toton. We welcome HS2 and the opportunities that it will bring for jobs creation and local growth. A significant infrastructure project the size of HS2 offers an opportunity to put Broxtowe on the map, building an economic hub around the Toton Sidings station and the surrounding area. We are therefore strongly in favour of the provision for economic development and transport provision, including a Stapleford Gateway that promotes business growth in the corridor between Toton Sidings and Stapleford. Further, outside of the immediate HS2 area, we are strongly supportive of the development of a freight terminal at Bennerley Washings in order to support jobs and growth in the North of the Borough as well as the South.

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

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

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

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

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

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

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

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

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

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

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

Yours sincerely,

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



Broxtowe Borough Council

Part 2 Local Plan (Publication Version)
Written Representations

On behalf of J McCann & Co (Nottingham) Ltd

November 2017

Quality Control

Project No.	P&DG/13.039			
Title	Part 2 Local Plan (Publication Version)			
Location	Broxtowe Borough Council			
File reference	13.052/Representations			
Issue	Date	Prepared By	Reviewed By	Authorised by
1	2 nd November 2017	AG	BW	BW

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1 Introduction and Executive Summary

- 1.1 This statement of written representations is prepared by Planning and Design Group (UK) Ltd and made on behalf of our client J McCann & Co (Nottingham) Limited in response to Broxtowe Borough Council's consultation on the emerging Part 2 Local Plan (Publication Version).
- 1.2 We welcome the opportunity to respond to this stage of consultation on the Local Plan and recognise the critical importance of establishing an appropriate, legally compliant and sound policy framework for Broxtowe at this point of Local Plan process. As such our comments are structured around relevant policy areas and focus on the soundness and legal compliance of the emerging Local Plan document.
- 1.3 These representations have direct regard to land proposed for allocation to the west of Coventry Lane for up to 240 dwellings through Policy 3.4 Stapleford (west of Coventry Lane) of the emerging Part 2 Local Plan.
- 1.4 We make these representations in the context of seeking to work with the Council both now and in the future to ensure that an effective and deliverable plan for Broxtowe is achieved.
- 1.5 In summary, we find a large number of the proposed modifications sound and warrant our support. Notwithstanding some concern about the wider trajectory of housing land supply, we fully support and welcome the allocation of land to west of Coventry Lane as a sustainable housing site. This allocation will provide enhanced land owner and developer assurance moving forward to deliver the site and in turn boost the housing supply in Stapleford and Broxtowe. This is in the interest of producing a sound and effective Local Plan which delivers on the Spatial Strategy of the adopted 2014 Aligned Core Strategy.
- 1.6 We do hold concern over certain areas of policy wording which relate particularly to the delivery and implementation of housing development. However, we consider that these concerns can be addressed by amends and additions to assure their justification and overall soundness.

2 Policy 2: Site Allocations

- 2.1 In principle Policy 2: Site Allocations is considered **sound** as it directly supports the provision of new homes against the identified need for 6,150 new dwellings in Broxtowe over the life of the Local Plan. The allocation of sites is absolutely critical in the adoption of a plan-led approach in line with paragraph 196 of the National Planning Policy Framework ('NPPF'). This is particularly whereby the designation of land for development through Local Plans provides significantly enhanced land owner and developer confidence in bringing forward sites for development.
- 2.2 As such the Part 2 Local Plan should be seen as a critical tool in supporting market confidence in housing delivery and, in turn, boosting the number of sustainable new homes delivered.

3 Policy 3.4: Main Built up Area Site Allocations, Stapleford (west of Coventry Lane)

- 3.1 The defined Main Built-up Area (MBA), which includes Stapleford and adjoins Nottingham, is designated as a very sustainable location for housing growth in the spatial hierarchy of the Aligned Core Strategy. Therefore, the MBA as a whole is allocated a distributed target to deliver 3,800 dwellings as a part of Broxtowe's overall identified housing need. The prompt delivery of these dwellings will be critical in addressing the overall need for housing in Broxtowe.
- 3.2 The need for all forms of new housing across the country is well documented and is supported in the 2012 National Planning Policy Framework ('NPPF'). It indicates that providing the housing supply to meet the needs of current and future generations is a key aspect of sustainable development and the plan making process.
- 3.3 In light of this housing need across Broxtowe and the MBA the allocation of land to the west of Coventry Lane through Policy 3.4 is considered **sound** as the site will effectively and positively contribute to the delivery of new homes.
- 3.4 We welcome the allocation and identification of the site as a sustainable allocation for the delivery of up to 240 dwellings. The site is positively identified for its ability to provide enhanced Green Infrastructure corridors, improve pedestrian and traffic flows alongside providing a tranquillity buffer between Stapleford Hill and the crematorium.
- 3.5 Policy 3.4 also states that '*this allocation has significant housing and health objective benefits with only a very minor green objective disbenefit*'. Furthermore, the Site Selection Document Main Report (2017) in support of the emerging Part 2 Local Plan identifies that the site as '*one of the most sustainable sites to be allocated when compared to reasonable alternatives*' and notes the sites excellent performance in in the Sustainability Assessment exercise.
- 3.6 We also note that the proposed trajectory of housing supply for the MBA represents, positively, a high proportion of site allocations. This includes land to the west of Coventry Lane. As such less reliance is placed on SHLAA sites which, although reflecting an indicative trajectory of housing supply, do not offer the same level of specificity and

deliverability as site allocations. We refer also in this instance to Table 4: Housing Trajectory on p.75 of the Part 2 Local Plan.

- 3.7 The Part 2 Local Plan is required to act as the delivery tool for Broxtowe's adopted spatial growth strategy and as such site allocations form an essential part of this. In all 14 housing sites are allocated in the MBA area delivering a total of 2,729 dwellings. This reflects an effective and significant 72% contribution to the 3,800 dwellings required across the MBA.
- 3.8 Site allocations act to reduce the level of more speculative development proposals and work in the interests of pursuing a robust, plan-led approach to the housing delivery. In the absence of this approach site delivery is liable of becoming more *ad hoc* in nature, which then presents the risks of ongoing shortfalls in the delivery of new dwellings.
- 3.9 The current deficit in housing land and delivery shortfall across Broxtowe makes this context and need for housing more pressing. This is highlighted in the most recent SHLAA document which states that the Council can only evidence 3.6 years' worth of housing land supply for the period April 2017 and March 2022. In addition, and to be factored into the five-year housing land supply position, is the current delivery shortfall of 956 dwellings, prompting the addition of a 20% buffer. The allocation of land to the west of Coventry Lane will therefore directly support the delivery of housing against this shortfall in turn make a significant contribution to the delivery of a sound Part 2 Local Plan.

4 Policy 15: Housing Size, Mix and Choice

- 4.1 Paragraph 8 of Policy 15 is considered **unsound** as it is unjustified in the current regulatory and evidence context. Specifically, the paragraph states that:

'For developments of more than 20 dwellings, at least 5% of provision should be in the form of serviced plots for self-build or custom-build, and/or custom-build homes by other delivery routes.'

- 4.2 Whilst the associated Self-build and Custom Housebuilding 2016 regulations have brought about requirements on Local Authorities to maintain an active register of interested parties there is no necessity to mandate a certain proportion of self or custom-build plots at a site level. Instead the register should act as a general indicator of demand for subsequent appropriate action or negotiation with relevant interested parties, supported by appropriate Local Plan policy leads.

- 4.3 In relation to this guidance states that:

'Local planning authorities should use the demand data from the registers in their area, supported as necessary by additional data from secondary sources... when preparing their Strategic Housing Market Assessment to understand and consider future need for this type of housing in their area.' (paragraph: 011 reference ID: 57-011-20160401)

- 4.4 Currently the Council display little clarity of understanding behind the 'at least' 5% self and custom-build policy stipulation on sites of over 20 dwellings. For example, neither the latest SHLAA or AMR documents display analysis or conclusions drawn from a publicly available register. This is as per related guidance:

'Relevant authorities are encouraged to publish, in their Authority Monitoring Report, headline data on the demand for self-build and custom housebuilding revealed by their register and other sources. This can support development opportunities for self-build and custom housebuilding by increasing awareness among landowners, builders and developers of the level and nature of demand for self-build and custom housebuilding in the local area.' (paragraph: 012 reference ID: 57-012-201707208)

- 4.5 Given the current lack of evidenced justification and the emphasis on the need to support, not mandate, self and custom-build housing where appropriate the current policy wording should be amended to assure soundness. The change is suggested below:

'For developments of more than 20 dwellings, a provision for serviced self-build or custom-build, and/or custom-build homes by other delivery routes will be supported where evidence indicates local demand to the site.'

5 Policy 17: Place-making, Design and Amenity

- 5.1 Paragraph 3 of Policy 17 is considered **unsound** on the basis that all Building for Life (BfL) material has been withdrawn for planning guidance purposes and therefore stipulated reference to BfL is not a justified. The relevant paragraph states that:

'In the case of major development on sites released from the Green Belt as part of this Local Plan, or the Aligned Core Strategy, or for any site within the Green Belt comprising 10 or more dwellings the development will be required to score 9 or more 'greens' in the Building for Life 12 or equivalent.'

- 5.2 Given the wholly unjustified nature of this paragraph we suggest its entire deletion to assure that Policy 17 is sound. Reference to wider design principles in the policy will still assure a high-quality development across Broxtowe.

6 Policy 32: Developer Contributions

- 6.1 The current nature of Policy 32 is considered **unsound** on the basis it will not be effective in its current form. Whilst the principle of developer financial contributions is entirely sound in delivering the social and environmental infrastructure required by the Local Plan, this should be based on all relevant viability information. We consider that this includes developer viability appraisals which offer a detailed insight into site and development specific viability. Therefore, providing an open position of planning contribution negotiations where appropriate.
- 6.2 Related guidance (paragraph: 004 reference ID: 10-004-20140306) outlines that the grounding principles for understanding viability should include judgements made on all available evidence and a collaborative approach is also promoted, explicitly involving developers and landowners. This is in the interests of understanding development scheme deliverability and viability in an appropriately transparent context.
- 6.3 Guidance also states that whilst viability appraisals at a site level may not always be appropriate an understanding of site specific related viability is important. Outlining that:

'Where the deliverability of the development may be compromised by the scale of planning obligations and other costs, a viability assessment may be necessary. This should be informed by the particular circumstances of the site and proposed development in question. Assessing the viability of a particular site requires more detailed analysis than at plan level.' (paragraph: 016 reference ID: 10-016-20140306).

- 6.4 Therefore, in the interests of promoting a greater understanding of viability and creating a more effective policy we suggest adding reference to the submission of viability appraisals. With wording in an additional paragraph to the effect of:

'Financial contributions will be sought and established through a process of negotiation including, where appropriate, reference to a submitted viability appraisal.'

7 Conclusion

- 7.1 As outlined within this statement we consider that there are areas of the emerging Part 2 Local Plan that contain a number of sound proposals that warrant our support. Particularly in relation to current site allocations in the interests of delivering the defined Spatial Strategy and the specific allocation of land to the west of Coventry Lane through Policy 3.4.
- 7.2 However, we have highlighted where some elements of proposed planning policy are considered unsound and should be amended accordingly through the examination process. This is particularly in relation to policy areas linked the delivery and implementation of housing development. As such their amendment will be important in assuring the rapid adoption of the Part 2 Local Plan and subsequently boosting the supply of much needed housing in Broxtowe.



Planning and Design Group (UK) Limited

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Broxtowe Part 2 Local Plan



Broxtowe
Borough
COUNCIL

Agent

Please provide your client's name	S ROGERS & FAMILY
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Your Details

Title	Mr Mrs Miss Ms Other:
Name	[REDACTED]
Organisation (if responding on behalf of the organisation)	GRACE MARTIN PLANNING & PROPERTY
Address	[REDACTED]
Postcode	[REDACTED]
Tel. Number	[REDACTED]
E-mail address	[REDACTED]

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

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

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

Please tick here

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

For more information including an online response form please visit:

www.broxtowe.gov.uk/part2localplan

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

Please return completed forms to:

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

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

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

Document	Policy number	Page number	Policy text/ Paragraph number
Part 2 Local Plan	Policy 1: Flood Risk		
	Policy 2: Site Allocations		
	Policy 3: Main Built up Area Site Allocations	36 + 37	Policy 3.4
	Policy 4: Awsworth Site Allocation		
	Policy 5: Brinsley Site Allocation		
	Policy 6: Eastwood Site Allocation		
	Policy 7: Kimberley Site Allocations		
	Policy 8: Development in the Green Belt		
	Policy 9: Retention of good quality existing employment sites		
	Policy 10: Town Centre and District Centre Uses		
	Policy 11: The Square, Beeston		
	Policy 12: Edge-of-Centre A1 Retail in Eastwood		
	Policy 13: Proposals for main town centre uses in edge-of-centre and out-of-centre locations		
	Policy 14: Centre of Neighbourhood Importance (Chilwell Road / High Road)		
	Policy 15: Housing size, mix and choice		
	Policy 16: Gypsies and Travellers		
	Policy 17: Place-making, design and amenity		
	Policy 18: Shopfronts, signage and security measures		
	Policy 19: Pollution, Hazardous Substances and Ground Conditions		
	Policy 20: Air Quality		
	Policy 21: Unstable land		
	Policy 22: Minerals		
	Policy 23: Proposals affecting designated and non-designated heritage assets		
	Policy 24: The health impacts of development		
	Policy 25: Culture, Tourism and Sport		
	Policy 26: Travel Plans		
	Policy 27: Local Green Space		
	Policy 28: Green Infrastructure Assets		
	Policy 29: Cemetery Extensions		
	Policy 30: Landscape		
	Policy 31: Biodiversity Assets		
	Policy 32: Developer Contributions		
	Policies Map	MAP 11: STAPLEFORD (WEST OF COVENTRY LANE)	
Sustainability Appraisal			
Other (e.g. omission, evidence document etc.)			

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

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

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

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

Your comments

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

N/A.

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.

NONE - SEE ATTACHED LETTER | REPRESENTATIONS

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

N/A

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

N/A.

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

WE WISH TO SUPPORT POLICY 3.4 STAPLEFORD
(WEST OF COVENTRY LANE) ALONGSIDE
ADJACENT LANDOWNERS.

IT IS IMPORTANT TO SET OUT THAT
THE SITE IS AVAILABLE, SUITABLE AND
DELIVERABLE.

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

Guidance Note:

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

'Legally Compliant':

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

'Compliant with the Duty to Co-operate':

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

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

'Sound'

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

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

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

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

REPRESENTATIONS TO BROXTOWE LOCAL PLAN, PART 2, 2017-2028
– PUBLICATION VERSION, SEPTEMBER 2017

On behalf of S Rogers & Family

PROPOSED RESIDENTIAL ALLOCATION – Policy 3.4 Stapleford
(West of Coventry Lane)

OCTOBER 2017

Prepared By

GRACE | MACHIN
PLANNING & PROPERTY

INTRODUCTION AND SUMMARY

1. We have been instructed to make the following representations in respect of the Broxtowe Local Plan Part 2, Publication Version, September 2017, which is currently being consulted upon, prior to being submitted for Examination in due course. These representations have been prepared having regard to the documents contained within the supporting Evidence Library and have assessed the compliance of the Publication Version Part 2 Local Plan against paragraph 182 of the National Planning Policy Framework (March 2012)(NPPF). Paragraph 182 states that for a plan to be "sound" it should be:
 - * Positively prepared
 - * Justified
 - * Effective
 - * Consistent with national policy
2. These representations seek to support my client's landholding, comprising land at Hulks Farm, West of Coventry Lane, Stapleford, (as identified on the attached Plan) for residential development. This document sets out a brief rationale as to why this Site represents suitable and deliverable land, which should be allocated for residential development, thereby assisting to meet the housing needs of Broxtowe Borough, within a sustainable and accessible location.
3. In order to fully meet the current and future housing needs for the Stapleford Area, (and the wider Borough of Broxtowe), we believe that the Site identified on the attached Plan should be removed from the Green Belt and allocated for residential purposes in addition to other Sites identified for residential allocation, in order to ensure the full delivery of housing requirements for this area.

SITE DESCRIPTION

4. The total site area comprises circa 12.2 hectares, which lies immediately to the west of Coventry Lane and the site has been actively promoted by landowners for residential purposes, for many years.
5. The landholding is incredibly well-related to Stapleford, and we consider that the Site is physically and visually contained and will sit comfortably within a context of new built development to the east and west, whilst not extending into open countryside to the north.
6. Immediately to the south of the Site, lies Bramcote Crematorium. Nearby is a full range of employment, education, leisure, recreational and retail facilities and services, all of which will be easily accessible by public transport or on foot / by bicycle.

PLANNING POLICY CONTEXT

7. The Greater Nottingham, Broxtowe Borough, Gedling Borough and Nottingham City Aligned Core Strategy, Part 1 Local Plan was adopted in September 2014. This strategic plan sets a minimum requirement of 30,550 new homes to be delivered between 2011 and 2028, based upon the following hierarchical approach:
 - a) The main built up area of Nottingham;
 - b) Adjacent to the Sub Regional Centre of Hucknall; and
 - c) Key Settlements identified for growth:
 - i) Awsworth, Brinsley, Eastwood (including parts of Giltbrook and Newthorpe) and Kimberley (including parts of Nuthall and Watnall), in Broxtowe;
 - ii) Bestwood Village, Calverton and Ravenshead, in Gedling.
 - d) In other settlements (not shown on the Key Diagram) development will be for local needs only.
8. Of the total minimum requirement of 30,550 dwellings, at least 6,150 of these are to be located in Broxtowe Borough, of which 3,800 dwellings are to be delivered within or adjoining the main built-up area of Nottingham.
9. The Publication Version Part 2 of the Broxtowe Local Plan now seeks to provide specific site allocations to meet the housing requirement set out within the Core Strategy, Part 1 Local Plan as set out above.

SHLAA 2015/2016

10. The latest SHLAA, produced by Broxtowe Borough Council and dated 2015/2016 identifies that against the requirement of 6,150 dwellings for the period 2011 to 2028, there is a total capacity on urban sites of only 5,631, thereby requiring further sites to be identified outside the urban area.

Publication Draft Part 2 Local Plan: Site Allocations

11. The second part of the plan will include specific site allocations to meet the housing need as set out in the Core Strategy and will detail policies against which planning applications will be assessed. The Publication Draft is now being consulted upon until 3rd November 2017, after which the consultation responses will be taken into account, before the Draft Plan is submitted for formal Examination and subsequently adopted by the Borough Council.
12. **Policy 3** of the Publication Draft Part 2 Local Plan identifies sites in the **Main Built up Area Site Allocations** which are proposed to be allocated for housing. One of the sites proposed for residential allocation includes my clients land within;

- Map 11 : Stapleford (west of Coventry Lane)
13. Site: Stapleford (west of Coventry Lane) has previously been proposed & promoted as a residential allocation and **in partnership with the adjoining land owner we can confirm that we are working together to deliver this site.**
 14. The site is suitable, available and deliverable.

HOUSING LAND SUPPLY

15. A recent appeal decision, Ref: APP/J3015/W/16/3162096, dated the 2nd March 2017 confirms that the Council is currently unable to demonstrate a 5-year supply of housing land. According to the Council's appeal statement, the reported position on the 27th January 2017 was that the LPA could demonstrate a 3.6-year supply of housing land, which is a decline compared to the earlier position on the 1st April 2016, at which time a 4.4 year supply could be demonstrated. In order to ensure and maintain a flexible rolling five year housing land supply position, that is able to adapt to changes in circumstances and the requirements of the market, it is clear that sufficient land must be allocated to accommodate the requisite housing needs of the Borough.

ASSESSMENT OF SOUNDNESS

16. With the above in mind however we do currently believe that the Broxtowe Borough Publication Version Local Plan Part 2 can be considered sound, in relation to site allocations in the Main Built up Area.
17. In order to remain sound, we submit that this land should be allocated for residential development. This site is achievable, suitable and deliverable in the short term, thereby meeting the objectively assessed housing needs of this area of Broxtowe.
18. Specifically, the Council has identified suitable sites within or adjoining Stapleford, sufficient to accommodate the full quantum of housing need in this area.

CONCLUSION

19. Stapleford is a sustainable settlement /area which can accommodate future growth. The allocation of land West of Coventry Lane for a minimum of 240 dwellings is supported.
20. My client's landholding at Hulks Farm in partnership with the land owners to the West will deliver a residential development on land which is immediately adjoining the main built up area of Stapleford and is readily accessible to the range of facilities and services within this settlement, as well as to the public transport network. The Site is suitable, achievable and deliverable in the short term, with no technical constraints or potential delays to bringing this development forward.

21. The Site has been carefully assessed against the reasons for including land within the Green Belt, as set out within the NPPF and it is submitted that the proposed residential allocation of this Site will not result in the unrestricted sprawl of the area or the encroachment of development into the countryside.
22. It is important to consider that within the Broxtowe Borough Council, *Preferred Approach to Site Allocations (Green Belt Review) Consultation February 2015* document it stated within section, Zone 31 : *West of Coventry Lane* (Page 101), the following:
- *“Site is well contained with the allocation of Field Farm to the West, the railway line forming a defensible boundary to the North...”*
 - *“The site includes some existing inappropriate development which have caused some encroachment...”*
23. In order to ensure that the Broxtowe Publication Draft Part 2 Local Plan is considered sound at Examination, we believe that this land / site must be allocated to accommodate the objectively assessed housing needs of this area. For this reason, and based upon my clients willingness to release this land for new homes, we will urge the duly appointed Planning Inspector at future ‘hearing sessions’ to support the Council’s proposed allocation for 240 new homes West of Coventry Lane for residential development.



Broxtowe
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Part 2 Local Plan 2017 - 2028



Publication Version September 2017

Policy: 3.4 Stapleford (west of Coventry Lane)

3.10 Located in the Main Built up Area of Nottingham Stapleford is a town to the east of the M1 motorway, contained largely by the A52 to the south and east. The site is located to the north east of Stapleford District Centre and is situated in-between Stapleford Hill (to the south), the railway line (to the north), Coventry Lane and Bramcote Crematorium to the east and the Strategic Core Strategy allocation of Field Farm to the west. The site is mixed greenfield and brownfield and is used for both equestrian, residential and an engineering depot which has a large existing bell-mouth access onto Coventry Lane.

3.11 The following key development requirements must be met.

Key Development Requirements:

- 240 homes.
- 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.
- Safe pedestrian crossing points provided/enhanced on surrounding roads including links to the redeveloped school and playing pitches on the eastern side of Coventry Lane.
- Incorporate design measures to slow the speed of traffic on Coventry Lane.
- Enhance bus routes adjacent to the site.
- Provide a buffer between the crematorium and Stapleford Hill to ensure tranquil setting of crematorium is not compromised and ensure the new housing will not be in shade for extended periods of time due to the proximity of Stapleford Hill.

Key Development Aspirations;

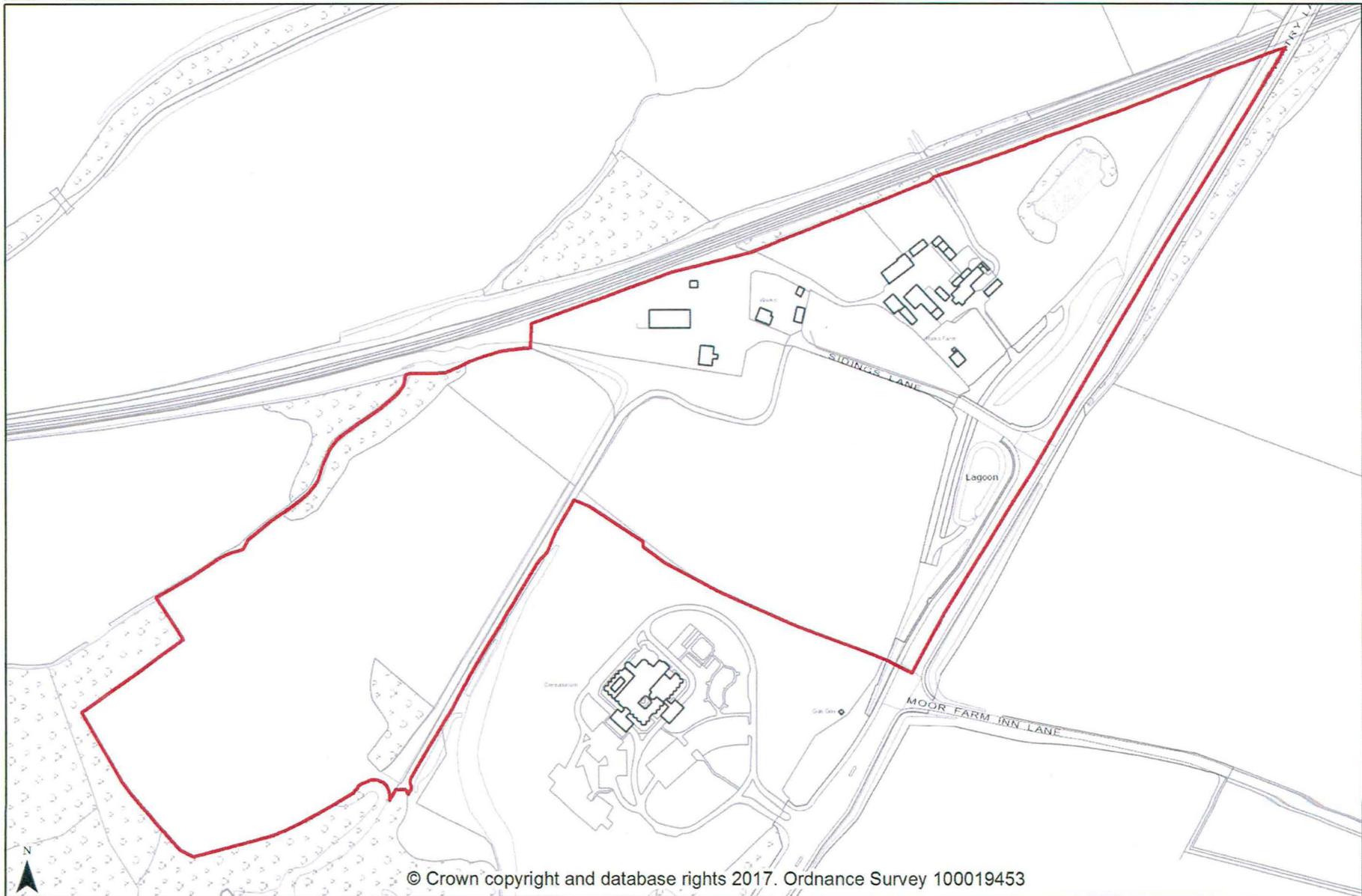
1. Mitigate highways impact on the wider road network to ensure that congestion is not made worse than currently exists.

What the Sustainability Appraisal says

3.12 As would be expected, as above, this allocation has significant housing and health objectives benefits with only a very minor green objective disbenefit.

Map 11: Stapleford (west of Coventry Lane)

Policy: 3.4	240 dwellings	Stapleford	12.2 hectares
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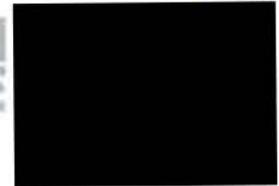
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Planning Policy Team
Broxtowe Borough Council
Foster Avenue
Beeston
Nottingham
NG9 1AB

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

26241/A3/JR/sn/ds

3rd November 2017

Dear Sir/Madam

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

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

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

1. The Soundness of the Plan

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

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



Registered in England
Number: 00262819
Barton Willmore LLP
Registered Office:
The Blade
Abbey Square
Reading
RG1 3BE
T: +44 (0)118 943 0001

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

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

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

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

2. General Comments

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

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

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

3. Site Specific Representations

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

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

<p>Key Development Requirements</p>	<p><u>300 Homes (within the outline shown on page 33)</u></p> <p>Our Client <i>objects</i> against the Council's decision to allocate the Site for 300 units.</p> <p>The Site is 16.6ha in size, rectangular in size, greenfield and has very little constraints. For this reason, the current proposed draft allocation for just 300 units is very low and does not make the most efficient use of land. For a site of this size and nature, 300 units proposes development at a density of just 18 dwellings per hectare, almost half the usual 30dph expected on sites. On this basis our Client strongly objects to the artificial limitation on the site.</p> <p>Having considered technical constraints and masterplanned the Site, as per the attached plan, it is considered that a site capacity of 500 would be more appropriate for this site, which would result in a density of 30dph. The masterplan demonstrates that this can still incorporate access, open space, drainage and links to neighbouring land, together with an appropriate layout.</p> <p>By making more appropriate use of this land it would accommodate a large proportion of the homes required under Policy 3.4 Stapleford (west of Coventry lane) and reduce the impact on the Green Belt by reducing the level of land required to be removed.</p> <p>Stapleford (west of Coventry lane) is an irregular shape that is allocated for 240 units. The change in capacity of Policy: 3.3 Bramcote (East of Coventry Lane) to 500 would uptake 200 of the units proposed at Stapleford (west of Coventry lane).</p> <p><u>Incorporate design measures to slow the speed of traffic on Coventry Lane</u></p> <p>Our Client objects to the wording of this requirement. Coventry Lane is 1.1 miles long and much of the road is out of the control of our Client. Our Client has control of just 0.1 miles of frontage along Coventry Road and therefore it would be appropriate for the wording to be amended to reflect this. The proposed wording of this key Development Requirement is suggested as below:</p> <p><i>"Incorporate design measures to slow the speed of traffic along the frontage of the site fronting on to Coventry Lane where suitably possible."</i></p> <p><u>Provide a replacement school at a location south of the ridgeline, the ridge should be kept free of built development (within the outline shown on page 34)</u></p> <p><u>School redevelopment is to be delivered in conjunction with or prior to housing development (within the outline shown on page 34) and no houses are to be occupied until the school is substantially complete</u></p> <p>Our Client strongly objects to this key development requirement.</p>
--	---

	<p>Our Client has been in discussions with the Council on delivering a replacement school as part of a planning application. However, it should be recognised that previously the site was considered a suitable housing site on its own merits, without regard to the school development being delivered.</p> <p>The Council notes that this site is "<i>One of the most sustainable sites to be allocated when compared to reasonable alternatives.</i>" Moreover, it has no unresolvable issues regarding infrastructure delivery.</p> <p>The site has been demonstrated and agreed by the Council as an appropriate, suitable and sustainable location for residential development. It is not for this development to directly or indirectly be responsible for the provision of a replacement school.</p> <p>Furthermore, the school redevelopment and this site are not mutually dependent upon one another and therefore should not be linked by association through the Key Development Requirements. Our client therefore objects to the requirement of linking the school and the housing.</p> <p>Further to this the policy requires the school to be delivered in conjunction or prior to the housing development. Should the school be linked this requirement is undeliverable as the school requires the funding from the sale of the land. As the funding for the school redevelopment would require the housing to come forward first, this requirement would prejudice the delivery of both. On this basis our client strongly objects to this requirement.</p> <p>It is suggested that both of these Key Development Requirements are removed from the housing allocation in order to ensure the deliverability of the housing site.</p> <p><u>For the reasoning outlined above, our client objects to the soundness of the plan.</u></p>
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4. Green Belt Release

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

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

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

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

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

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

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

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

5. Conclusions and Recommendations

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

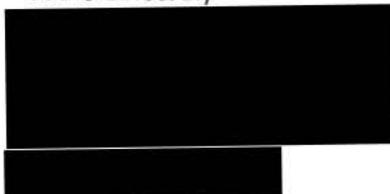
Our Client has a keen interest in the development of the Site and is grateful for this opportunity to engage in the forward planning process. They are committed to ensuring the latest emerging Local Plan is prepared on a sound and robust basis which meets the tests of paragraph 182 of the Framework.

It has been demonstrated throughout the emerging Allocations process that our Client's Site is suitable, available, and achievable and is a deliverable site that should be allocated within the Part 2 of the local Plan. Our Client therefore supports the proposal to allocate the Site for residential development but objects against elements of the Key Development Requirements as outlined in this representation.

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

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

Yours sincerely

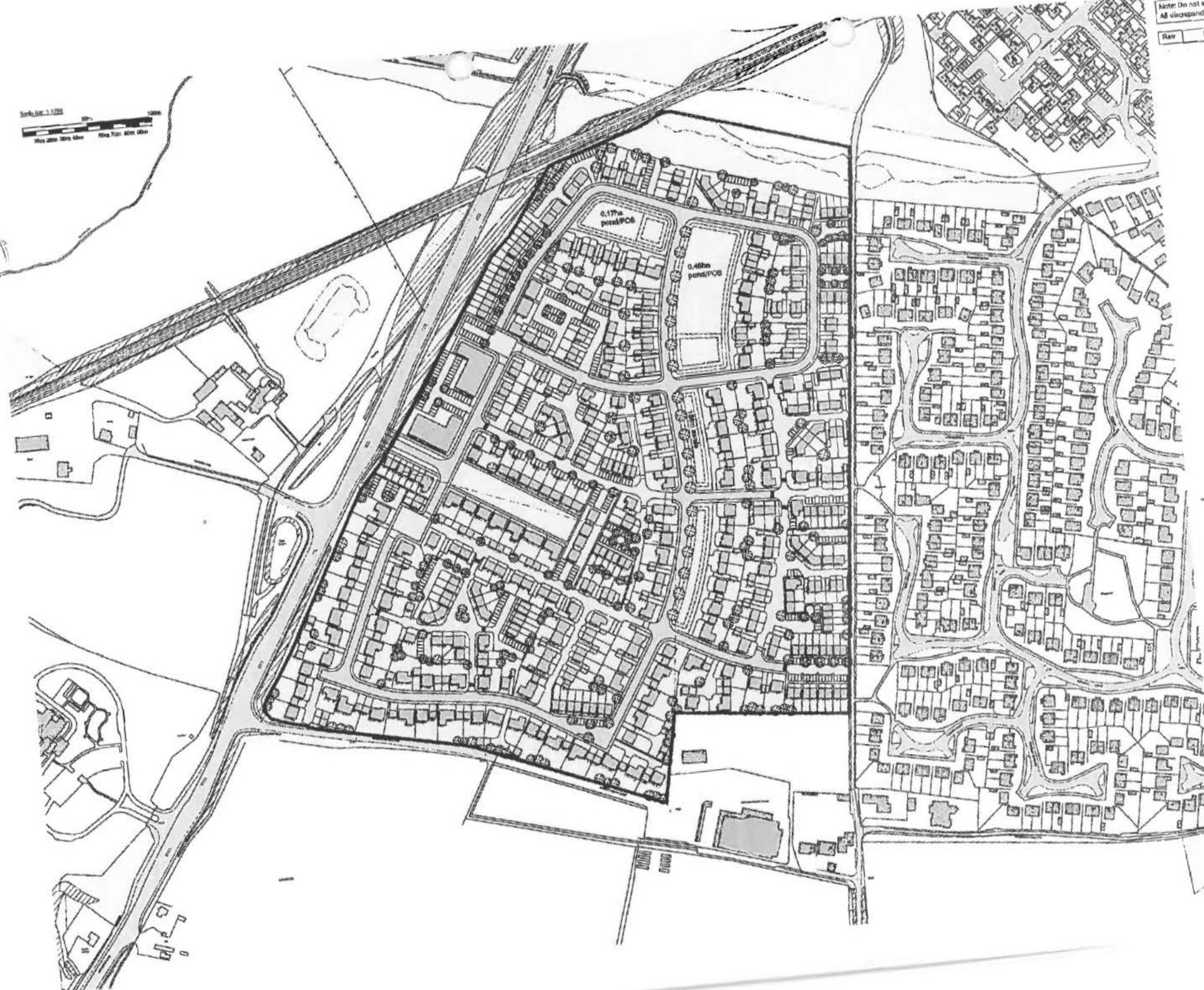
A large black rectangular redaction box covering the signature and name of the Director.

Director

Enc. Plan of the Site

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

Rev	Description	Dr	Date



STATUS: For Discussion

CAD Associates
 ARCHITECTS
 102 & 104 Newland - Lincoln - LN1 7YA
 Tel: (01522) 513800
 Email: enquiries@cadassociates.co.uk
© CAD Associates

CLIENT: White Hills Park Federation Trust

PROJECT: Bramcote Hills Residential Masterplan

TITLE: Site Layout

DRAWN BY: JTC	CHECKED BY:	DATE: April 2017
SCALE: 1:1250 @ A1	PROJECT NUMBER: Bramcote 1736	REV:
DRAWING NUMBER: 4405C/16/SK03		



Broxtowe Part 2 Local Plan



Broxtowe
Borough
COUNCIL

Agent

Please provide your client's name	TAYLOR & BURROWS PROPERTY
-----------------------------------	---------------------------

Your Details

Title	Mr	Mrs	Miss	Ms	Other:
Name	[REDACTED]				
Organisation (if responding on behalf of the organisation)	Phoenix Planning (UK) Limited				
Address	[REDACTED]				
Postcode	[REDACTED]				
Tel. Number	[REDACTED]				
E-mail address	[REDACTED]				

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

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

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

Please tick here

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

For more information including an online response form please visit:

www.broxtowe.gov.uk/part2localplan

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

Please return completed forms to:

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

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

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

Document	Policy number	Page number	Policy text/ Paragraph number
Part 2 Local Plan	Policy 1: Flood Risk		
	Policy 2: Site Allocations		
	Policy 3: Main Built up Area Site Allocations	Page 24 - 46	Policy 3 as a whole
	Policy 4: Awsworth Site Allocation		
	Policy 5: Brinsley Site Allocation		
	Policy 6: Eastwood Site Allocation		
	Policy 7: Kimberley Site Allocations		
	Policy 8: Development in the Green Belt		
	Policy 9: Retention of good quality existing employment sites		
	Policy 10: Town Centre and District Centre Uses		
	Policy 11: The Square, Beeston		
	Policy 12: Edge-of-Centre A1 Retail in Eastwood		
	Policy 13: Proposals for main town centre uses in edge-of-centre and out-of-centre locations		
	Policy 14: Centre of Neighbourhood Importance (Chilwell Road / High Road)		
	Policy 15: Housing size, mix and choice		
	Policy 16: Gypsies and Travellers		
	Policy 17: Place-making, design and amenity		
	Policy 18: Shopfronts, signage and security measures		
	Policy 19: Pollution, Hazardous Substances and Ground Conditions		
	Policy 20: Air Quality		
	Policy 21: Unstable land		
	Policy 22: Minerals		
	Policy 23: Proposals affecting designated and non-designated heritage assets		
	Policy 24: The health impacts of development		
	Policy 25: Culture, Tourism and Sport		
	Policy 26: Travel Plans		
	Policy 27: Local Green Space		
	Policy 28: Green Infrastructure Assets		
	Policy 29: Cemetery Extensions		
	Policy 30: Landscape		
	Policy 31: Biodiversity Assets		
	Policy 32: Developer Contributions		
Policies Map			
Sustainability Appraisal			
Other (e.g. omission, evidence document etc.)			

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

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

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

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

Your comments

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

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

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

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

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

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

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

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

It is clear from viewing the Local Plan Publications Version and the accompanying Site Selection Document that the justification for release more housing within the main urban area than within Eastwood is that the areas such as Toton, Bramcote and parts of Stapleford are higher marketing areas and accordingly will enable the LPA to secure more S106 benefits. Objection is raised to this approach as the S106 provisions secured will benefit the already affluent and well provided for areas of Bramcote and Toton. By failing to release more land within Eastwood, leads to a reduction in the ability to secure funding for the more deprived settlement of Eastwood and build capacity for this area.

There are also a number of sites included within the housing land supply calculation as identified by the SHLAA. Our comments on these are as follows:

<i>SITE</i>	<i>NUMBER OF DWELLING</i>	<i>ISSUES</i>
Works, Bailey Street, Stapleford	15 dwellings	<ul style="list-style-type: none"> - Outline consent approved in 2012 which has now lapsed and has not been renewed. No certainty that this site will come forward for development. - Contamination issues and adjacent existing uses may impact upon the marketability of this site and therefore question is raised with regards to its deliverability. - Site should be removed from housing supply
Wadsworth Road, Stapleford	11 dwellings	<ul style="list-style-type: none"> - School site is now occupied by the Haven Group and unlikely to come forward for housing for several years, if at all. This site should be removed from the SHLAA as the site is not deliverable.

It is clear that there are significant issues with a number of the sites both within the allocations and within the SHLAA that may affect deliverability within the plan period. In this regards, it is considered necessary to release additional land within the Borough in order to ensure that the housing requirement is met in full.

As this and other objections will show, there is considerable concern that the policies reflect the situation as the Council would like to see it viewed in terms of site delivery, rather than as it will be. Therefore, the Plan fails the tests of soundness as:

- 1. Positively Prepared:** To meet the test the plan must be able to show it is based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, in a manner consistent with achieving sustainable development. The sites selected, and the many previously permitted, do not show a positive approach to achieve the delivery claimed within the next 5 years let alone the immense step change that the Trajectory in Table 4 is suggesting will occur. The Council appear to be relying on sites that have failed in the past which indicates that the Plan is not positively prepared.
- 2. Justified:** The sites highlighted above are not fully evaluated and the belief that they will deliver in the manner suggested is not justified.
- 3. Effective:** The fact that the issues raised above, that sites will not deliver as forecast, means that the Plan will fail to be effective and deliver the growth required.
- 4. Consistent with national policy:** The NPPF (Para 14) requires local planning authorities should positively seek opportunities to meet the development needs of their area. It goes on to seek to “boost significantly the supply of housing” (para 47) . However, as this and other objections will show, that is not the approach the council is talking, relying instead on sites where deliverability is questionable.

Question 4: Modifications sought

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

The council should take a fresh look at potential new sites where deliverability has not already failed and consider sites that do not have the deliverability and viability issues that some of the current sites face.

It is considered that additional housing should be released within Eastwood in order to provide a plan that is more in compliance with the Adopted Core Strategy and to ensure that sufficient developable and deliverable sites are allocated to meet the full housing needs for the plan period. It should focus on the more marketable areas of Eastwood and support this areas growth and regeneration in a more positive fashion.

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

Question 5: Public Examination Attendance

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

Yes, I wish to participate at the public examination

✓

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

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

There are issues of how far the Plan still aligns with the Core strategy that it claims to rely on, although it's approach appears at odds with that document.

The growth and regeneration of Eastwood is a matter which would benefit from a roundtable debate on the merits of various sites and alternatives.

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

Policy 3 24-25/27

Broxtowe Part 2 Local Plan



Broxtowe
Borough
COUNCIL

Agent

Please provide your client's name /

Your Details

Title	Mr <input checked="" type="checkbox"/> Mrs <input checked="" type="checkbox"/> Miss <input checked="" type="checkbox"/> Ms <input checked="" type="checkbox"/> Other: <input type="checkbox"/>
Name	DAVID PEARSON
Organisation <small>(If responding on behalf of the organisation)</small>	
Address	<div style="background-color: black; width: 100%; height: 40px;"></div>
Postcode	<div style="background-color: black; width: 100%; height: 20px;"></div>
Tel. Number	<div style="background-color: black; width: 100%; height: 20px;"></div>
E-mail address	<div style="background-color: black; width: 100%; height: 20px;"></div>

Broxtowe Borough Council
 Planning & Community Development

 - 3 NOV 2017

Comments should be received by 5.00pm on Friday 3rd November 2017
 If you wish to comment on several policies, paragraphs, or sites, please use a separate form for each representation.

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

Please help us save money and the cost of your [REDACTED] correspondence can be sent to: [REDACTED]

For more information including an online response form please visit:
www.broxtowe.gov.uk/part2localplan

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

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

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

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

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

Your comments

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

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

Question 4: Modifications sought

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

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

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

Question 5: Public Examination Attendance

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

Yes, I wish to participate at the public examination



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

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

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

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

Details

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

Policy relates to

Please specify what your comment relates to					
Policy number	Page number	Policy text/ Paragraph number	Policies Map	Sustainability Appraisal	Other (e.g. omission, evidence document etc.)
8: Development in the Green Belt	85				

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

Question 2

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

Question 3

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

Additional details

<p>Please give details of why you consider this part of the Local Plan is not legally compliant, is unsound or does not comply with the duty to co-operate. Alternatively, if you wish to support any of these aspects please provide details.</p>	<p>Green Belt land has some degree of legal protection, which seems to be totally ignored in the plan. The proposed developments on either side of Coventry Lane ignore the fact that this road is already over congested and to add hundreds more homes without improving road infrastructure will cause chaos. What co-operation has Broxtowe Borough Council tried to develop with Bramcote Neighbourhood Forum, which totally rejects the principle of development on Green Belt land?</p>
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Question 4

<p>Question 4: Modifications sought</p>	
<p>Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this modification will make the Local Plan legally compliant or sound.</p>	<p>Find other areas within Broxtowe Borough that can be developed without encroaching on the Green Belt, e.g. industrial or retail sites that are no longer needed. This will avoid destruction of the Green Belt and make use of areas that already have a better road infrastructure.</p>

Question 5

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

Details

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

Policy relates to

Please specify what your comment relates to					
Policy number	Page number	Policy text/ Paragraph number	Policies Map	Sustainability Appraisal	Other (e.g. omission, evidence document etc.)
3: Main Built up Area Site Allocations	32	3.3	8 and 10		Sound

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

Question 2

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

Question 3

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

Additional details

<p>Please give details of why you consider this part of the Local Plan is not legally compliant, is unsound or does not comply with the duty to co-operate. Alternatively, if you wish to support any of these aspects please provide details.</p>	<p>This is precious green belt land and should be kept for future generations to enjoy. Bramcote is presently a much built up area and has already joined onto parts of Wollaton and Stapleford and so the Community identities and the 'green corridor' have already been eroded. Our understanding was that one of the aims of green belt land was to prevent 'urban sprawl'.</p> <p>We understand that there is a need for more housing generally but if the proposed housing development goes ahead with some 350 dwellings on the Coventry Lane land, Bramcote is being asked to take more than its fair share. It has already contributed 140 houses at the St John's College site and the proposed Golf Course development let alone other smaller developments. Surely this is sufficient for a small community such as Bramcote? Indeed a recent independent survey said that of the plan for 6000 houses in the Broxtowe Borough, Bramcotes share of this should be in the region of 180 houses. It should also be considered that circa 300 homes are planned for the western side of Coventry lane, this would mean that existing extensive greenbelt on both sides of Coventry lane (east and west) would be replaced with over 600 new homes, which is far too excessive. Certainly for the road infrastructure and wellbeing of the Coventry Lane area. Coventry Lane is already a very busy road for its size and it is one of the main arteries from this side of the City to the M1 and the north of the County. It does not bear thinking about the amount of traffic another 600 homes would create. The other issue is health care and the impact all of these new homes would have on the existing health care.</p> <p>Once the green belt has gone its gone, and we should do all we can to keep it.</p>
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Question 4

<p>Question 4: Modifications sought</p>	
<p>Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this modification will make the Local Plan legally compliant or sound.</p>	<p>The green belt to remain intact, with no planning consent to be given for development.</p>

Question 5

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

[REDACTED]

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

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

Dear Mr. Saunders

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

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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

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

Green Belt: -

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

Housing: -

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

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

Transport: -

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

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

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

Education

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

Steffan Saunders
Broxtowe Borough Council
Foster Avenue
Beeston



3 November 2017

Dear Steffan

Broxtowe Core Strategy – Part 2

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Yours sincerely

[Redacted signature block]

[REDACTED]

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

For the attention of Mr David Lawson

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

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

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

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

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

Thanking you.

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

Details

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

Policy relates to

Please specify what your comment relates to					
Policy number	Page number	Policy text/ Paragraph number	Policies Map	Sustainability Appraisal	Other (e.g. omission, evidence document etc.)
20: Air Quality	119				

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

Question 2

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

Question 3

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

Additional details

<p>Please give details of why you consider this part of the Local Plan is not legally compliant, is unsound or does not comply with the duty to co-operate. Alternatively, if you wish to support any of these aspects please provide details.</p>	<p>Air Quality is a known issue in Broxtowe. Significant additional housing is proposed east and west of Coventry Land and at Field Farm. Redevelopment of the school will increase secondary and probably (in future) primary school children numbers. Additional traffic on Coventry Land, A52 and, in particular along Moor Lane for school drop off will worsen air quality. In the case of Moor Lane, vulnerable children walking to school will be affected as well as residents</p>
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Question 4

<p>Question 4: Modifications sought</p>	
<p>Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this modification will make the Local Plan legally compliant or sound.</p>	<p>The plan needs to include measures to reduce the schools traffic to Moor Lane, including measures to discourage cars and measures to spreading the areas where children in cars are dropped off. One option is to plan the spine road in any new development east of Coventry Lane to include a drop off zone close to the pedestrian access to the schools</p>

Question 5

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

To: Planning Policy Team
Broxtowe Borough Council



2nd November 2017

Broxtowe Local Plan Part 2 - Bramcote Area.

Dear Planners,

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

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

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

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

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

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

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

Yours faithfully,



L. D. HILL (MRS)



Broxtowe Borough Council
Planning & Community Development
- 3 NOV 2017

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To: Planning Policy Team,
Broxtowe Borough Council.



2 November, 2017

Consultation on Broxtowe Local Plan Part 2 - Bramcote Area.

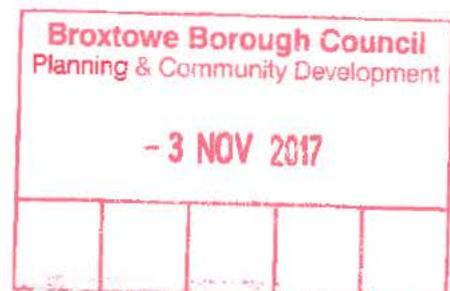
Dear Sirs,

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

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

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

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



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

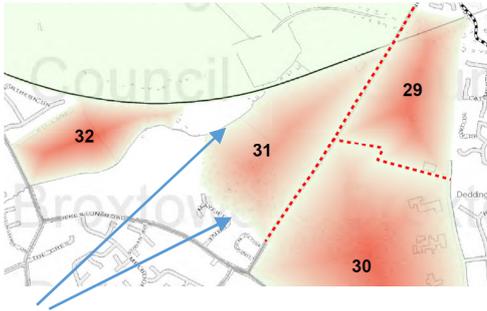
Nothing in the document is stated about these influences or a solution offered. They have been apparently glossed over. Feasible solutions surely must be fundamental to any plan otherwise it is simply not viable. I am now retired from industry but was involved in project management where a significant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

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

Yours faithfully



Maurice Hill

Purpose/Impact	Score/ Assessment	Photos
<p>Check the unrestricted sprawl of settlements</p>	<p>**The site has two boundaries with a settlement (taking into account the recent Green Belt amendment at Field Farm).</p> <p>Coventry Lane could be used as a defensible boundary. The site is currently visually disconnected from any settlement, albeit it is connected to the Field Farm allocation.</p> <p>Site is well contained with the allocation of Field Farm to the West, the railway line forming a defensible boundary to the North, Stapleford Hill to the Southwest, and A6002 to the East.</p> <p>**** The site has ONE boundary as no building will take place on Stapleford Hill woodland. Without the field farm site which has not yet been built, it has NO boundaries. Additionally if this site adjoins the field farm site it would completely cut off a secondary wildlife corridor Identified in the green infrastructure strategy.</p> <p>Coventry lane is not a defensible boundary if sites 29 and 30 are also to be built on.</p>	 <p>View from Stapleford Hill looking towards the McCann depot to the North East.</p>  <p>The ONE boundary with settlement. Stapleford Hill which will not be built on</p>  <p>The two existing settlement boundaries suggested by the map</p>

<p>Prevent neighbouring settlements from merging into one another</p>	<p>*** Development would result in a moderate reduction in the size of the gap between Bramcote and Stapleford.</p>	 <p>View from Sidings Lane looking west.</p>
<p>Assist in safeguarding the countryside from encroachment</p>	<p>** The site includes some existing inappropriate developments which have caused some encroachment e.g. the Crematorium and the industrial units.</p> <p>*** The Crematorium is intentionally set in a location of peace and tranquillity. Additionally cemeteries and graveyards are included as green infrastructure and the landscaped gardens of the crematorium have equal merit.</p> <p>The buildings pictured are former farm houses and buildings which are to be expected in greenbelt.</p> <p>The industrial units are screened by a line of trees and are not visible from Coventry lane or the viewpoint at the top of Stapleford Hill</p>	 <p>View from Sidings Lane looking north.</p>

<p>Preserve the setting and special character of historic settlements</p>	<p>** The site could have a less than moderate adverse impact on heritage assets associated with settlements i.e. there could be an impact on the Hemlock Stone unlisted heritage asset.</p> <p>*** This site is not only adjacent to the iconic hemlock stone site it is also clearly visible from the Robin Hoods way long distance footpath.</p>	
<p>Assist in urban regeneration</p>	<p>It is considered that all sites in the Green Belt assist in urban regeneration. This is not considered to be a matter of difference between Green Belt sites and therefore this Green Belt purpose is not scored as part of the Framework.</p>	

Figure 2: Assessment Matrix

The Matrix provides a grading system for the assessment of sites and will be used at both assessment stages. Higher scoring sites are generally the most important in Green Belt terms. (NB. The term 'site' is used for consistency and includes broad locations)

Purpose / Impact	★	★★	★★★	★★★★	★★★★★
Check the unrestricted sprawl of settlements	The site has two or more boundaries adjoining a settlement or rounds off an existing settlement. The site is well contained by strong physical features which can act as defensible boundaries and does not extend over topographical features.		The site has two or more boundaries adjoining a settlement but is not well contained and there are weak or no features to act as defensible boundaries.		The site does not adjoin a settlement, or has only one boundary with a settlement, or forms a long limb into open countryside. There are weak or no features to act as defensible boundaries. The site is visually disconnected from any settlement.
Prevent neighbouring settlements from merging into one another	Development would not reduce the size of the gap between settlements, or would result in only very limited reduction.		Development would result in a moderate reduction in the size of a gap between settlements.		Development would result in a complete or virtually complete merging of settlements.
Assist in safeguarding the countryside from encroachment	The site includes a large amount of existing inappropriate developments which have caused a significant degree of encroachment.		The site includes some existing inappropriate developments which have caused some encroachment.		The site does not have any inappropriate developments and therefore no encroachment.
Preserve the setting and special character of historic settlements	The site will have no adverse impact on one or more conservation areas or designated or non-designated heritage assets associated with settlements.		The site will have a moderate adverse impact on one or more conservation areas or designated or non-designated heritage assets associated with settlements.		The site will have a significant adverse impact on one or more conservation areas or designated or non-designated heritage assets associated with settlements.
Assist in urban regeneration	It is considered that all sites in the Green Belt assist in urban regeneration. This is not considered to be a matter of difference between Green Belt sites and therefore this Green Belt purpose is not scored as part of the Framework.				

Broxtowe Borough Council Green Belt Review 2015

Main Built up Area Assessment Summary:

Area	Parish	Scores for Purpose/ Impact				Total
		Check the unrestricted sprawl of settlements	Prevent neighbouring settlements from merging into one another	Assist in safeguarding the countryside from encroachment	Preserve the setting and special character of historic settlements	
Zone 22: West of Hucknall	Greasley	3	3	3	1	10
Zone 23: Area between Long Lane and dismantled railway line adjacent to Blenheim Industrial Estate	Greasley & Nuthall	3	5	3	1	12
Zone 24: Area between Nottingham Road Nuthall and Long Lane	Nuthall	3	4	3	1	11
Zone 25: Land Between Nottingham Business Park and Nottingham Road Nuthall	Nuthall	2	4	3	2	11
Zone 26: Land in the vicinity of Strelley Village	N/A	4	3	3	3	13
Zone 27: Trowell Moor (between Strelley and Nottingham Road)	Trowell	3	3	3	3	12
Zone 28: Land between Nottingham Road & Railway Line	Trowell	3	4	3	3	13
Zone 29: North of Bramcote Ridge/Moor Farm Lane up to Railway	N/A	2	4	5	1	12
Zone 30: Bramcote Ridge/Hills	N/A	2	4	1	2	9
Zone 31: West of Coventry Lane	Stapleford	2	3	2	2	9
Zone 32: Northwest of Field Farm (A609)	Trowell	1	1	5	1	8
Zone 33: Between Moorbridge Lane & M1	Trowell & Stapleford	3	4	3	2	12
Zone 34: Between Thorpe Close and Moorbridge Lane	Stapleford	3	3	3	2	11
Zone 35: West Stapleford (South)	Stapleford	3	4	2	2	11
Zone 36: Hill Top Farm	Stapleford	2	2	4	4	12
Zone 37: North of Common Lane Bramcote	N/A	3	4	2	5	14
Zone 38: Land East of the A52 North of Wheatgrass Farm / South of Common Lane	N/A	3	4	4	4	15
Zone 39: East of Toton Lane – North of the Tram Line	N/A	3	4	3	1	11
Zone 40: East of Toton Lane - South of the Tram Line/ Park & Ride	N/A	1	3	2	1	7
Zone 41: West of Toton Lane	N/A	1	4	1	2	8
Zone 42: Toton Sidings	N/A	2	4	1	2	9
Zone 43: Attenborough Nature Reserve	N/A	3	4	4	4	15
Zone 44: Adjacent Chilwell Retail Park	N/A	1	1	5	1	8
Zone 45: South of Beeston Rylands	N/A	3	4	3	4	14

Options to the West of the Built up area of Nottingham (Site H2) and to the West of Toton Lane and Toton Sidings (Sites G2 and G3) were previously considered as potential directions for growth

Details

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

Policy relates to

Please specify what your comment relates to					
Policy number	Page number	Policy text/ Paragraph number	Policies Map	Sustainability Appraisal	Other (e.g. omission, evidence document etc.)
3: Main Built up Area Site Allocations	36	3.12	11		greenbelt assessment 2015

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

Question 2

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

Question 3

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

Additional details

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.

I disagree that this development will only cause "a very minor green objective disbenefit"

Firstly the assessment of the green belt carried out in Broxtowe Borough Councils Green belt review 2015 does not reflect an accurate description of the site. Using the assessment matrix from figure 2 on page 8 the site was assessed as follows.

Check the unrestricted sprawl of settlements:

Original assessment reads

****The site has two boundaries with a settlement (taking into account the recent Green Belt amendment at Field Farm). Coventry Lane could be used as a defensible boundary. The site is currently visually disconnected from any settlement, albeit it is connected to the Field Farm allocation. Site is well contained with the allocation of Field Farm to the West, the railway line forming a defensible boundary to the North, Stapleford Hill to the Southwest, and A6002 to the East."

I disagree with this assessment for the following reasons

**** The site has ONE boundary as no building will take place on Stapleford Hill woodland and will remain visually disconnected. Without the field farm site which has not yet been built, it has NO boundaries. Coventry lane is not a defensible boundary if sites 29 and 30 (land to the east of Coventry lane) are also to be built on. Prevent neighbouring settlements from merging into one another

Original assessment reads

*** Development would result in a moderate reduction in the size of the gap between Bramcote and Stapleford.

I agree with this statement if the sites 29 and 30 (land to the east of Coventry lane) are not to be built on.

Assist in safeguarding the countryside from encroachment

Original assessment reads

**** The site includes some existing inappropriate developments which have caused some encroachment e.g. the Crematorium and the industrial units."

I disagree with this assessment for the following reasons

*** Cemeteries and Churchyards are included as green infrastructure in Broxtowe's Green infrastructure strategy document, the landscaped gardens of the crematorium have equal merit.

The buildings pictured in the assessment are former farm houses and out buildings which are to be expected in greenbelt.

The industrial units are screened by a line of trees and are not visible from Coventry lane or the viewpoint at the top of Stapleford Hill

Preserve the setting and special character of historic settlements

Original assessment reads

**** The site could have a less than moderate adverse impact on heritage assets associated with settlements i.e. there could be an impact on the Hemlock Stone unlisted heritage asset."

I disagree with this assessment for the following reasons

*** This site is not only adjacent to the iconic hemlock stone site it is also clearly visible from the Robin Hoods way long distance footpath.

The original assessment for this site gives a score of nine. The actual value of the site is 13.

	<p>Secondly this matrix does not include the value of the ecology of the site. . The site has important mature woodland, grassland, hedgerow and freshwater habitats (in the form of Boundary Brook) in close proximity. The combined development of this site and the current suggested plans for the Fields Farm site will totally close off two secondary wildlife corridors identified in Broxtowe's green infrastructure policy document, having a negative ecological impact beyond the borough.</p> <p>I am e-mailing a document containing images to support this.</p>
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Question 4

Question 4: Modifications sought	
<p>Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this modification will make the Local Plan legally compliant or sound.</p>	<p>This site should not be considered for development, A buffer zone would be needed around each of these features to protect the biodiversity as this is a main objective of a sustainable urban extension. Natural England suggest a minimum of 30m for wildlife corridors. In light of the ecological importance of the site and no prior construction restricting this requirement, a minimum 50m corridor would be more suitable. These requirements will ultimately lead to the site being an isolated development which does not make it viable.</p>

Question 5

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