

Policy 3.5 – Severn Trent (Lilac Grove):

ID	Organisation
Duty to Co-operate / Interest Groups	
34	Nottinghamshire Wildlife Trust
48	Sport England
55	Pedals (Nottinghamshire Cycling Campaign)
211	Nottinghamshire County Council
1460	Beeston and District Civic Society
6276	Nottingham West Clinical Commissioning Group
6432, 6816, 6817, 6818, 6819, 6820, 6822, 6825, 6843, 6875, 6906, 6975	Beeston Wildlife Group
6882	Broxtowe Labour Group
Developer / Landowner	
2542	Mrs Viitanen (Represented by Featherstones)
4622	Mrs Barnes (Represented by Featherstones)
6881	Mrs Taylor (Represented by Featherstones)
2652	W Westerman (Represented by Oxalis Planning Ltd)
2685	Bloor Homes Ltd (Represented by Oxalis Planning Ltd)
4200	Taylor & Burrows Property (Represented by Phoenix Planning (UK) Ltd)
Individual / Local Resident	
6958	Ziotowitz
6959	McCourtney
6955	Gillies
3349	Harris
6960	Groves
6962	Shaw
6961	Goodinson
6953	Gibberd
6952	Mansell
6954	Carney
6956	Deube
6957	Zipser
6951	Souter
1365	Dyer
2413	Zlotowitz
3637	Wright
6806	Wagner
6812	Wood & Hernandez
6813	Crossland
6814	Orgill
6815	Clarke
6823	Douglas
6824	Huskisson
6840	Booth

6846	Cox
6847	Hannah
6848	Roodbaraky
6855	McCormack
6900	Gorman
6913	Wright

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

3rd November 2017

Dear Sir/ Madam

Comments on Publication Version Part 2 Broxtowe Local Plan

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

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

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

Our comments on individual policies are set out below:

Policy 3 Main built up area site allocations

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

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

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

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



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Modification sought

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

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

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

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

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

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

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

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

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

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

Modification sought

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

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

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

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

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

Modification sought

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

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

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

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

Modification sought

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



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

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

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

Modification sought

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

Policy: 3.6 Beeston Maltings: 56 Homes

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

Modification sought

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

Policy: 3.7 Beeston Cement Depot: 21 Homes

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

Modification sought

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

Policy 4 Awsworth Site Allocation

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

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

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

Modification sought

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

Policy 5 Brinsley Site Allocation

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

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

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

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

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

Modification sought

Replace this site allocation with ‘option 2’.

Policy 6 Eastwood Site Allocation

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

Modification sought

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



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Policy 7.1 Land south of Kimberley Depot

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

Modification sought

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

Policy 7.2 Land south of Eastwood Road Kimberley

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

Modification sought

Site to be excluded.

Policy 17 Place-making, Design and Amenity

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

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

Modification sought

Under n) adding reference to following:

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

Under p) adding a reference to insect houses.

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

Policy 19 Pollution, Hazardous Substances and Ground Conditions

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

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

Policy 27 Local Green Space

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

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

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

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

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

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

References

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



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

Modification sought

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

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

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

Policy 28 Green Infrastructure Assets

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

Policy 29: Cemetery extensions

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

Policy 31: Biodiversity Assets

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

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

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

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

Modification sought

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

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

Policy 32: Developer Contributions

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

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

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

Yours sincerely

[Redacted]
[Redacted]
Nottinghamshire Wildlife Trust



**Nottinghamshire
Wildlife Trust**

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Details

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

Policy relates to

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

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

Question 2

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

Question 3

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

Additional details

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

Consistency with National Policy

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

Justification of the Plan - Policy Specific Considerations

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

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

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

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

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

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

Map 3 - this map includes the site allocation of Trent Vale sports club within the mixed-use commitments however the plan gives no further information on this allocation. Details of the allocation should be provided to ensure the facilities are retained as playing fields and upgraded to sufficient standards as detailed within the Playing Pitch Strategy.

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

	<p>should require the facilities to be protected or replaced. The loss of the playing fields without an agreed compensatory project being implemented would not accord with Sport England's playing fields policy or paragraph 74 of the NPPF.</p> <p>Policies 17 & 24 - Sport England supports the idea of health impact to be a design consideration for new communities and would encourage the inclusion of a design policy which encourages developments to be designed to promote active lifestyles through sport and physical activity (through use of Sport England's and Public Health England's established Active Design guidance (http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design/))</p> <p>Policy 25 – Sport England seeks to ensure that a planned approach to the provision of facilities and opportunities for sport and recreation is taken by planning authorities. We are pleased that it is the council's intention to ensure policies provide adequate sport and recreation facilities as part of new developments. However, the level of provision should be determined locally and should be informed by the Playing Pitch Strategy and Green Infrastructure Strategy.</p> <p>Policy 27 - Sport England is encouraged that the emerging local plan looks to include policies to protect existing sport/leisure facilities where there is a need to do so to meet existing/future community needs which accord with paragraph 74 of the NPPF - policies that support the principle of enhancing existing sports/leisure facilities to meet community needs. However, it is thought that the plan should also include policies and to provide new sports/leisure facilities that are required to meet identified needs e.g. site allocations for new playing fields, requirements in major housing and mixed-use developments for sport/leisure provision, sports hubs allocations etc</p> <p>Policy 28 – Sport England welcomes the inclusion of policies which ensure adequate provision for new development (especially residential) to provide for the additional sport/leisure facility needs that they generate through CIL and/or planning obligations.</p> <p>If you would like any further information or advice please contact me.</p>
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Question 4

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

Question 5

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

Broxtowe Part 2 Local Plan



Broxtowe
Borough
COUNCIL

Agent

Please provide your client's name	n/a
-----------------------------------	-----

Your Details

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

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

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

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

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

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

www.broxtowe.gov.uk/part2localplan

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

Please return completed forms to:

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

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

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

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

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

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

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

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

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

Your comments

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

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

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

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

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

Policy: 3.3 Bramcote (East of Coventry Lane)

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

Question 4: Modifications sought

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

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

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

Policy: 3.3 Bramcote (East of Coventry Lane)

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

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

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Question 5: Public Examination Attendance

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

Yes, I wish to participate at the public examination

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

/

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

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.

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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:

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- '**Consistent with National Policy**': Do you consider that our Local Plan accords with the National Planning Policy Framework (NPPF) and other policies, or includes clear and convincing reasons for doing something different?

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

Details

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

Policy relates to

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

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

Question 2

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

Additional details

Please give details of why you consider this part of the Local Plan is not legally compliant, is unsound or does not comply with the duty to co-operate. Alternatively, if you wish to support any of these aspects please provide details.	<p>Policy 4.1 section 4.5 of the P2LP explains that access to the site is expected from Awsworth Bypass yet this is only to be considered as a last resort and wouldn't be favoured by the highway authority. The IDP on page 75 explains the highway authorities position. This appears inconsistent with the policy in the P2LP.</p> <p>NCC would be very grateful for your thoughts on the apparent discrepancies and inconsistencies between the two consultation documents.</p>
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Question 5

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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 Part 2 Local Plan



Broxtowe
Borough
COUNCIL

Agent

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

Your Details

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

Broxtowe Borough Council
Planning & Community Development

- 3 NOV 2017

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

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

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

Please tick here



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

For more information including an online response form please visit:

www.broxtowe.gov.uk/part2localplan

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

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It is not effective	<input type="checkbox"/>
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including the field in the Rylands at the end of Cornwall Ave is of value as a natural green space of value to the community.
 It forms ^{a natural} part of a green corridor, abutting the canal and is also of historic interest.
 Already rich in wildlife habitats which would be lost.
 Has local/community value.

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The field at the end of Cornwall Ave should be removed from the Severn Trent Housing Site.

It should be designated Local Green Space & included in Policy 27. and the field to the rear of East Cres, Elmick Drive could be included as a ^{green} buffer between existing housing and the Severn Trent Site.

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

30 October 2017

Dear Steffan

Broxtowe Local Plan Part 2 Consultation

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

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

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

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

Potential Site Allocations Sites Adjacent to the Main Urban Area

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

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

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

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

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

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

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

Yours sincerely




NHS Nottingham West CCG

Broxtowe Part 2 Local Plan



Broxtowe
Borough
COUNCIL

Agent

Please provide your client's name

Your Details

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

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

Please tick here

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Broxtowe Part 2 Local Plan



Broxtowe
Borough
COUNCIL

Agent

Please provide your client's name

Your Details

Title	Mr	Mrs	Miss	Ms	Other:MISS
Name	[REDACTED]				
Organisation (if responding on behalf of the organisation)	Beeston Wildlife Group				
Address	[REDACTED]				
Postcode	[REDACTED]				
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	Policy 24: The health impacts of development		
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	Policy 26: Travel Plans		
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	Policy 29: Cemetery Extensions		
	Policy 30: Landscape		
	Policy 31: Biodiversity Assets		
	Policy 32: Developer Contributions		
	Policies Map	12	
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	yes	
2.2	Compliant with the duty to co-operate		no
2.3	Sound		no

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

If you think this paragraph or policy of the Plan is not sound, is this because:	
It is not justified	yes
It is not effective	no
It is not positively prepared	no
It is not consistent with national policy	no

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.

Including the field at the end of Cornwall Avenue in the Severn Trent housing site is 'not justified' as it is of greater value to the local community as a natural green space for the following reasons - It's a locally valued feature, being a small field of naturalised grass surrounded by mature hedgerows. - It's essential to the character and amenity of Cornwall Ave, being the focal point of this road. - It's of recreational value to walkers/dog owners who use the field every day, shown by the well-worn paths. - It's of historic interest: field & adjacent canal are over 200yrs old / field contains remains of an ancient track. - It's a haven for wildlife (including notable species) with grassland, mature hedgerows, & waterside habitats. - It's part of a green corridor stretching from canal almost to Lilac Grove – an important route for wildlife. - It's an easily accessible pocket of 'countryside' between Rylands and new Boots development. - Its value to the community was demonstrated at Broxtowe's July C.A.T. (Community Action Team) meeting where local folk voted unanimously (48 votes) to keep this field & not build here (vote verified by Cllr Cullen).

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.

a) Cornwall Ave field (with its surrounding hedgerows) should be removed from the Severn Trent housing site. b) Cornwall Ave field (with its surrounding hedgerows) should be designated as 'Local Green Space' on the Local Plan. This would be 'justified' as the field is of special value to the local community, as described above. c) The adjacent field (which extends alongside the full length of Leyton Crescent Recreation Ground) should also be included in the 'Local Green Space'. This 2nd field is an equally valued local feature of grassland surrounded by mature hedgerows, as the 2 fields together form a half mile strip of 'countryside' between the Rylands and the Severn Trent site, stretching from the canal up to Leyton Crescent. This is a locally important route for wildlife, and is a route enjoyed daily by walkers and dog owners throughout the year, as proved by the well-worn paths. The local value of this 2nd field has also been expressed repeatedly at Broxtowe's C.A.T. meetings. Designation as 'Local Green Space' is therefore 'justified'.

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.**

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Broxtowe Part 2 Local Plan

Agent

Please provide your client's name

Your Details

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

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Please tick here

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Policies Map	12		
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Do you consider this paragraph or policy of the Local Plan to be: <i>(please refer to the guidance note at for an explanation of these terms)</i>		Yes	No
2.1	Legally compliant	yes	
2.2	Compliant with the duty to co-operate		no
2.3	Sound		no

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
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Your comments

<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. Please be as precise as possible. Continue on an extra sheet if necessary.</p>

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It's a haven for wildlife (including notable species) with grassland, mature hedgerows & waterside habitats.

It's an easily accessible pocket of 'countryside' between Rylands and new Boots development.

It's a locally valued feature, being a small field of naturalised grass surrounded by mature hedgerows.

It's essential to the character and amenity of Cornwall Ave, being the focal point of this road. - It's of recreational value to walkers/dog owners who use the field every day, shown by the well-worn paths.

Its value to the community was demonstrated at Broxtowe's July C.A.T. (Community Action Team) meeting where local folk voted unanimously (48 votes) to keep this field & not build here (vote verified by Cllr Cullen).

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This 2nd field is an equally valued local feature of grassland surrounded by mature hedgerows, as the 2 fields together form a half mile strip of 'countryside' between the Rylands and the Severn Trent site, stretching from the canal up to Leyton Crescent.

This is a locally important route for wildlife, and is a route enjoyed daily by walkers and dog owners throughout the year, as proved by the well-worn paths.

The local value of this 2nd field has also been expressed repeatedly at Broxtowe's C.A.T. meetings. Designation as 'Local Green Space' is therefore 'justified'.

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Broxtowe Part 2 Local Plan



Broxtowe
Borough
COUNCIL

Agent

Please provide your client's name

Your Details

Title	Mr	Mrs	Miss	Me	Other: Dr
Name	[REDACTED]				
Organisation (if responding on behalf of the organisation)	Beeston Wildlife Group				
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]				
Postcode	[REDACTED]				
Tel. Number	[REDACTED]				
E-mail address	[REDACTED]				

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

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	Policy 32: Developer Contributions		
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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	yes	
2.2	Compliant with the duty to co-operate		no
2.3	Sound		no

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

If you think this paragraph or policy of the Plan is not sound, is this because:	
It is not justified	yes
It is not effective	no
It is not positively prepared	no
It is not consistent with national policy	no

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.

Map 12: Severn Trent Beeston



To include the field at the end of Cornwall Avenue, coloured in **green on Map 12**, in the Severn Trent housing site is '**not justified**' as it is of greater value to the local community as a natural green space. It is:

- a) Part of a green corridor stretching from the canal almost to Lilac Grove – an important route for wildlife;
- b) Of historic interest: the field and adjacent canal are over 200 years old, and the field contains remains of an ancient track;
- c) A haven for wildlife (including notable species) with grassland, mature hedgerows and waterside habitats;
- d) An easily accessible pocket of 'countryside' between Beeston Rylands and new Boots development.;
- e) A locally valued feature, being a small field of naturalised grass surrounded by mature hedgerows;
- f) Essential to the character and amenity of Cornwall Avenue, of which the field is a focal point;
- g) Of recreational value to walkers/dog owners who use the field daily. This is evidenced by the well-worn nature of the paths.

Furthermore, its value to the community was demonstrated at Broxtowe's July Community Action Team (C.A.T.) meeting where local people voted unanimously (48 votes) to keep this field and not build here (vote verified by Cllr Cullen).

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 consider the following modifications necessary to make the Local Plan 'sound':

- Cornwall Avenue field (with its surrounding hedgerows), coloured in **green on Map 12**, should be removed from the Severn Trent housing site;
- Cornwall Avenue field (with its surrounding hedgerows), coloured in **green on Map 12**, should be designated as 'Local Green Space' on the Local Plan. This would be 'justified' as the field is of special value to the local community, as described above;
- The adjacent field (which extends alongside the full length of Leyton Crescent Recreation Ground), coloured in **yellow on Map 12**, should also be included in the 'Local Green Space'.



These modifications will make the Local Plan 'sound' because:

- This second field is an equally valued local feature of grassland surrounded by mature hedgerows, as the two fields together form a half mile strip of countryside between Beeston Rylands and the Severn Trent site, stretching from the canal up to Leyton Crescent;
- This is a locally important route for wildlife, and is a route enjoyed daily by walkers and dog owners throughout the year, as proved by the well-worn paths;
- The local value of this second field has also been expressed repeatedly at Broxtowe's C.A.T. meetings, which 'justifies' its designation as 'Local Green Space'.

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.**

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Broxtowe Part 2 Local Plan



Broxtowe
Borough
COUNCIL

Agent

Please provide your client's name

Your Details

Title	Mr	Mrs	Miss	Ms	Other	
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Organisation (if responding on behalf of the organisation)	Beeston Wildlife Group					
Address						
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E-mail address						

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Broxtowe Part 2 Local Plan



Broxtowe
Borough
COUNCIL

Agent

Please provide your client's name

Your Details

Title	Mr	Mrs	Miss	Ms	Other	<input type="checkbox"/>
Name	<input type="text"/>					
Organisation (if responding on behalf of the organisation)	Beeston Wildlife Group					
Address	<input type="text"/>					
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Policy: 3.5 Severn Trent, Beeston

3.13 Located in the Main Built up Area of Nottingham, the site is located to the south east of Beeston Town Centre and is situated directly adjacent to the Strategic Core Strategy allocation of Boots (to the east) in-between the Beeston Canal (to the south), the railway line (to the north) and the existing residential area of Beeston Rylands to the west. The site is brownfield and has previously been used as a sewage treatment works by Severn Trent Water.

3.14 The following key development requirements must be met.

Key Development Requirements:

- 150 homes to be located towards the north of the site.
- Provide soft landscaping and minimise external lighting along the canal side boundary.
- Provide enhanced Green Infrastructure corridors linking urban areas of Beeston to the north and west with the canal side towpath.
- Provide pedestrian bridge to link to the canal side towpath.
- Vehicle access to only be at the north of the site onto Lilac Grove.

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

3.15 This allocation has significant housing, health, transport and innovation (due to the Enterprise Zone) objectives benefits; and only minor negative effect on the biodiversity and green infrastructure objective due to the adjoining Beeston Canal Local Wildlife Site.

Map 12: Severn Trent Beeston



Broxtowe Part 2 Local Plan



Broxtowe
Borough
COUNCIL

Agent

Please provide your client's name

Your Details

Title	Mr	Mrs	Miss	Ms	Other:
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Broxtowe Part 2 Local Plan

Agent

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Policy: 3.5 Severn Trent, Beeston

3.13 Located in the Main Built up Area of Nottingham, the site is located to the south east of Beeston Town Centre and is situated directly adjacent to the Strategic Core Strategy allocation of Boots (to the east) in-between the Beeston Canal (to the south), the railway line (to the north) and the existing residential area of Beeston Rylands to the west. The site is brownfield and has previously been used as a sewage treatment works by Severn Trent Water.

3.14 The following key development requirements must be met.

Key Development Requirements:

- 150 homes to be located towards the north of the site.
- Provide soft landscaping and minimise external lighting along the canal side boundary.
- Provide enhanced Green Infrastructure corridors linking urban areas of Beeston to the north and west with the canal side towpath.
- Provide pedestrian bridge to link to the canal side towpath.
- Vehicle access to only be at the north of the site onto Lilac Grove.

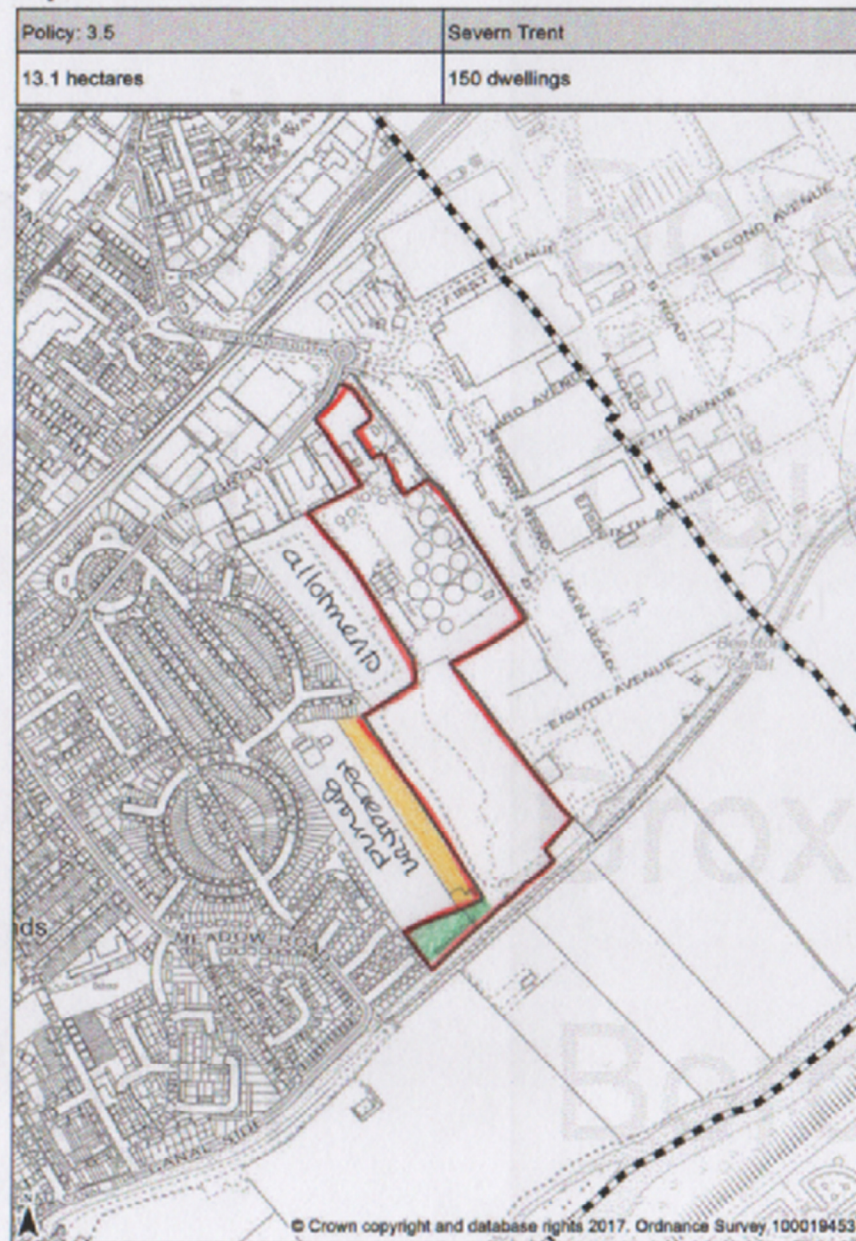
Key Development Aspirations;

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

3.15 This allocation has significant housing, health, transport and innovation (due to the Enterprise Zone) objectives benefits; and only minor negative effect on the biodiversity and green infrastructure objective due to the adjoining Beeston Canal Local Wildlife Site.

Map 12: Severn Trent Beeston



Broxtowe Part 2 Local Plan



Broxtowe
Borough
COUNCIL

Agent

Please provide your client's name

Your Details

Title	Mr	Mrs	Miss	Ms	Other	
Name						
Organisation (if responding on behalf of the organisation)	Beeston Wildlife Group					
Address						
Postcode						
Tel. Number						
E-mail address						

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

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

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

Please tick here

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Broxtowe Part 2 Local Plan



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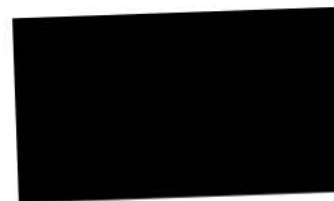
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- '**Positively Prepared**': This means the Local Plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it 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**.



6882



3rd November 2017

Broxtowe Labour Group response to the Local Plan Part 2

Dear Steffan

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Yours sincerely,

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

Broxtowe Part 2 Local Plan



Broxtowe
Borough
COUNCIL

Agent

Please provide your client's name	Mrs D Viitanen
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Your Details

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

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

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

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

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

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

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

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

Your comments

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

Yes, I wish to participate at the public examination

✓

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

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

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

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

Broxtowe Part 2 Local Plan



Broxtowe
Borough
COUNCIL

Agent

Please provide your client's name	Mrs Marjorie Barnes
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Your Details

Title	<input checked="" type="radio"/> Mr <input type="radio"/> Mrs <input type="radio"/> Miss <input type="radio"/> Ms <input type="text"/> Other:
Name	[REDACTED]
Organisation (if responding on behalf of the organisation)	Featherstones
Address	[REDACTED] [REDACTED] [REDACTED]
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It is not positively prepared	✓
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Yes, I wish to participate at the public examination	✓
No, I do not wish to participate at the public examination	
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<p>We wish to participate at public examination to explore fully the concerns we have with the soundness of the Plan.</p>	

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Broxtowe Part 2 Local Plan



Broxtowe
Borough
COUNCIL

Agent

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

Your Details

Title	<input checked="" type="radio"/> Mr <input type="radio"/> Mrs <input type="radio"/> Miss <input type="radio"/> Ms <input type="text"/> Other:
Name	[REDACTED]
Organisation (if responding on behalf of the organisation)	Featherstones
Address	[REDACTED] [REDACTED] [REDACTED]
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**BROXTOWE LOCAL PLAN PART 2:
PUBLICATION VERSION**

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

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

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

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

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

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

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

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

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

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

And they recommend that plans:

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

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

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

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

Contents

Representations:

- 1.0 Introduction**
- 2.0 Housing Delivery**
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- 4.0 Approach to self-build and custom-build housing – Policy 15**
- 5.0 Policy 17: Place – Making, Design and Amenity**

Appendices:

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

1.0 Introduction

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

2.0 Housing Delivery

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

And they recommend that plans:

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

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

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

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

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

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

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

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

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

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

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

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

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

Or

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

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

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

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

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

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

5.0 Policy 17: Place – Making, Design and Amenity

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

Broxtowe Part 2 Local Plan



Broxtowe
Borough
COUNCIL

Agent

Please provide your client's name	Bloor Homes Ltd
-----------------------------------	-----------------

Your Details

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

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

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

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

Please tick here ☒

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

For more information including an online response form please visit:

www.broxtowe.gov.uk/part2localplan

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

Please return completed forms to:

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

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

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

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

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

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

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

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

Your comments

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

See attached Statement

Question 4: Modifications sought

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

See attached Statement

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

Question 5: Public Examination Attendance

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

Yes, I wish to participate at the public examination

√

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

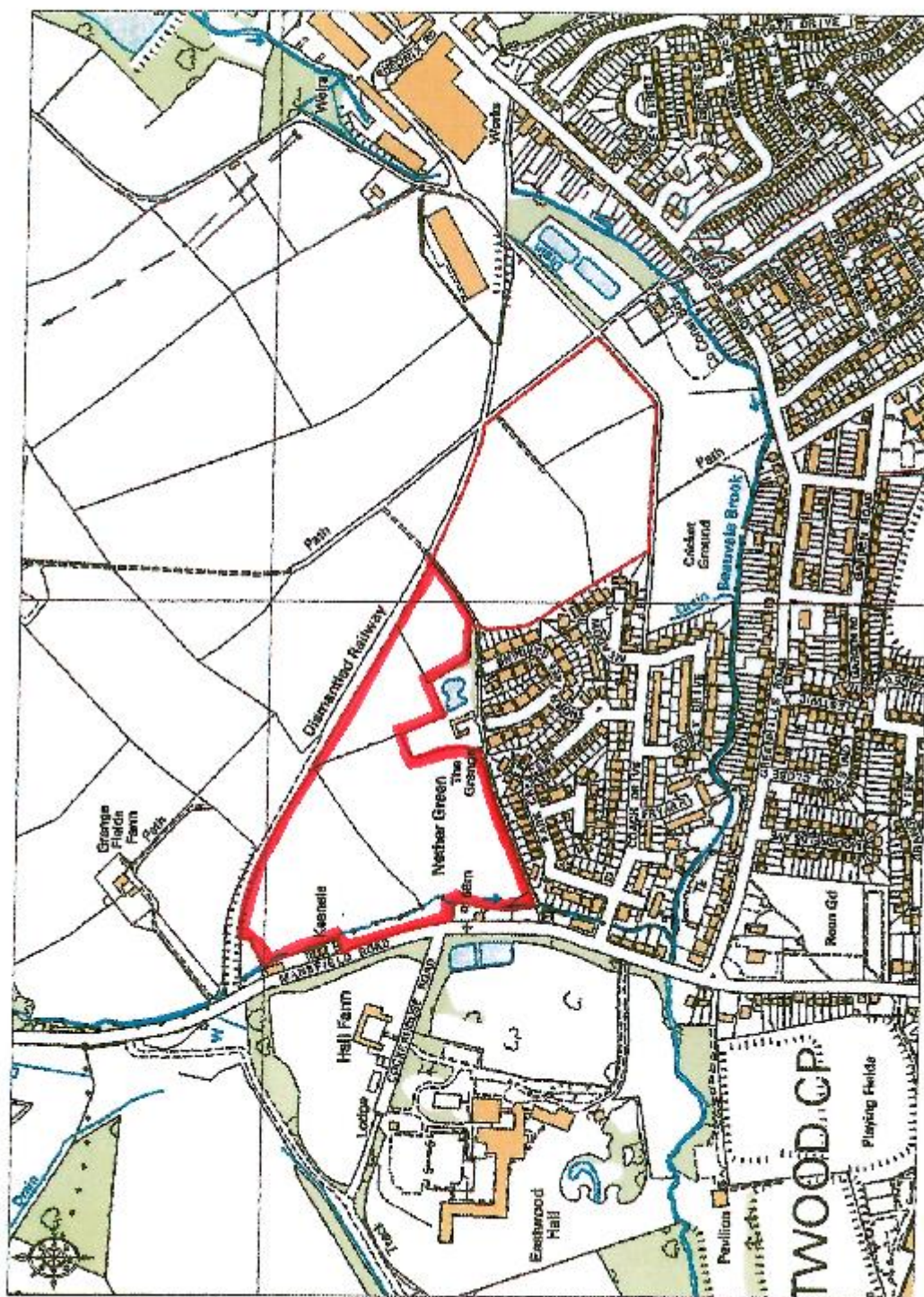
If you wish to participate at the public examination, please outline why you consider this to be necessary

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

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

Appendix One:

Site location plan:



DEFINE

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

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

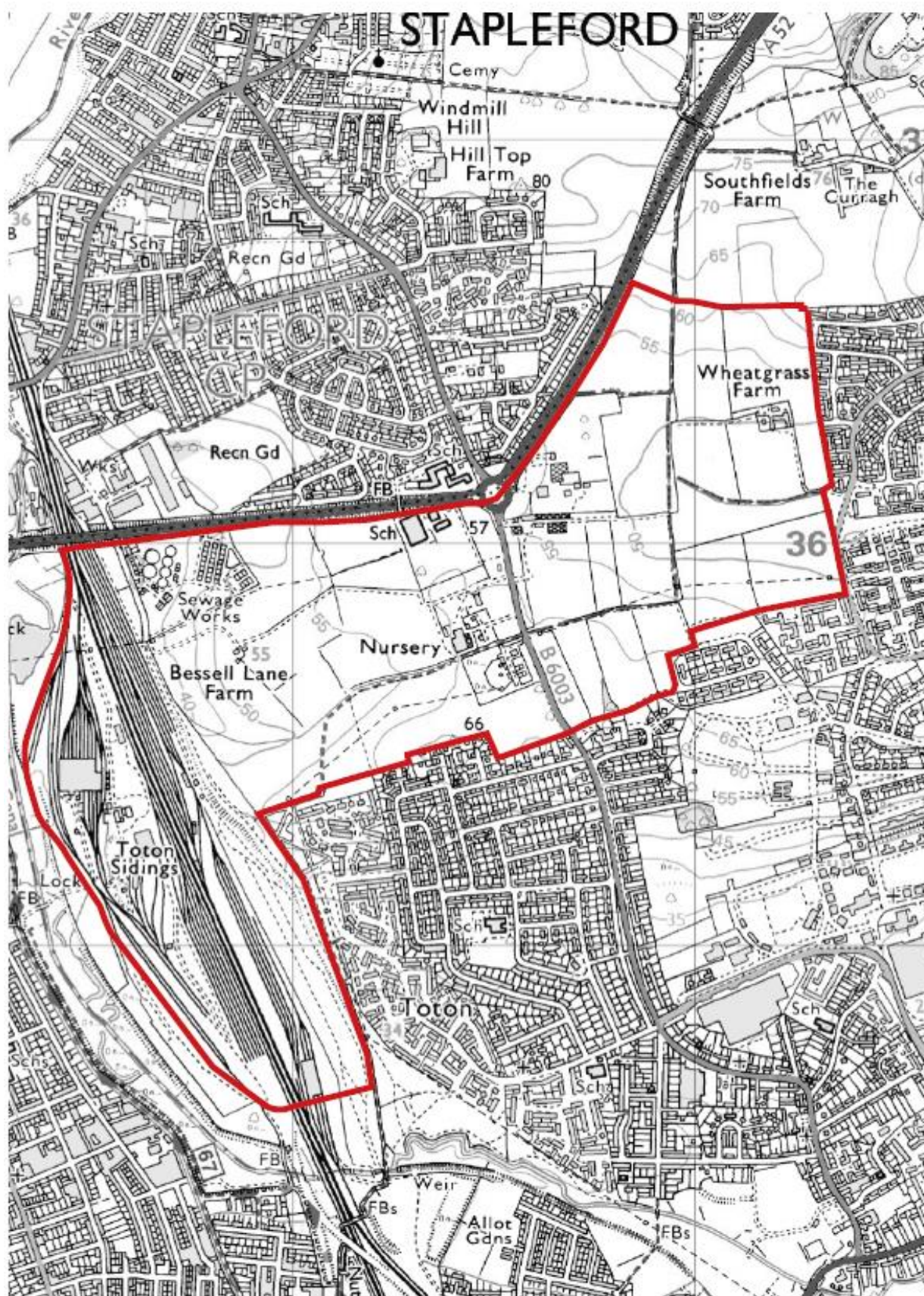


Rev	Drwg No	Client	Project	Title	Scale
F	065_SK01	Bloor Homes	Land at Eastwood	Sketch Masterplan	1:2,500 @ A3



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

Appendix 2



J:\5530\553081_AltCellPlan\553081-L-17 Proposed Green Belt Boundary Indr

BROXTOWE GATEWAY VISION

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

April 2013



WALKER ENGINEERING



BLOOR HOMES®

PREFACE

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

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

This submission proposes an alternative, bolder vision.

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

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

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EXECUTIVE SUMMARY

Our Vision And Concept For The Broxtowe Gateway

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

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

Our vision and concept for the Broxtowe Gateway includes:

- **New works to eliminate traffic congestion;**
- **Up to 4000 new jobs¹;**
- **Retention of the Green Belt north of Toton and Chilwell;**
- **Up to 1200 dwellings alongside the NET**

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

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

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

Executive Summary - Plans



INTRODUCTION

HS2

High Speed Rail is coming to Broxtowe.

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

It will mean jobs and investment.

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

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

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



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

BACKGROUND & CONTEXT

Greater Nottingham & The Wider Region

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

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

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

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

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

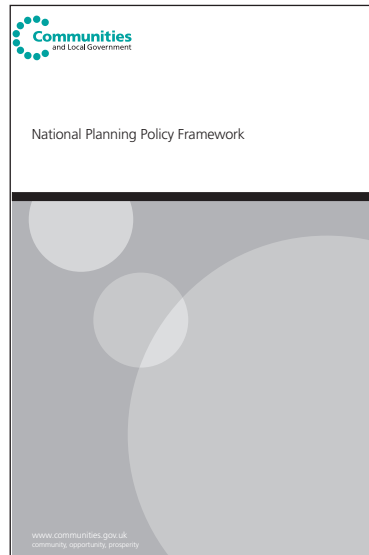
The National Planning Policy Framework (NPPF) provides clear and positive guidance on the importance of planning for economic growth. It emphasises the importance of a positive approach to meeting development needs and requires the planning system to “respond positively to wider

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

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

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

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



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

NPPF, para 157

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

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

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

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

NPPF, para 20

WHY?

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

The National Vision

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

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

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

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

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

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

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

HS2 Ltd

The Local Opportunity

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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



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

WHERE?

An Alternative Broad Location For Growth

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

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

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

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

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

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

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

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

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

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

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

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

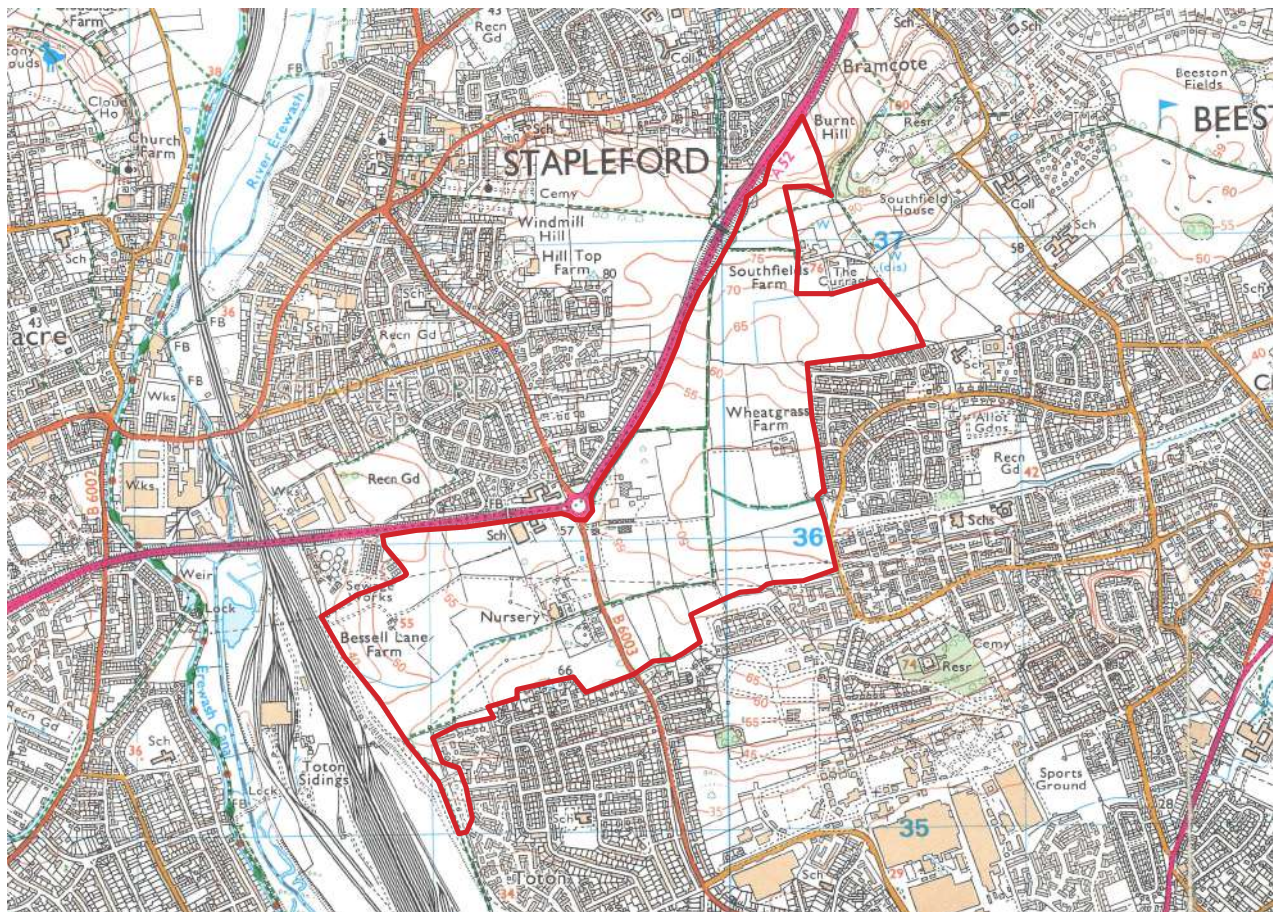
As described in Appendix iii, the most important reasons given by Tribal for discounting this area

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

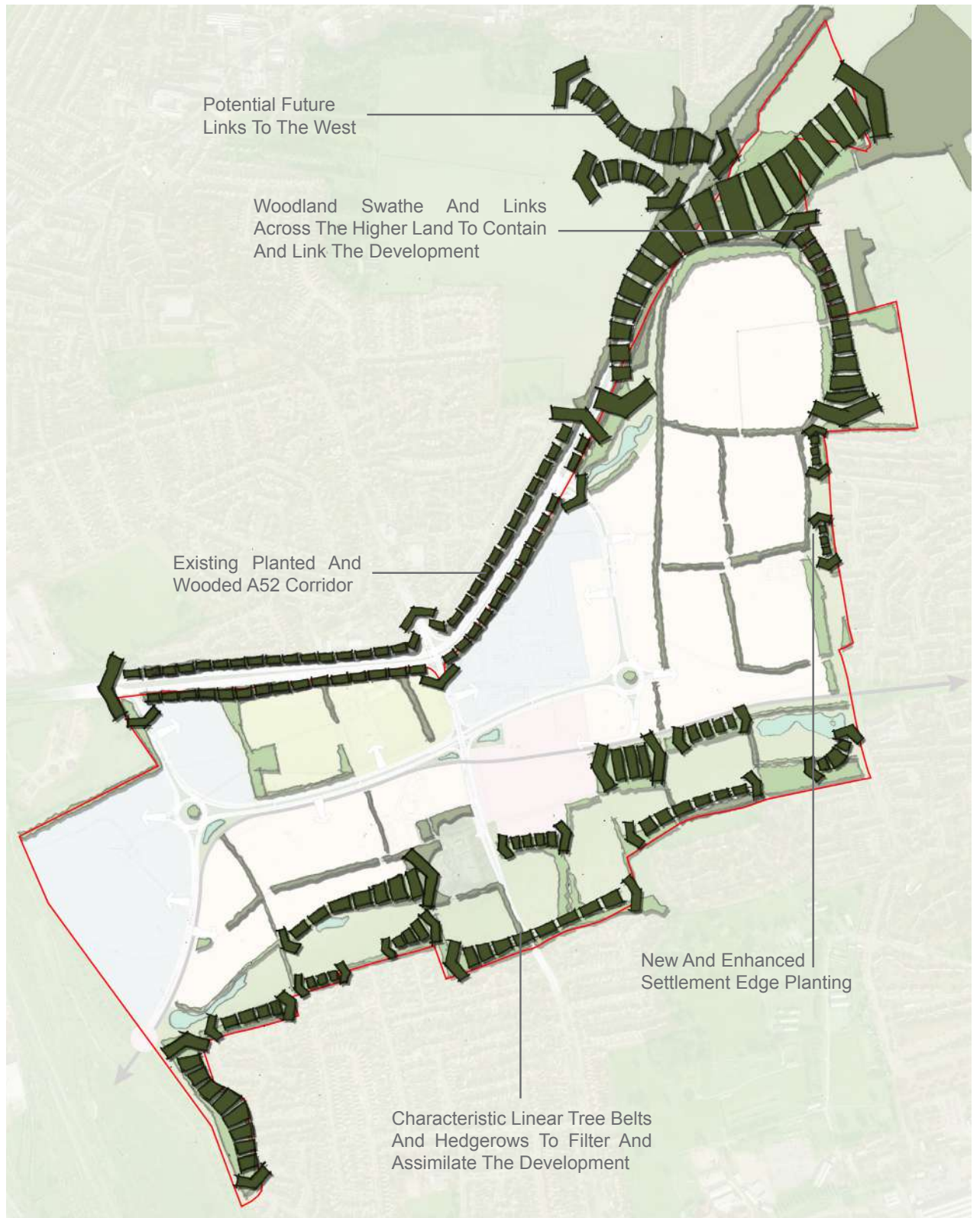
are instead important factors that can and could be used positively to shape suitable development at this location. A high quality response to these issues should realise the creation of a distinctive new place drawn from a clear understanding of the existing environment, and both current and planned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

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


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



Vegetation Corridor Plan



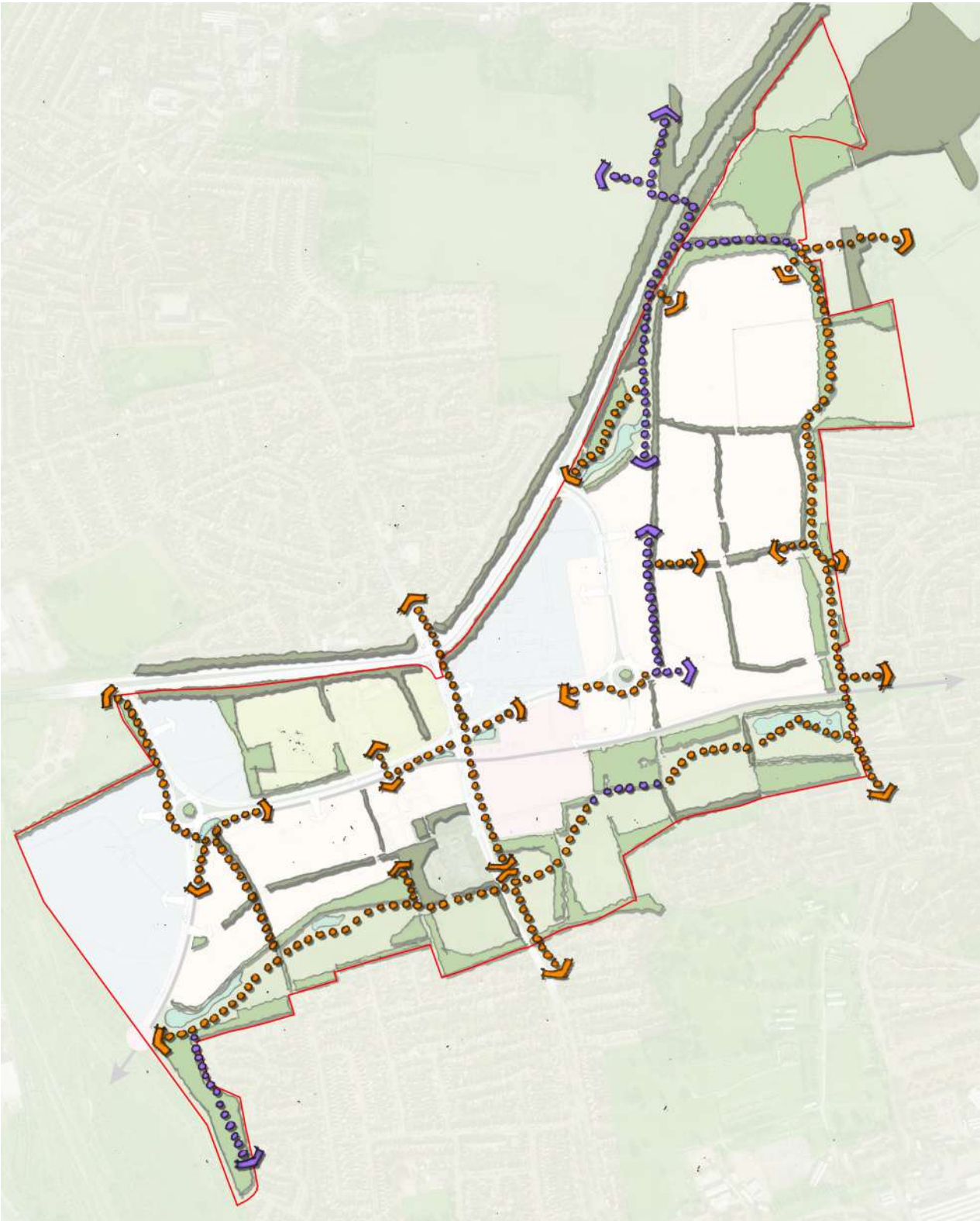
 Site Boundary
350.4 Acres

 Proposed Vegetation Corridors



0 100 200 300 400 500m

Public Rights Of Way Plan



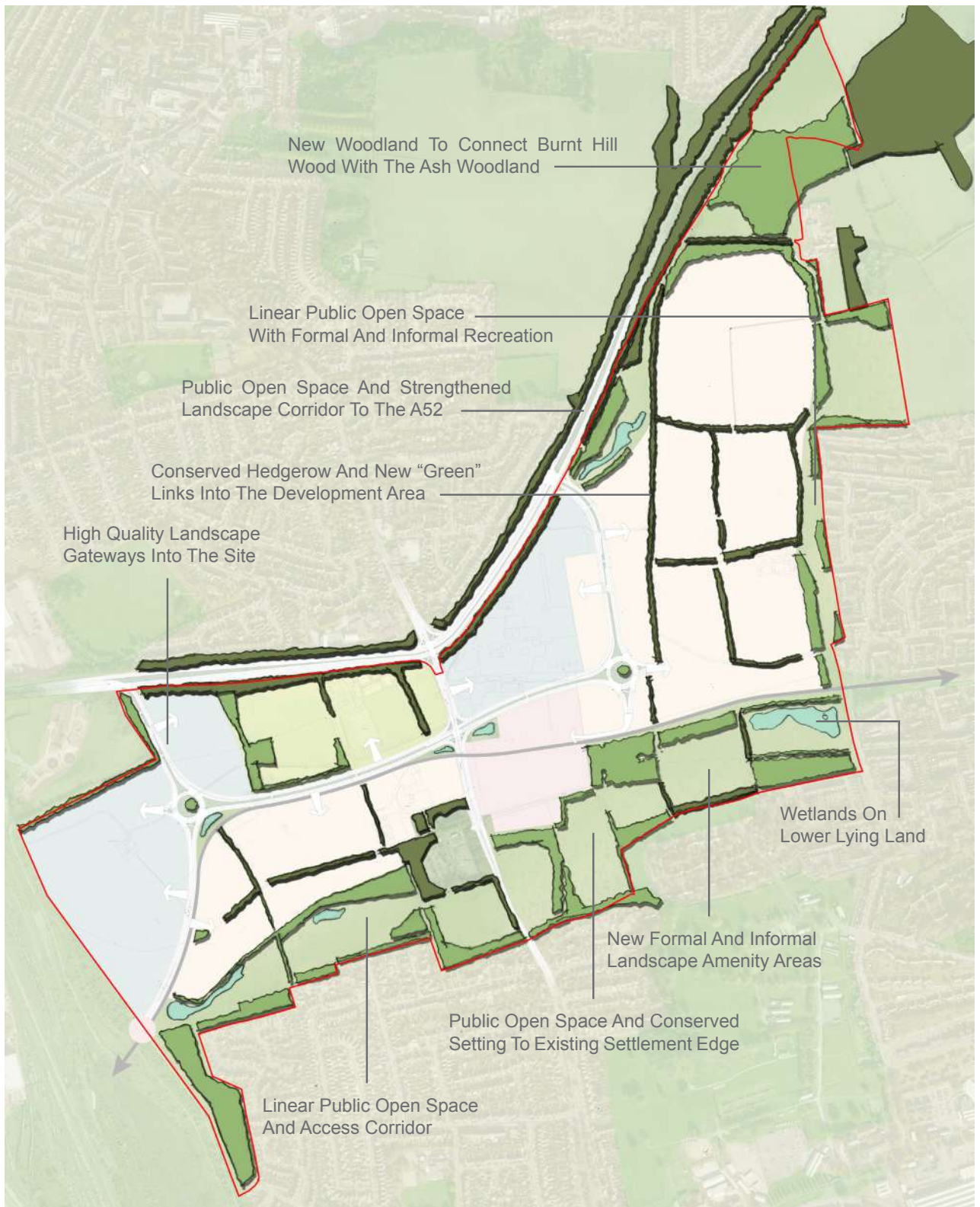
Site Boundary
350.4 Acres

Existing Public Rights Of Way

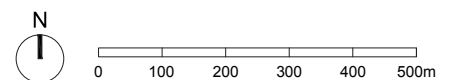
Proposed Public Rights Of Way



Green infrastructure Plan



Site Boundary 350.4 Acres
 Existing Vegetation
 Proposed Vegetation
 Proposed Balancing Pond



WHAT?

What Is The Proposed Vision For The Broxtowe Gateway?

Our proposal is bold and ambitious.

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

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

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

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

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

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

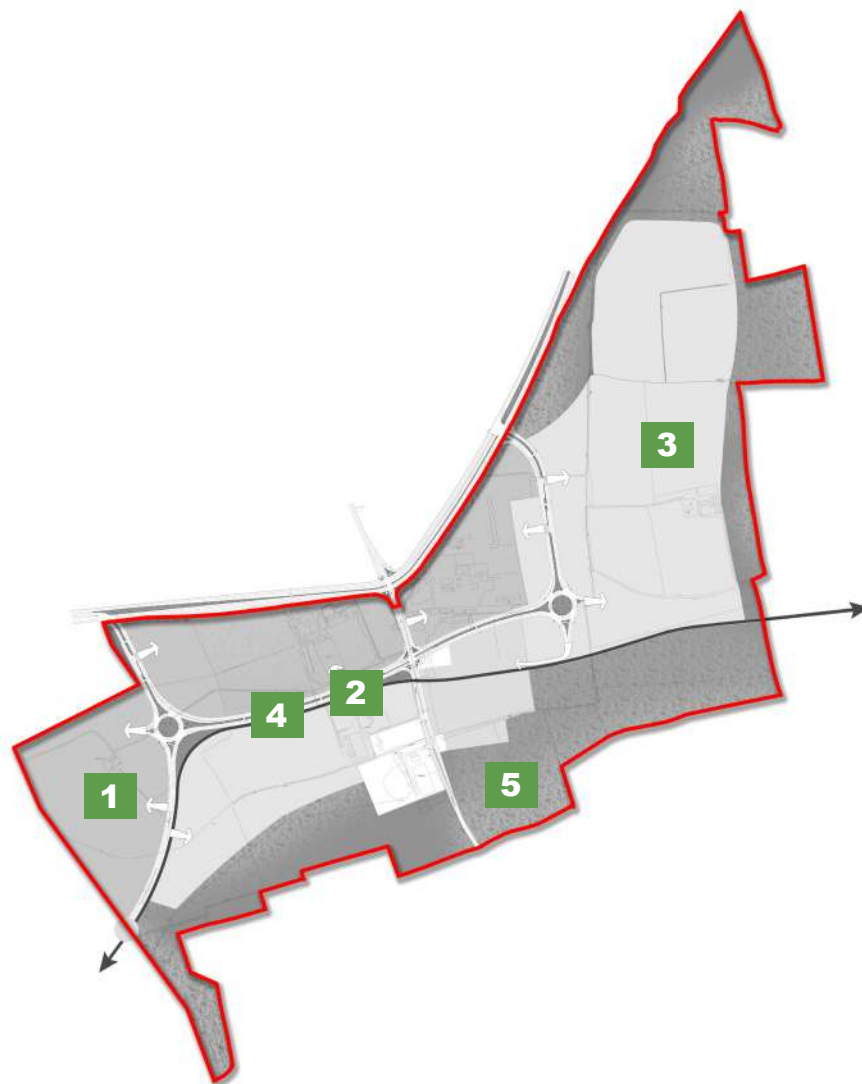
“Eliminate existing traffic congestion.”

(Appendix ii, Access Technical Note)

DEVELOPMENT POTENTIAL

The concept plan incorporates the following fundamental elements:

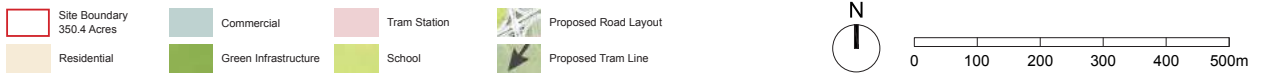
- 1** New employment uses focused on the areas closest to the HS2 station;
- 2** NET line extension running directly to the south of the existing Secondary School, offering opportunities for sustainable access by local students;
- 3** Residential development to include a range of densities, with potential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



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

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

Development Potential Plan



Reconfigured Highway Junctions

Junction 1 – Bardills Cross-Roads

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

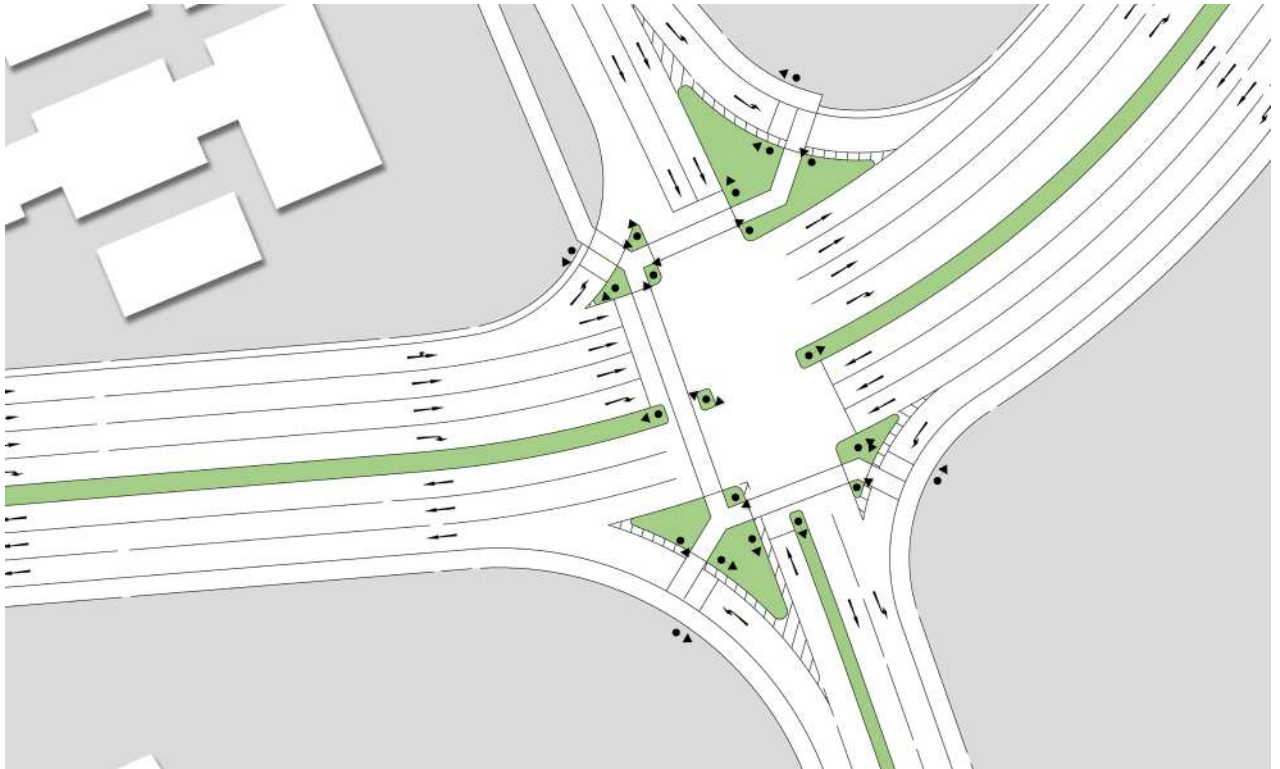
All right-turns would be banned at the new cross-roads. This would be enforced through the use of cameras and will enable the junction's traffic lights to operate in a simple two-phase manner, greatly increasing efficiency and capacity. As a result, modelling shows that the junction will be able to accommodate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

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

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

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

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

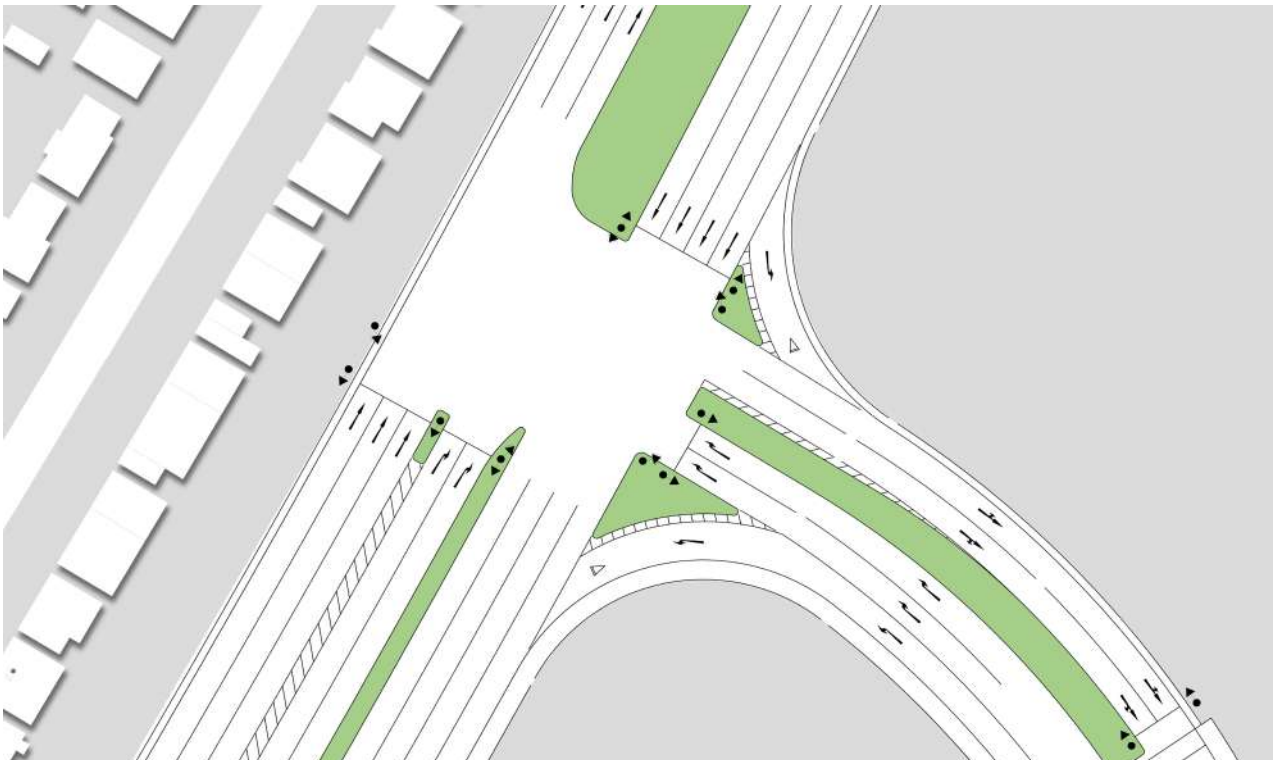


Junction 1 – Bardills Cross-Roads - Not To Scale

Junction 2 – Site Access (East)

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

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



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

Junction 3 – NET Access Roundabout

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

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



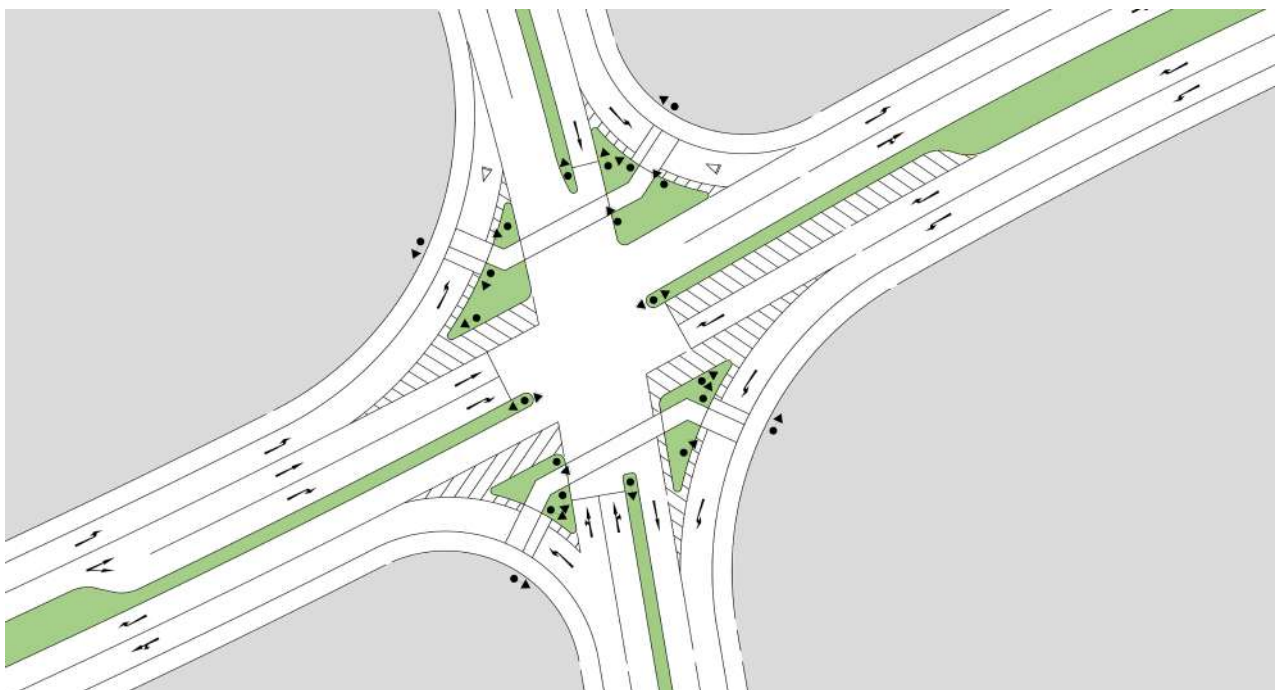
Junction 3 – NET Access Roundabout - Not To Scale

Junction 4 – Site Access (South)

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

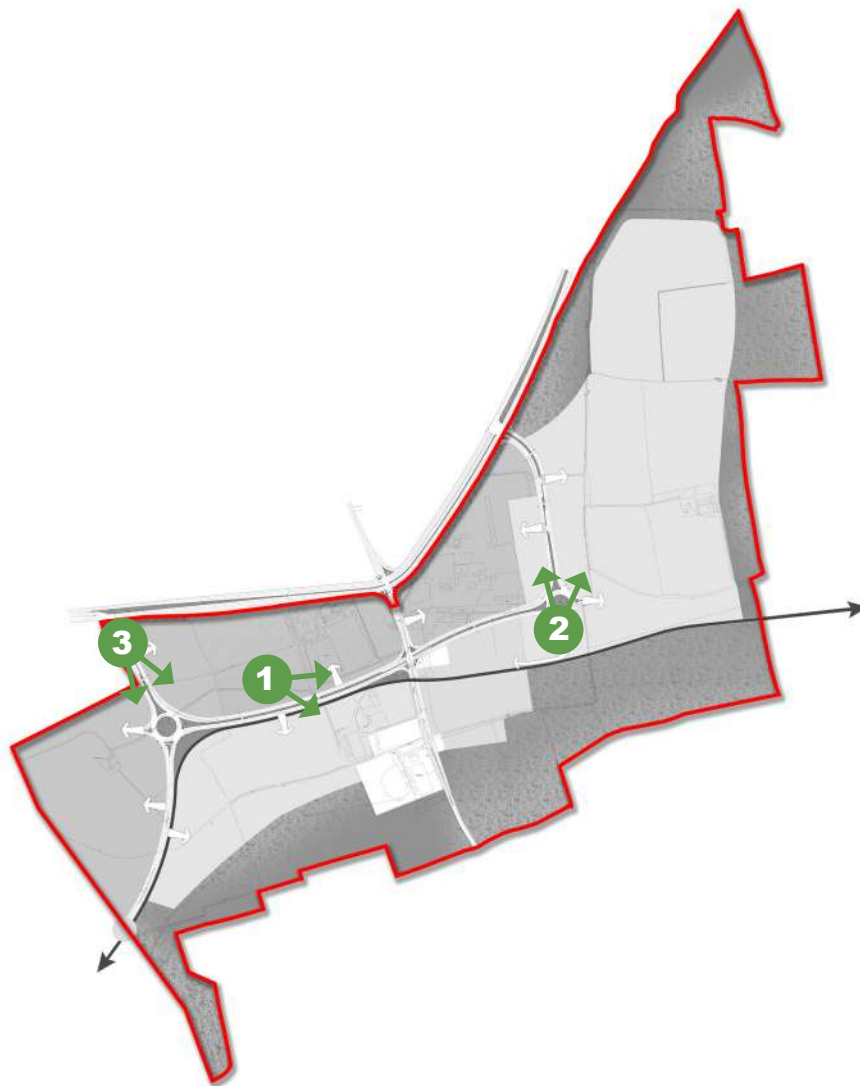
In its cross-roads configuration, the right-turn to the west from the southbound Toton Lane would be banned and re-provided for via Junctions 1, 2 and 3 in a clock-wise loop, with traffic then travelling straight across Junction 4 from east to west. In this mode, the lane layouts on the main dual carriageway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

Existing and future traffic congestion would be eliminated.



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

INDICATIVE SKETCHES



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

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



Sketch Viewpoint 1 - NET Integration

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

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



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



HOW?

How Should These Proposals And Vision Be Taken Forward?

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

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

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

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

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

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

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

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

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

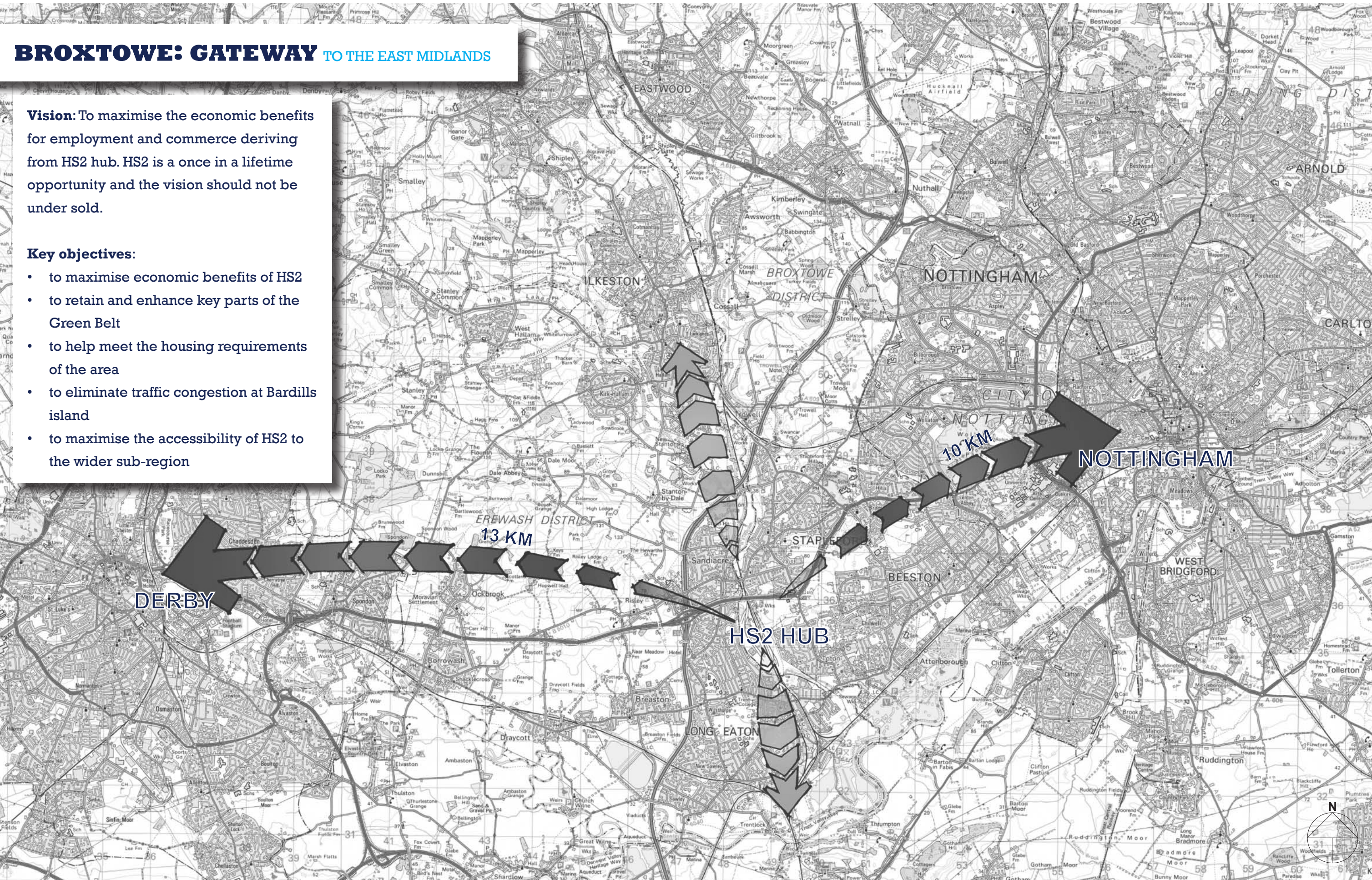
This Vision can be realised through a collective and joined-up approach, with the Council working with the consortium of developers and landowners to ensure the policy framework provides for a strategic broad location for growth.

BROXTOWE: GATEWAY TO THE EAST MIDLANDS

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

Key objectives:

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



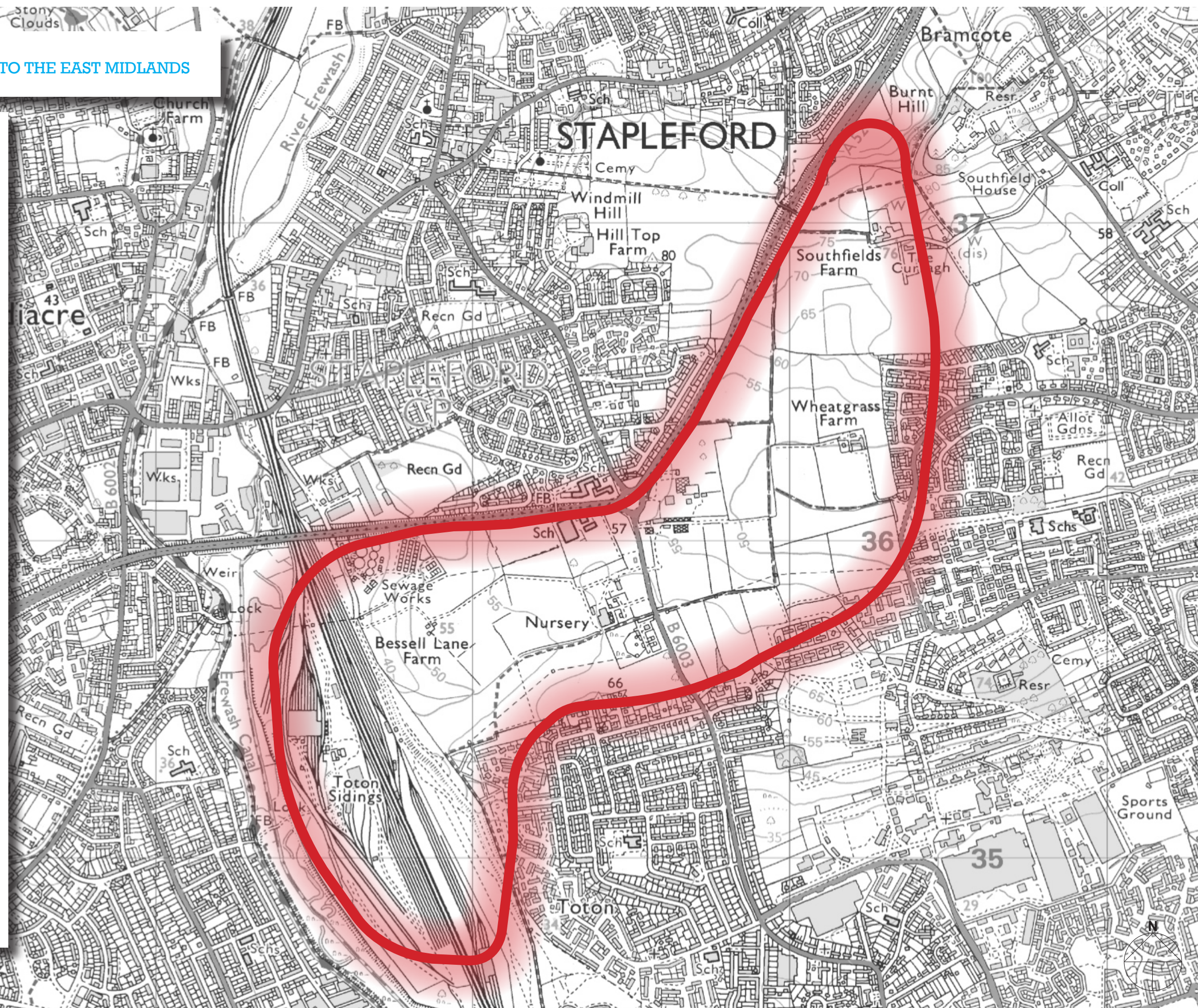
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BROXTOWE: GATEWAY TO THE EAST MIDLANDS

Experience from elsewhere:

- **Lille:** contains about 115 000sqm of commercial space [45 000sqm of offices, 31 000sqm of retail leisure and hotel space and 38 000sqm of business, conference and exhibition space]
- **Birmingham's** emerging masterplan response to HS2 proposes 600 000sqm of business space and 2000 new homes. It's ambition is to create 14 000 (net) new jobs and deliver a £1.3 billion economic uplift to the area
- **Solihull's** response to the HS2 opportunity is to prepare a masterplan for an M42 economic gateway which includes an HS2 Hub developed in the Green Belt and incorporating around 500 000sqm of new space and 16 000 new jobs.

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



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Broxtowe Gateway
Toton

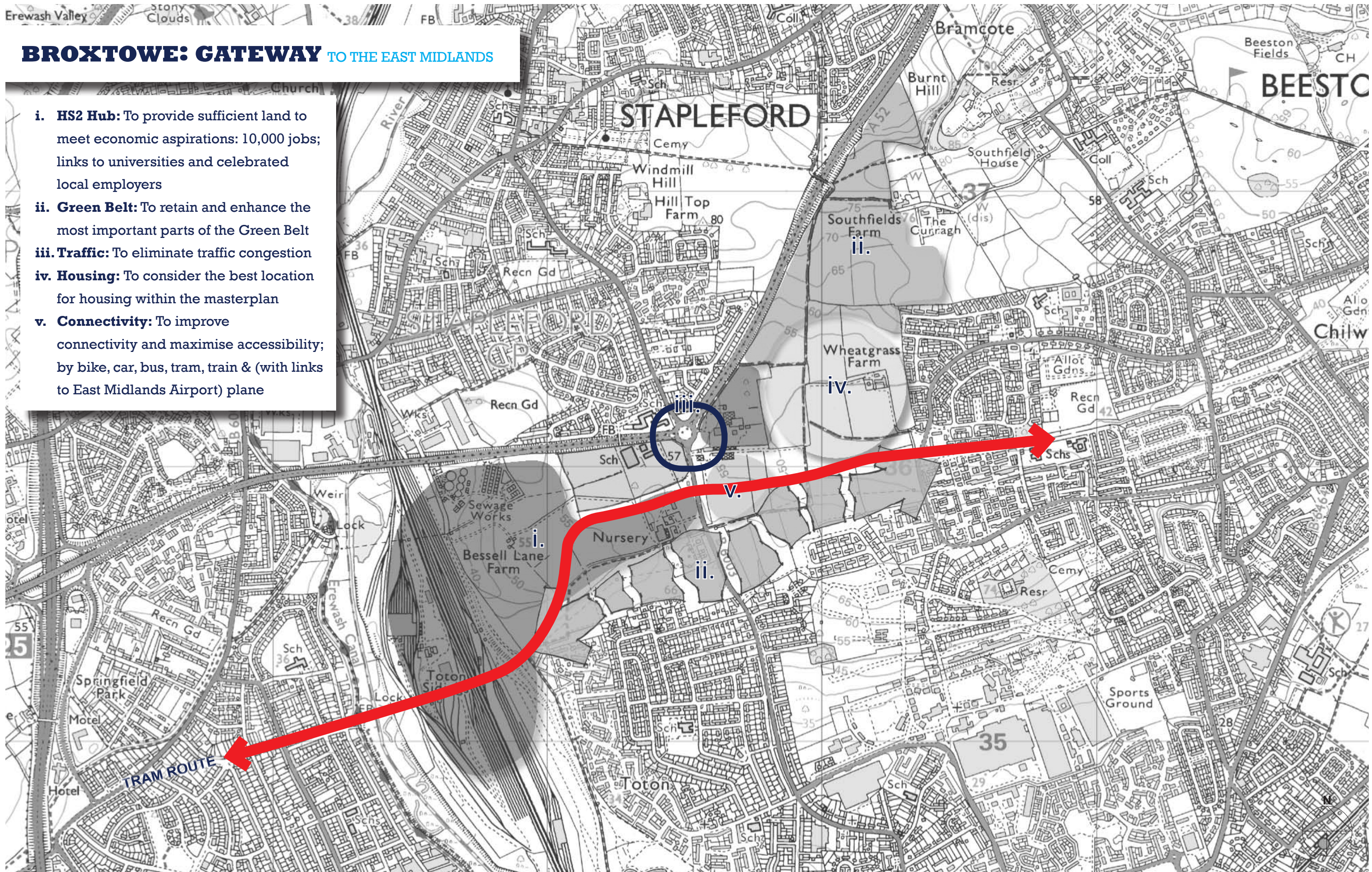
THE SITE

NTS@A3
March 2014

Oxalis
Planning

fpcr

masterplanning
environmental assessment
landscape design
urban design
ecology
architecture
arboriculture



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Bloors
Broxtowe Gateway
Toton

OBJECTIVES

NTS@A3
March 2014

Oxalis
Planning

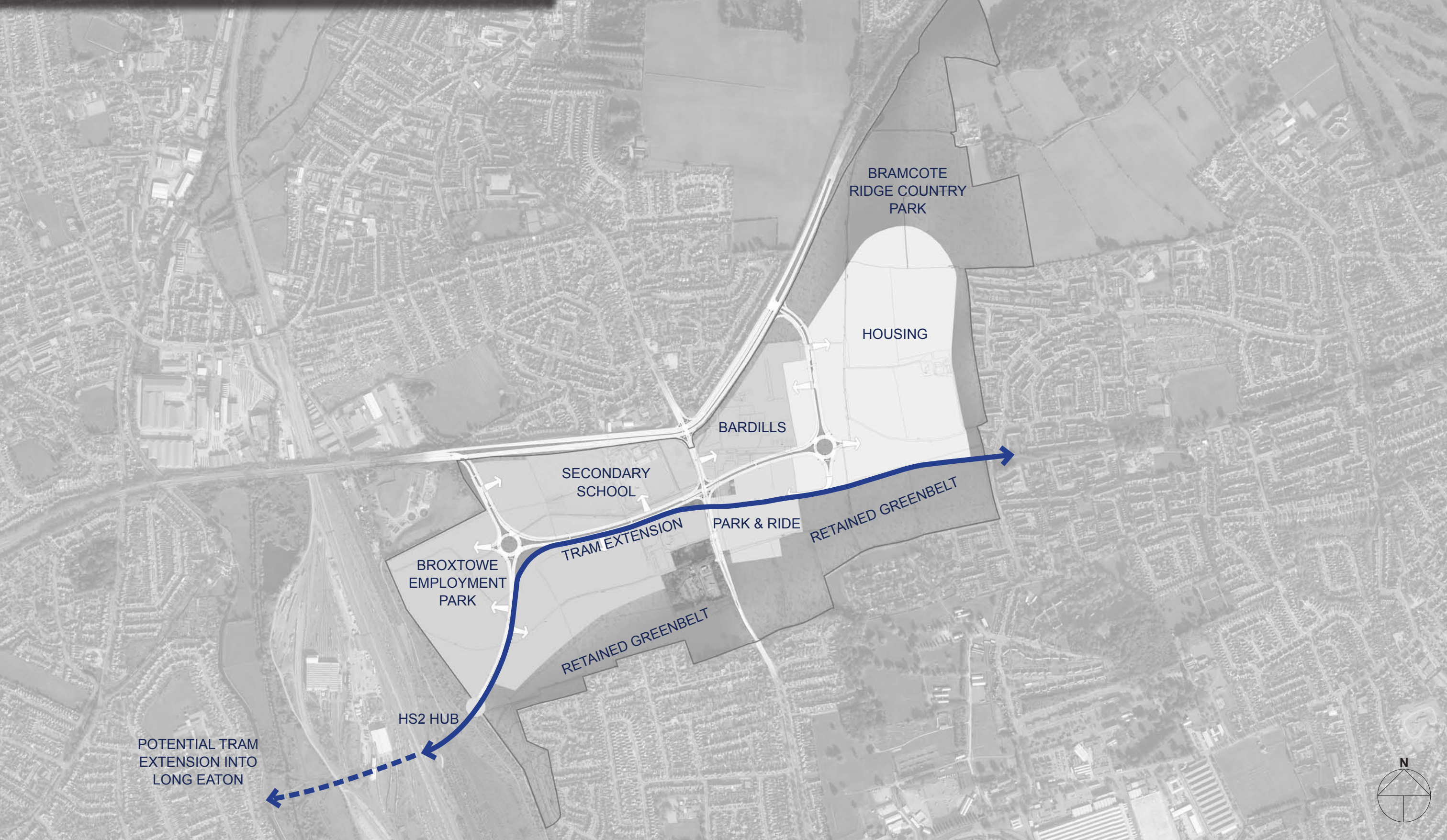
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BROXTOWE: GATEWAY TO THE EAST MIDLANDS



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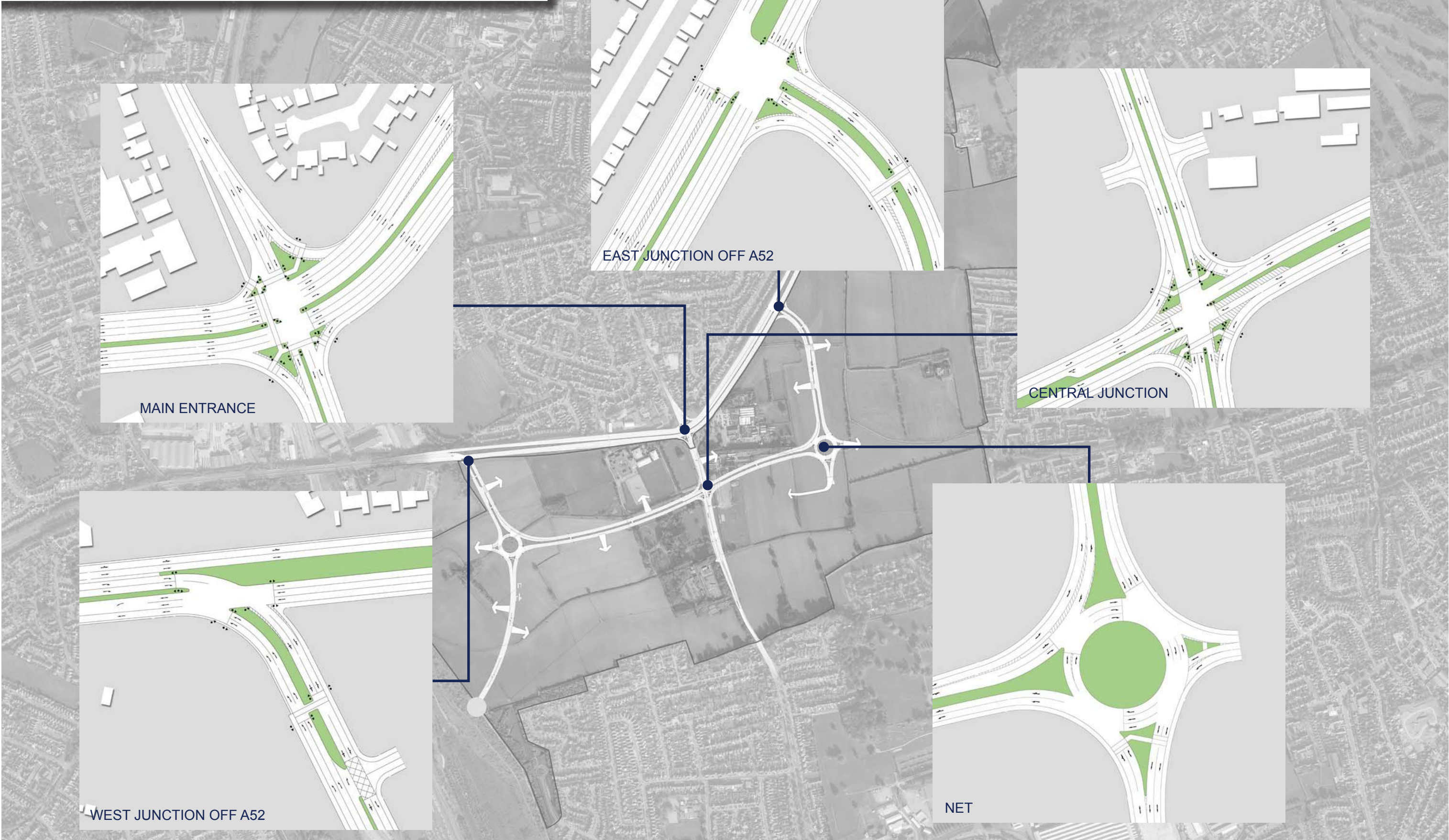
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Broxtowe Gateway
Toton

DELIVERY

NTS@A3
March 2014



BROXTOWE: GATEWAY TO THE EAST MIDLANDS



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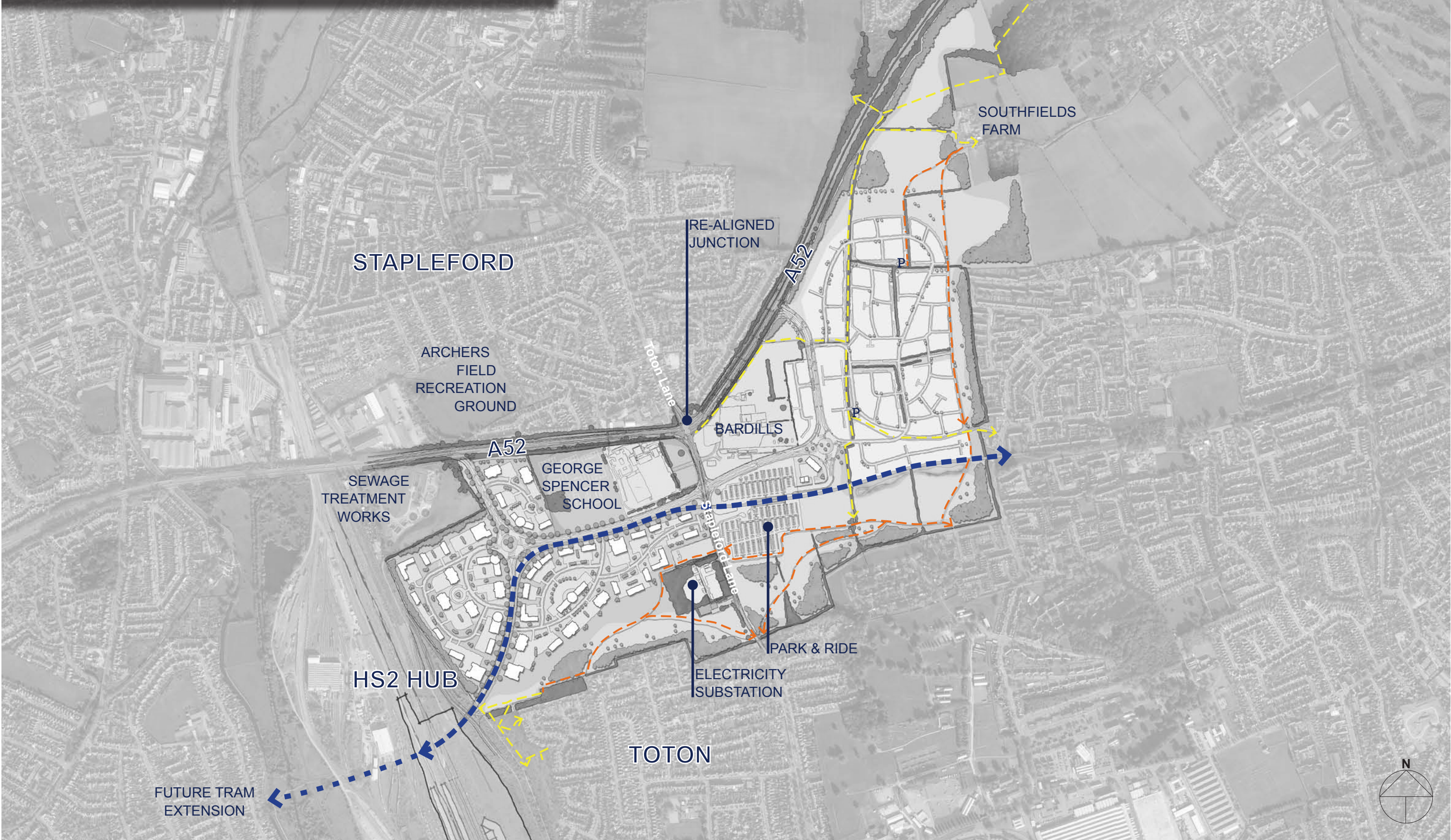
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Toton

TRAFFIC

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March 2014



BROXTOWE: GATEWAY TO THE EAST MIDLANDS

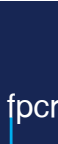


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Bloors
Broxtowe Gateway
Toton

CAPACITY PLAN

NTS@A3
March 2014



TOTON: STRATEGIC LOCATION FOR GROWTH

AN ALTERNATIVE RESPONSE TO THE UNIQUE OPPORTUNITIES PRESENTED BY HS2

THE VISION:

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

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

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



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

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

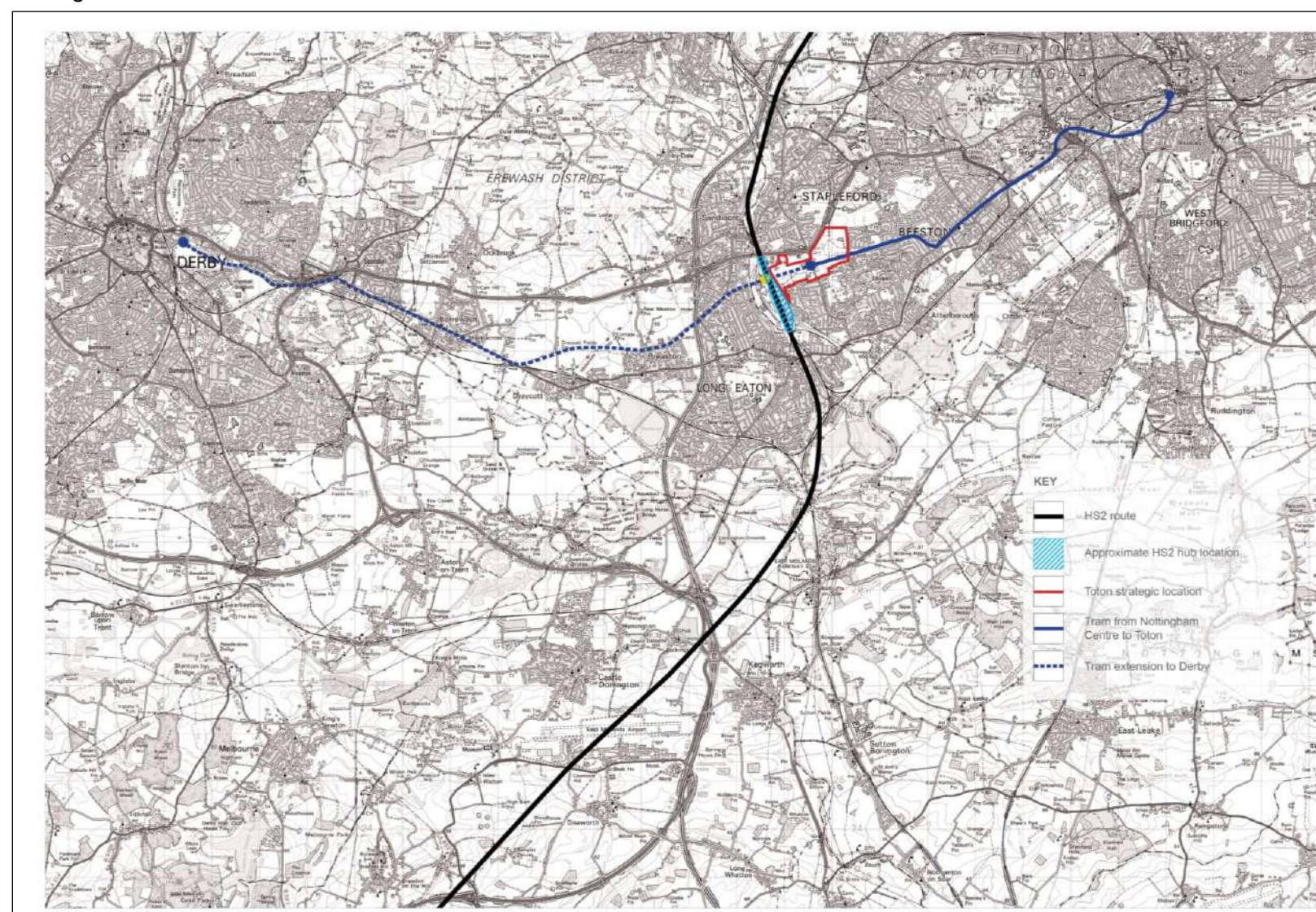
AN ALTERNATIVE APPROACH:

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

ENVIRONMENTAL IMPACT:

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

Strategic Location



AN ALTERNATIVE MASTERPLAN

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

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

MASTERPLAN FOR DISCUSSION – OPTION ONE

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



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Broxtowe Gateway
Toton

DEVELOPMENT FRAMEWORK PLAN

NTS@A1
13 October 2015 SRE / CH
5538-L-01 - Q



W:\p\5538\5538\PLANS\5538-L-13-E Aerial Montage.mxd

Broxtowe Gateway
Toton

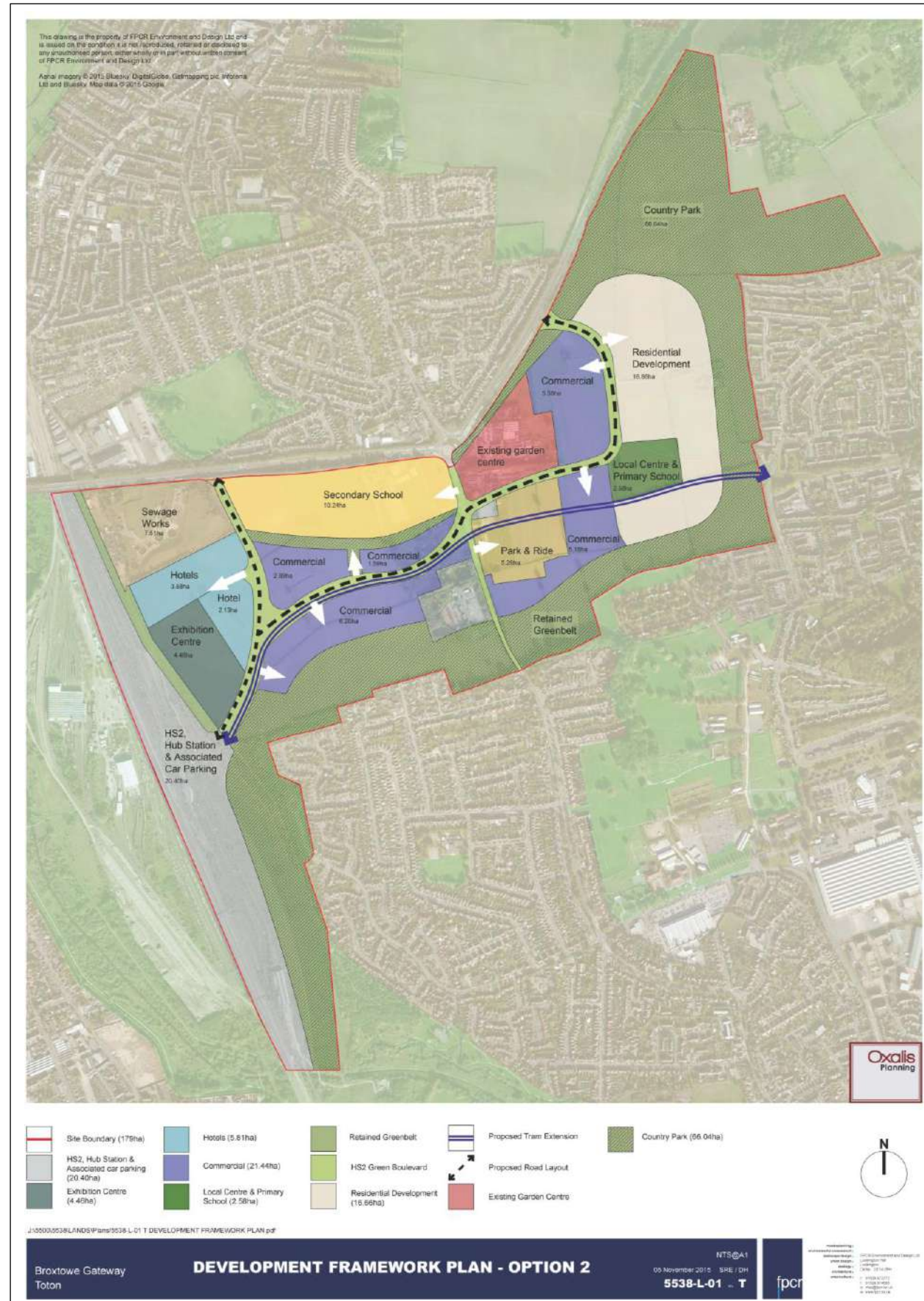
AERIAL VISUALISATION

NTS@A1
13 October 2015 SRE / CH
5538-L-13 - E



MASTERPLAN FOR DISCUSSION – OPTION TWO

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



Broxtowe Part 2 Local Plan



Broxtowe
Borough
COUNCIL

Agent

Please provide your client's name TAYLOR & BURROWS PROPERTY

Your Details

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

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

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

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

Please tick here ✓

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

For more information including an online response form please visit:

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		
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	Policy 24: The health impacts of development		
	Policy 25: Culture, Tourism and Sport		
	Policy 26: Travel Plans		
	Policy 27: Local Green Space		
	Policy 28: Green Infrastructure Assets		
	Policy 29: Cemetery Extensions		
	Policy 30: Landscape		
	Policy 31: Biodiversity Assets		
	Policy 32: Developer Contributions		
Policies Map			
Sustainability Appraisal			
Other (e.g. omission, evidence document etc.)			

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

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

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

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

Your comments

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

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

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

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

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

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

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

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

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

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

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

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

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

1. Positively Prepared: To meet the test the plan must be able to show it is based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, in a manner consistent with achieving sustainable development. The sites selected, and the many previously permitted, do not show a positive approach to achieve the delivery claimed within the next 5 years let alone the immense step change that the Trajectory in Table 4 is suggesting will occur. The Council appear to be relying on sites that have failed in the past which indicates that the Plan is not positively prepared.

2. Justified: The sites highlighted above are not fully evaluated and the belief that they will deliver in the manner suggested is not justified.

3. Effective: The fact that the issues raised above, that sites will not deliver as forecast, means that the Plan will fail to be effective and deliver the growth required.

4. Consistent with national policy: The NPPF (Para 14) requires local planning authorities should positively seek opportunities to meet the development needs of their area. It goes on to seek to “boost significantly the supply of housing” (para 47) . However, as this and other objections will show, that is not the approach the council is talking, relying instead on sites where deliverability is questionable.

Question 4: Modifications sought

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

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

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

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

Question 5: Public Examination Attendance

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

Yes, I wish to participate at the public examination

✓

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

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

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

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

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

Broxtowe Part 2 Local Plan



Broxtowe
Borough
COUNCIL

Agent

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

Your Details

Title	Mr	Mrs	Miss	<input checked="" type="radio"/> Ms	Other:
Name	CAROL ZLOTOWITZ				
Organisation (if responding on behalf of the organisation)	Broxtowe Borough Council Planning & Community Development				
Address					- 3 NOV 2017
Postcode					
Tel. Number					
E-mail address					

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

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

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

Please tick here ☐

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

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

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	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 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 think the local community all agree that these sites should be removed as plans for housing completely. The wishes of the people who live in this area should be considered and the ban on building should be permanent.

The fields off Cornwall Ave should now be designated as a Local Green Space.

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

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

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

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	<input checked="" type="checkbox"/>
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.

I feel this plan is unsound and this is why.

- 1) There is already a lot of house building going on around Plessey Bridge and the Boots site. This will already take its toll on infrastructure, traffic, environment and wildlife. Those few fields by the canal provide natural habitat, small green sites for children & walkers and a breathing space and a small lung of beauty for locals.
- 2) There are not many pockets of countryside left in and around Boston. They are essential for physical and mental health and provide natural areas for children and dogs to play.
- 3) It is of historic interest (there is an ancient path) and is greatly valued by locals.

Question 5: Public Examination Attendance

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

Yes, I wish to participate at the public examination

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



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

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

Guidance Note:

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

'Legally Compliant':

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

'Compliant with the Duty to Co-operate':

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

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

'Sound'

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

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

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

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

Broxtowe Part 2 Local Plan



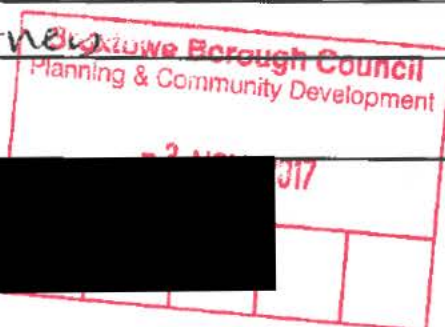
Broxtowe
Borough
COUNCIL

Agent

Please provide your client's name	
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Your Details

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



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Please tick here



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

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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.

Allocating the Cornwall Avenue field (coloured green on the plan) is 'not justified' as it is of greater value to the local community as a natural green space because of the following reasons:-

- * its a locally valued feature, being a small field of naturalised grass, surrounded by native hedgerows
- * it is essential to the character and amenity of Cornwall Avenue, being the focal point of this road.
- * its a haven for wildlife (including notable species) with grassland, native hedgerow + waterside habitats.
- * its of historic interest: field + adjacent canal are over 200yrs old / field contains remains of an ancient track.
- * its of recreational value to walkers / dog owners who use the field everyday, shown by the well-worn path.

Continued on extra sheet →

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 following modifications should be made to the Local Plan:-

- a) Cornwall Avenue field (with its surrounding hedgerows) should be removed from the Severn Trent housing site.
- b) Cornwall Avenue field (with its surrounding hedgerows) should be designated as 'Local Green Space'. This will make the Local Plan 'sound' as the field is of special value to the local community, as described previously.
- c) The adjacent field (coloured yellow on plan) should also be included in the 'Local Green Space'. This 2nd field is an equally valued local feature of grassland surrounded by mature hedgerows, as the 2 fields together form a half mile strip of 'countryside' between The Rylands and the ~~severn~~ ^{severn} site, stretching from the canal right up to Leyton Crescent. This is a locally important route for wildlife, and is a route enjoyed daily by walkers and dog owners throughout the year, as proved by the well-worn paths. The local value of this 2nd field has also been expressed repeatedly at Broxtowe C-A-T meetings.

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.**

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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'.
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EXTRA SHEET to Comments on Question ~~2~~ 3

- * Its part of a green corridor stretching from canal almost to Lilac Grove — important route for wildlife.
- * Its an easily accessible pocket of 'countryside' between Rylands and the new ^{Severn} ~~new~~ development.
- * its value to the community was demonstrated at Broxtowe July C.A.T. (Community Action Team) meeting, where local folk voted unanimously (48 votes) to keep this field and not build here (vote verified by Alrcullen).



Policy: 3.5 Severn Trent, Beeston

3.13 Located in the Main Built up Area of Nottingham, the site is located to the south east of Beeston Town Centre and is situated directly adjacent to the Strategic Core Strategy allocation of Boots (to the east) in-between the Beeston Canal (to the south), the railway line (to the north) and the existing residential area of Beeston Rylands to the west. The site is brownfield and has previously been used as a sewage treatment works by Severn Trent Water.

3.14 The following key development requirements must be met.

Key Development Requirements:

- 150 homes to be located towards the north of the site
- Provide soft landscaping and minimise external lighting along the canal side boundary
- Provide enhanced Green Infrastructure corridors linking urban areas of Beeston to the north and west with the canal side towpath
- Provide pedestrian bridge to link to the canal side towpath
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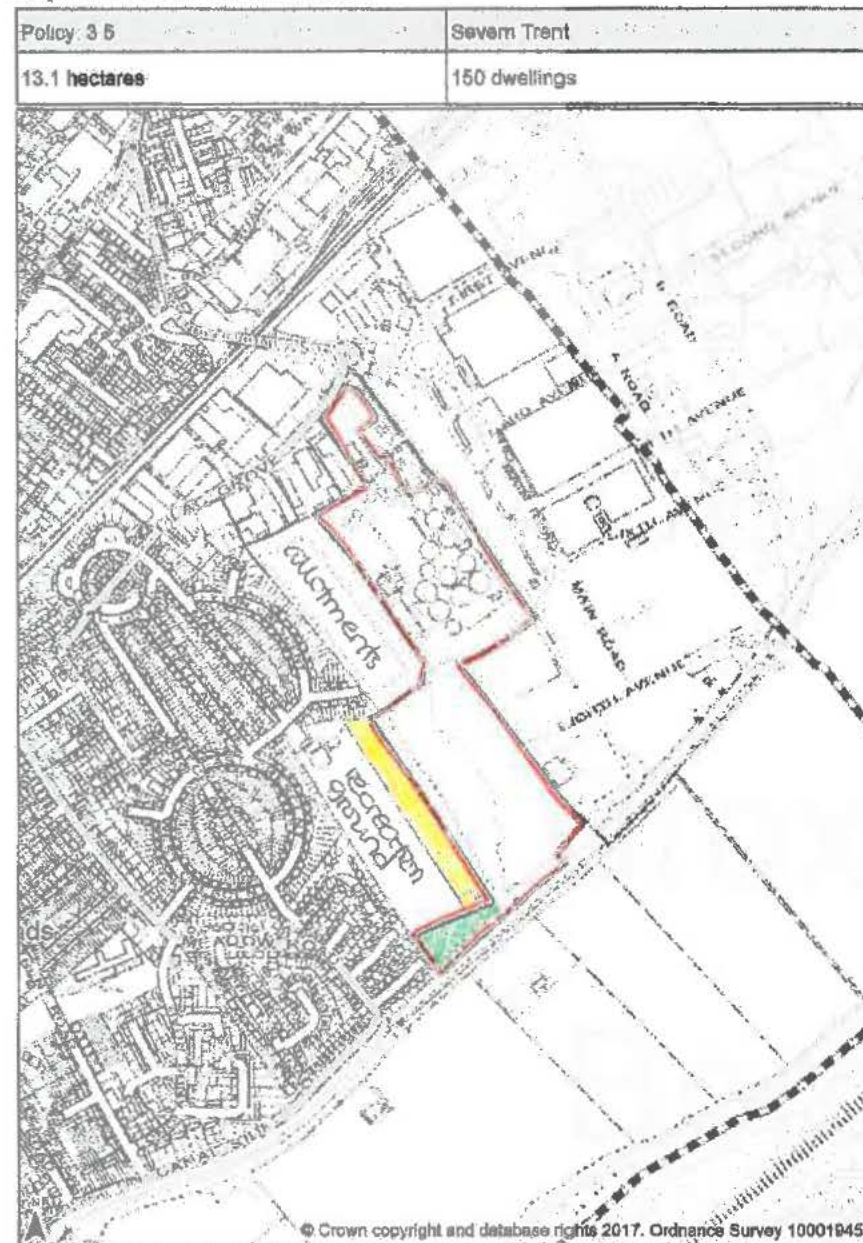
Key Development Aspirations;

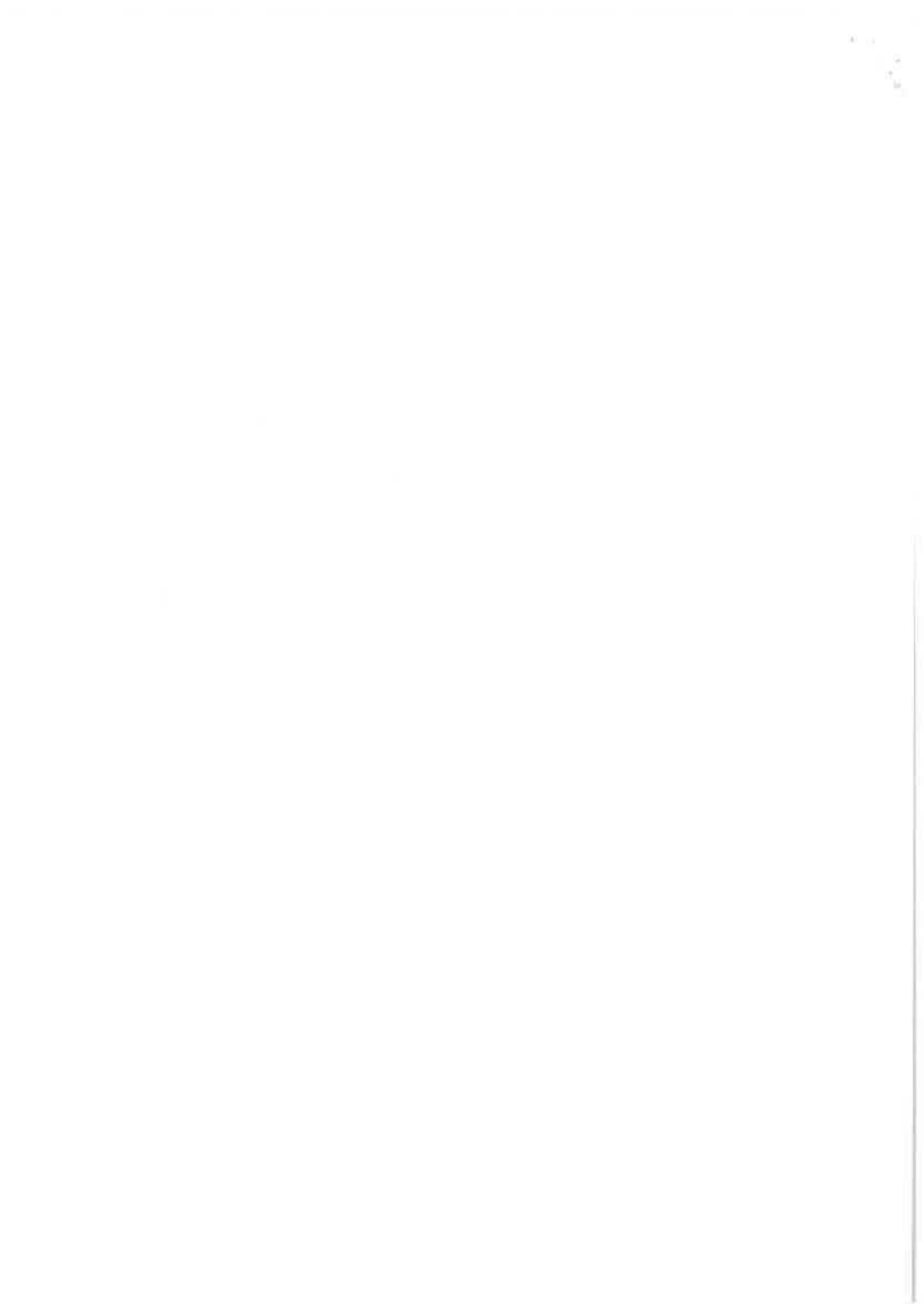
1. Mitigate highways impact on the wider road network to ensure that congestion is not made worse than currently exists.

What the Sustainability Appraisal says

3.15 This allocation has significant housing, health, transport and innovation (due to the Enterprise Zone) objectives benefits; and only minor negative effect on the biodiversity and green infrastructure objective due to the adjoining Beeston Canal Local Wildlife Site.

Map 12: Severn Trent Beeston





Broxtowe Part 2 Local Plan



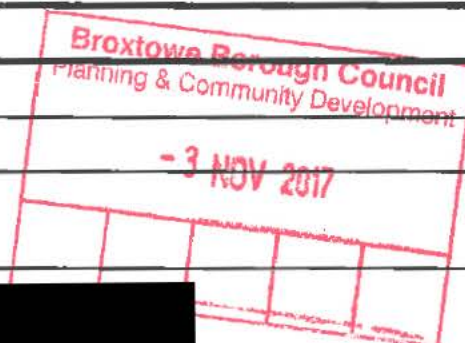
Broxtowe
Borough
COUNCIL

Agent

Please provide your client's name	N/A
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Your Details

Title MRS	Mr	Mrs	Miss	Ms	Other:
Name	BARBARA GILLIES				
Organisation (if responding on behalf of the organisation)	N/A				
Address	[REDACTED]				
Postcode	[REDACTED]				
Tel. Number	[REDACTED]				
E-mail address	[REDACTED]				



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

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Please tick here

☐

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	Policy 27: Local Green Space	138 & 39	325313-315
	Policy 28: Green Infrastructure Assets		
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Question 3: Why is the Local Plan unsound? Please only answer this question if you answered 'No' to 2.3 above

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It's a locally valued feature of naturalised grassland surrounded by mature hedgerows. It's essential to the character and amenity of Cornwall Avenue. being the focal point of this road. It's of historic interest, field and adjacent canal are over 200 years old and field contains remains of ancient track. It's a haven for wildlife with grassland mature hedgerows and waterside habitats. It's an easily accessible pocket of countryside between Rylands and the proposed Severn Trent developments

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a. Cornwall Avenue field (with its surrounding hedgerow) should be designated as 'Local Green Space' on the Local Plan. This would be justified as the field is of special value to the local community.

b. Cornwall Ave field should be removed from Severn Trent housing site.

c. The Local Green Space should also include the adjacent field, coloured yellow on the plan. This second field is an equally valued local feature.

The two fields together form a half mile strip of countryside between the Rylands and the Severn Trent site, stretching from Cornwall Avenue and the Canal up to Leyton Crescent. This is a valuable route for wildlife, and is a route enjoyed daily by walkers and dog owners throughout the year, as proved by the well-worn paths. The local value of this second field has also been expressed repeatedly at Broxtown C.A.T. meetings. Designation as Local Green Space is justified by its value locally.

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✓

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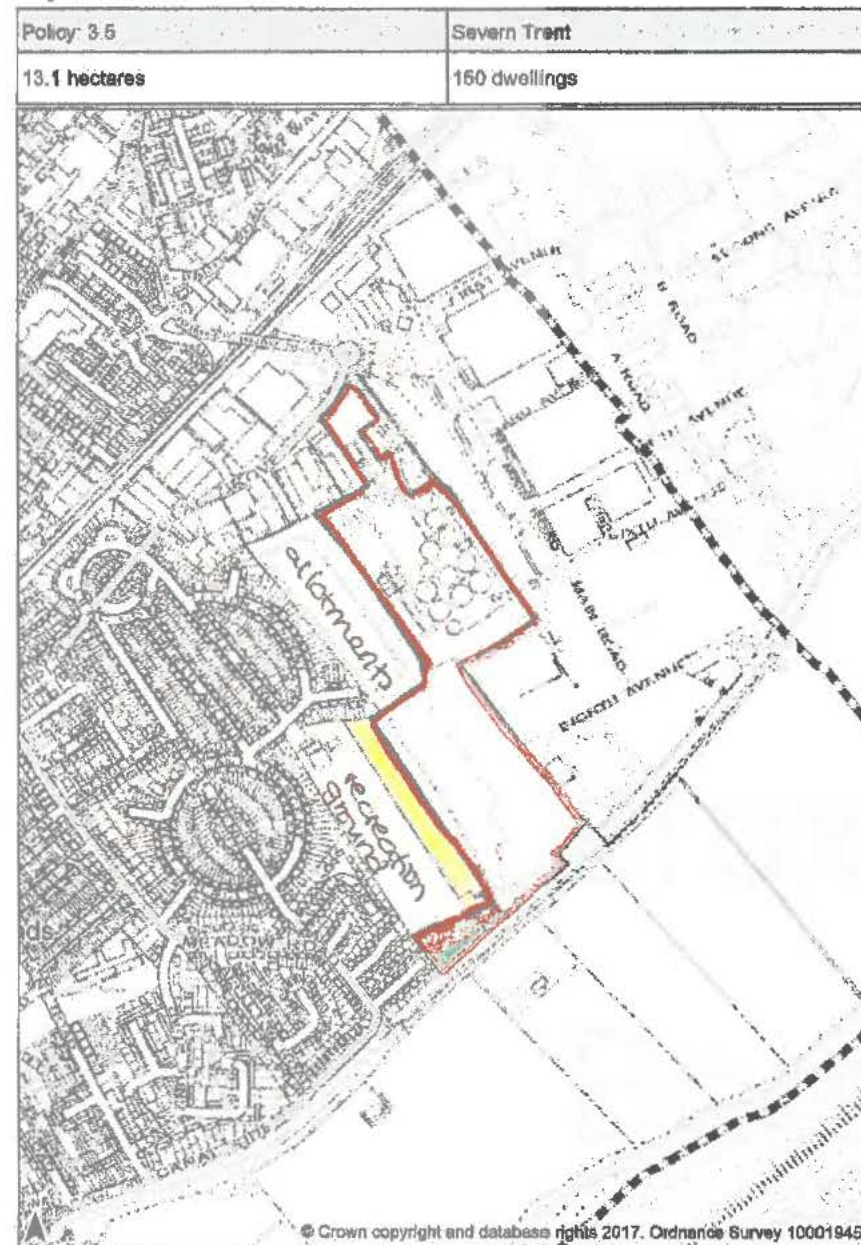
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Map 12: Severn Trent Beeston



2000

Broxtowe Part 2 Local Plan



Broxtowe
Borough
COUNCIL

Agent

Please provide your client's name	
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Your Details

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

Broxtowe Borough Council
Planning & Community Development

- 3 NOV 2017

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WHY THE LOCAL PLAN IS NOT SOUND

Including field A (see attached plan) in a housing site is not justified because

- It shouldn't be treated as a 'brownfield' and prioritised for development
- It is of special value to the local community as a natural green space.

Building housing on field A would make the Local Plan ineffective as building here would be inconsistent with several Local Plan policies.

Building housing on Field A would be inconsistent with National Policy as it would not comply with NPPF paras 76-79

* Please see attached sheet for details.*

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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'**.

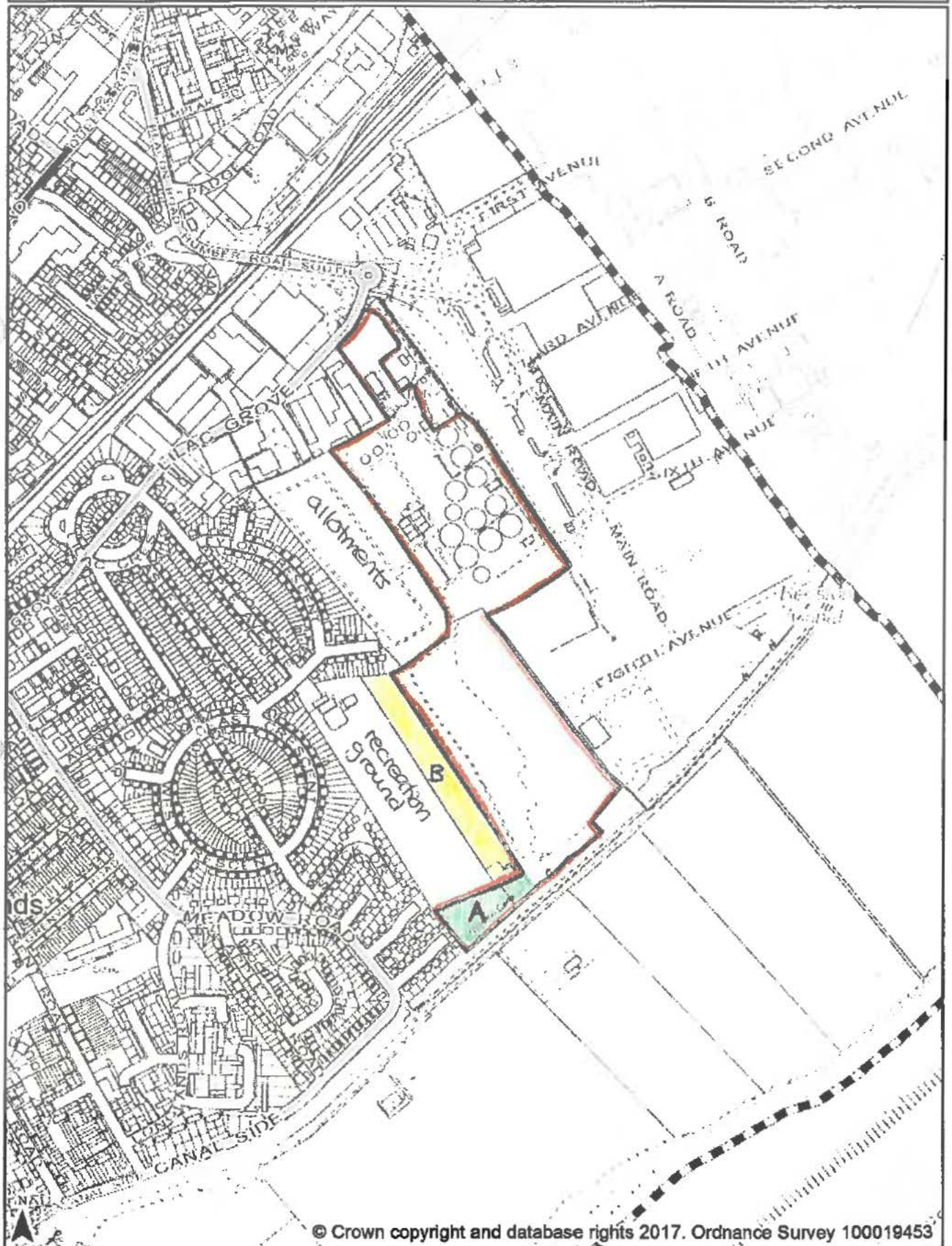
To meet the 'Test of Soundness', the independent Planning Inspector is required to consider whether or not our Local Plan is **'justified'**, **'effective'**, has been **'positively prepared'**, and is **'consistent with national policy'**. You may wish to consider the following before making a representation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

Map 12: Severn Trent Beeston

Policy: 3.5	Severn Trent
13.1 hectares	150 dwellings



100



REF: FIELDS A & B ON THE ATTACHED PLAN

INCLUDING FIELD A IN AN AREA ALLOCATED FOR HOUSING IS NOT JUSTIFIED BECAUSE :

FIELD A SHOULD NOT BE CLASSED AS BROWNFIELD WHICH PRIORITISES IT FOR DEVELOPMENT -

1) **It is essentially a 'green field' site**, so should not be prioritised for development. It is only classed as brownfield as it is part of the land owned by Severn Trent -The Severn Trent site is brownfield as most of it is a former sewage plant, so is prioritised for housing in order to re-use previously developed land. Field A, however, has not been part of the sewage works; it just has the misfortune of being a small adjacent field owned by Severn Trent. It was grazed from the 17th century until about 9 yrs ago, and is now re-naturalising grassland. Classing it as brownfield is not, therefore, justified or reasonable.

FIELD A IS OF SPECIAL VALUE TO THE LOCAL COMMUNITY AS A NATURAL GREEN SPACE -

- 1) **It is a locally valued feature** It is a well-loved green space; Almost 1.5 acres of renaturalised grassland enclosed by mature hedgerows, a copse (at its east end), bordered by the canal, & with access to the adjacent recreation ground and field beyond for walks.
- 2) **It is essential to the unique character and amenity of Cornwall Ave** being the main focal point & feature of this road.
- 3) **It is of recreational value** being very well used, as seen by the well-worn tracks created over many years; people are seen in this field nearly every hour of every day throughout the year, walking, picking blackberries, enjoying the pocket of countryside and its wildlife. It is a social place where people often meet. It is part of a daily route used by numerous dog walkers, on route to the rec. and field B.
- 4) **It is of local historic interest** The field is over 200 years old – cut off from the land to the south when the canal was built in the late 1700's. The result is this small enclosed field (uncommon these days). The remains of an ancient cart track on an embankment, runs along its northern edge, thought to have led to Wilford before the canal was built. The historic canal bounds its southern edge.
- 5) **It is a little haven for wildlife** between the Rylands and the proposed Severn Trent housing site. It comprises grassland, mature hedgerows, copse, and waterside habitats. A number of wildlife species seen here are listed as of 'conservation concern' in the Nottinghamshire Biodiversity Action Plan (old lady moth, green woodpecker, tits, goldfinches, mallard, sand martins, sparrow hawk, frogs and bats to name a few which are listed.) The rare Small Ranunculus moth (surprisingly not listed in NBAP) has also been recorded here by members of Derbyshire and Nottinghamshire Entomological Society.
- 6) **The field forms a valuable part of a green corridor** stretching for almost half a mile from the canal / river corridor up to Lilac grove, including recreation ground, field B abutting the NE side of the rec, hedgerows, gardens, and allotments – a truly multi-functional green corridor, as favoured by Broxtowe's Core Strategy Policy 16, being beneficial to movement of wildlife.
- 7) **It is of value as an accessible little pocket of countryside** in the heart of the local community, between the recreation ground, Cornwall Ave, and the Severn Trent housing site. Pol 16 justification 3.16.6 says: One of the key issues that has been identified through the development of the Aligned Core Strategies is the poor access for many residents into the surrounding countryside. Improving access into the countryside and to other Green Infrastructure assets will encourage a healthy lifestyle and contribute to health improvement through increasing physical activity and improving mental wellbeing.
- 8) **It has educational value** where children can experience & learn about nature in a small, safe, accessible parcel of 'countryside'.
- 9) **It creates (together with field B) a pleasant rural setting for the recreation ground** rather than it being surrounded by houses.
- 10) **The value of this field to the local community was demonstrated** at Broxtowe's July C.A.T. (Community Action Team) meeting, where local folk voted unanimously (48 votes) to keep this field and not build here (recorded by Councillor Teresa Cullen). Its value to the community is also demonstrated by the well-worn paths that cross it showing how well it is used.

BUILDING ON FIELD A WOULD MAKE THE CORE STRATEGY & LOCAL PLAN INEFFECTIVE BECAUSE:

- 1) **It would be contrary to Core Strategy Policy 17.1 b)** which says that biodiversity will be increased over the plan period by ensuring that fragmentation of the Green Infrastructure network is avoided. Building on field A, however, would fragment the green corridor which currently stretches from the canal almost to Lilac Grove, by cutting it off from the strategic Trent valley corridor.
- 2) **It would be contrary to Core Strategy Policy 10.1(c)**: This policy says that all new development should be designed to reinforce valued local characteristics. By building housing on Field A, however, it would be destroying a valued local characteristic.
- 3) **It would be contrary to Local Plan policy 17** This policy says that development should not cause unacceptable loss of amenity for occupiers of neighbouring properties. Developing Field A, however, would destroy this amenity for nearby properties.

BUILDING ON FIELD A WOULD NOT BE CONSISTENT WITH NATIONAL POLICY BECAUSE:

- 1) **It would be contrary to NPPF para 76-8** This says that "Local communities through local and neighbourhood plans should be able to identify for special protection green areas of particular importance to them" (which the Cornwall Avenue field A is).

REF: FIELDS A & B ON ATTACHED PLAN

THE FOLLOWING MODIFICATIONS WOULD MAKE THE LOCAL PLAN SOUND:

1) Field A (Cornwall Avenue field) should be removed from the site allocated for housing

Field A, with its borders of hedgerows, and the copse at its east end, should be removed from Severn Trent housing site.

2) Field A should be designated in the Local Plan as 'Local Green Space'

Field A, including its surrounding hedgerows, and the copse at its east end, should be protected as 'Local Green Space', in accordance with Local Plan Policy 27.1 (and NPPF paras 76-8). It meets the criteria for 'Local Green Space' as the field is a small site, in close proximity to the community, and has been demonstrated as being of special value to the local community. It is of value in terms of recreation, amenity, wildlife, and historic interest, accessibility, and educationally, as described previously in Question 3: Comments section.

3) Field B should be added to the 'Local Green Space'

Field B, including its borders of trees and hedgerows, should also be designated and maintained as 'Local Green Space'. It is adjacent to Field A, and the 2 fields are linked. They are fondly known locally as the old horsefields.

Field B meets the criteria for 'Local Green Space', as follows:

- It is a small area, of about 2.5 acres
- It is of historic value, being an old field, well over 200 years old, and surrounded by mature hedgerows.
- It enhances the wildlife value of Field A by providing a corridor of 'countryside' – grassland, scrub, mature hedgerows and trees – stretching from Field A right up to Leyton Crescent and the allotments
- It enhances the recreation value of Field A; the 2 fields together provide almost a half mile 'rural' walk from Cornwall Ave and the canal up to Leyton Crescent. This is a much used and valued route for locals and especially for many dog-walkers, who use this route on a daily basis throughout the year.
- Its value to the local community has been repeatedly demonstrated at Broxtowe's C.A.T. meetings, most recently in April this year, where residents voiced their concern to the Council's planning officer that this field should remain as a natural green space. This field's value is also demonstrated by the well-worn paths throughout its length.
- It forms a very accessible strip of 'countryside' between the Rylands and the proposed Severn Trent housing site. There is a real sense of 'countryside' here – It is enclosed by hedgerows, and the view from its northern end (looking back down the field) is of uninterrupted countryside extending for 1km to the wooded hillside of Clifton Grove, at the far side of the Trent valley (see attached photo).
- It is an important element of a multi-functional green corridor comprising Fields A and B, the recreation ground, the hedgerows, gardens and allotments (as favoured by Core Strategy Policy 16)

4) The recreation ground could be combined with the 'Local Green Space' –

The combination of formal and natural green space here (the rec. together with fields A and B) is a real asset, the whole of which is well used and valued locally. It would be good to protect this as a whole for the future. The recreation ground also forms part of the green corridor here (as described earlier) which is of value for wildlife as well as for the community.

THESE MODIFICATIONS WOULD MAKE THE LOCAL PLAN SOUND BECAUSE:

The Local Plan will be justified in designating fields A and B (and the recreation ground) as Local Green Space, as they are of very special value to our local community, and this would protect them for the future.

The Local Plan will be effective as it will comply with

- Core Strategy Policy 17.1b : the green corridor will not be fragmented and this will be beneficial to biodiversity.
- Core Strategy Policy 10.1(c) : a valued local characteristic will be protected.
- Local Plan Policy 17 : there will be no loss of amenity for our neighbourhood.

The Local Plan will be consistent with national policy as it will comply with the NPPF (National Planning Policy Framework paras 76-8), by designating as Local Green Space, a green area of particular importance to this local community.

Field A, Field B and
recreation ground
referred to on my form



FIELD A



View from Cornwall Ave.
Essential to the character and amenity
of our road



view back to Cornwall Avenue



Ancient cart track on embankment



waterside habitat
by the canal



wellworn path
linking Field A
and Field B

FIELD B



↑
View down full length of field is of uninterrupted countryside extending for 1 km to wooded hillside in distance. Gives a real sense of countryside here even though you are only a few yards from the recreation ground. Very Accessible countryside for the local community.



many local folk enjoy walking here.



Well worn paths through Field B showing they are well used in all seasons.

6960

Broxtowe Part 2 Local Plan



Broxtowe
Borough
COUNCIL

Agent

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

Your Details

Title	<input checked="" type="radio"/> Mr <input type="radio"/> Mrs <input type="radio"/> Miss <input type="radio"/> Ms <input type="radio"/> Other:
Name	NICHOLAS GROVES
Organisation (If responding on behalf of the organisation)	
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>



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

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

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

Please tick here ☐

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

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

www.broxtowe.gov.uk/part2localplan

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

Please return completed forms to:

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

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

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

Document	Policy number	Page number	Policy text/ Paragraph number
Part 2 Local Plan	Policy 1: Flood Risk		
	Policy 2: Site Allocations		
	Policy 3: Main Built up Area Site Allocations	38, 39	
	Policy 4: Awsworth Site Allocation		3.13 - 3.15
	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	154	All PARA.
	Policy 28: Green Infrastructure Assets		
	Policy 29: Cemetery Extensions		
	Policy 30: Landscape		
	Policy 31: Biodiversity Assets		
	Policy 32: Developer Contributions		
Policies Map	12		
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.

1) INCLUDING THE CORNHILL AVENUE FIELD (COLOURED GREEN ON THE PLAN) IN A HOUSING SITE IS NOT JUSTIFIED AS IT IS OF MUCH CREATOR VALUE TO THE LOCAL COMMUNITY AS A NATURAL GREEN SPACE, FOR THE FOLLOWING REASONS:
 a) A LOCAL VALUED FEATURE. b) OF RECREATIONAL VALUE TO WALKERS/DOG OWNERS WHO USE THE FIELD EVERY DAY. c) HAVEN TO WILDLIFE d) PART OF A GREEN CORRIDOR STRETCHING FROM THE CANAL TO ALMOST LILAC GROVE. e) EASILY ACCESSIBLE "POCKET OF COUNTRYSIDE" BETWEEN RILANDS AND THE PROPOSED SEVENTON TREST DEVELOPMENT. f) EDUCATIONAL VALUE FOR LEARNING ABOUT NATURE g) ITS VALUE TO THE COMMUNITY WAS DEMONSTRATED AT BROXTONE'S JULY CAT MEETING WHERE LOCAL PEOPLE VOTED UNANIMOUSLY (48 VOTES) TO KEEP THIS FIELD AND NOT BUILD HERE (VOTE WAS 100% BY COUNCILWORK ELLER).

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 FOLLOWING MODIFICATIONS SHOULD BE MADE TO THE LOCAL PLAN:

- A] CORNWALL AVENUE FIELD (WITH ITS SURROUNDING WOODGROVES SHOULD BE REMOVED FROM THE SEVERN TREAT HOUSING SITE.
- B] CORNWALL AVENUE FIELD (WITH ITS SURROUNDING WOODGROVES SHOULD BE DESIGNATED "AS A LOCAL GREEN SPACE" ON THE LOCAL PLAN. THIS WOULD BE JUSTIFIED AS THE FIELD IS OF SPECIAL VALUE TO THE LOCAL COMMUNITY.
- C] "THE LOCAL GREEN SPACE" SHOULD ALSO INCLUDE THE ADJACENT FIELD (COLOURED YELLOW ON THE ATTACHED PLAN) A $2\frac{1}{2}$ ACRE STRIP OF GRASS AND SHRUB SURROUNDED BY MATURE WOODGROVES. THIS 2ND FIELD IS AN EQUALLY VALUED LOCAL FEATURE. THE 2 FIELDS TOGETHER FORM A $\frac{1}{2}$ MILE STRIP OF "COUNTRYSIDE BETWEEN THE RYLANDS AND THE SEVERN TREAT SITE. THIS IS A VALUABLE ROUTE FOR WILDLIFE AND IS A ROUTE ENJOYED BY WALKERS AND DOG OWNERS. THE LOCAL VALUE OF THIS 2ND FIELD HAS ALSO BEEN EXPRESSED REPEATEDLY AT BROTHWELL'S CPT MEETINGS.

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

Question 5: Public Examination Attendance

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

Yes, I wish to participate at the public examination

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

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

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

Guidance Note:

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

'Legally Compliant':

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

'Compliant with the Duty to Co-operate':

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

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

'Sound'

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

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

- '**Justified**': This means that the Local Plan is based upon a robust and credible evidence base. If you think that the evidence doesn't support the choice made in our Local Plan, or there are realistic alternatives, then your comments may relate to whether or not it is 'justified'.
- '**Effective**': This means that the Local Plan will deliver what it sets out to. If you think that what we are proposing in the Local Plan is not deliverable, then your comments may relate to whether or not our Local Plan is 'effective'.
- '**Positively Prepared**': This means the Local Plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.
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For further guidance or assistance, please contact the **Planning Policy Team** on **0115 917 3452** or by emailing **policy@broxtowe.gov.uk**.

Policy: 3.5 Severn Trent, Beeston

3.13 Located in the Main Built up Area of Nottingham, the site is located to the south east of Beeston Town Centre and is situated directly adjacent to the Strategic Core Strategy allocation of Boots (to the east) in-between the Beeston Canal (to the south), the railway line (to the north) and the existing residential area of Beeston Rylands to the west. The site is brownfield and has previously been used as a sewage treatment works by Severn Trent Water.

3.14 The following key development requirements must be met.

Key Development Requirements:

- 150 homes to be located towards the north of the site
- Provide soft landscaping and minimise external lighting along the canal side boundary
- Provide enhanced Green Infrastructure corridors linking urban areas of Beeston to the north and west with the canal side towpath.
- Provide pedestrian bridge to link to the canal side towpath
- Vehicle access to only be at the north of the site onto Lilac Grove

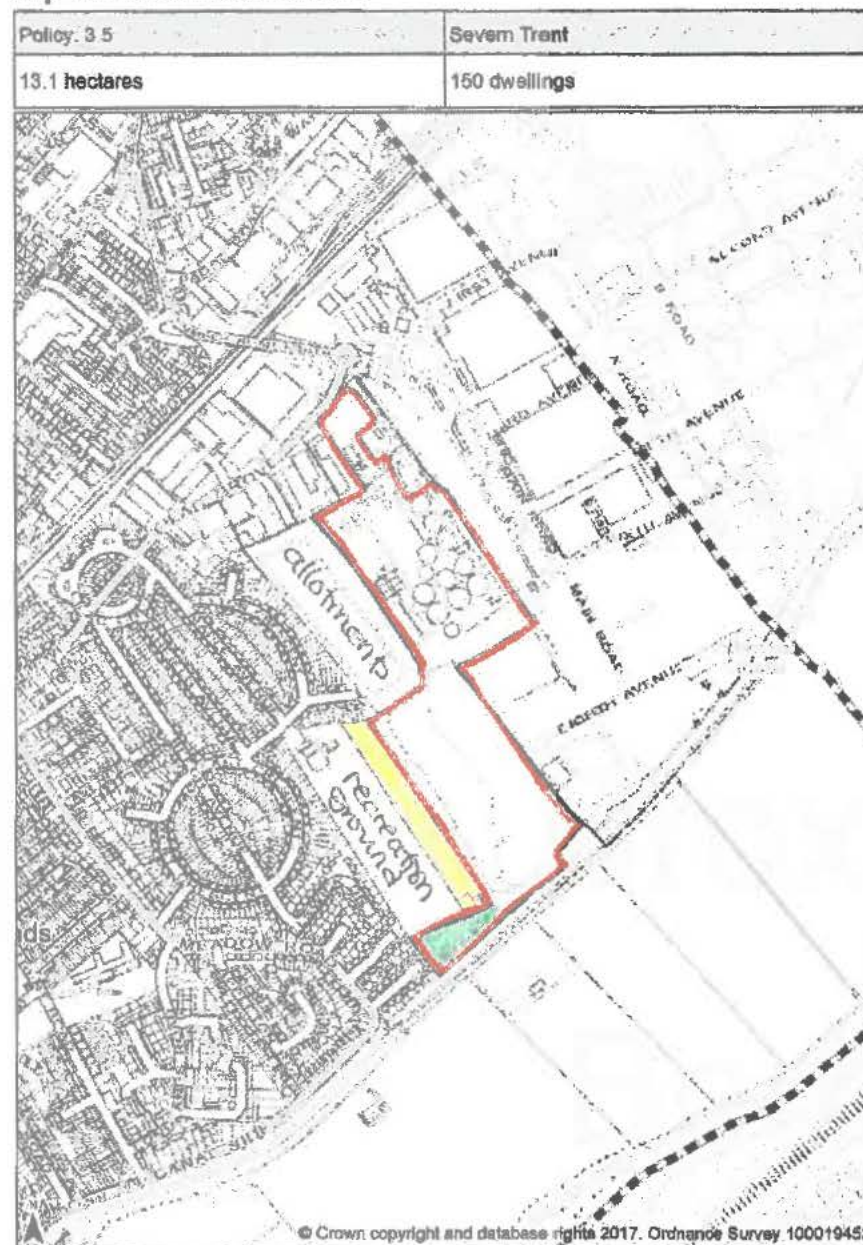
Key Development Aspirations;

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

3.15 This allocation has significant housing, health, transport and innovation (due to the Enterprise Zone) objectives benefits; and only minor negative effect on the biodiversity and green infrastructure objective due to the adjoining Beeston Canal Local Wildlife Site.

Map 12: Severn Trent Beeston



Broxtowe Part 2 Local Plan



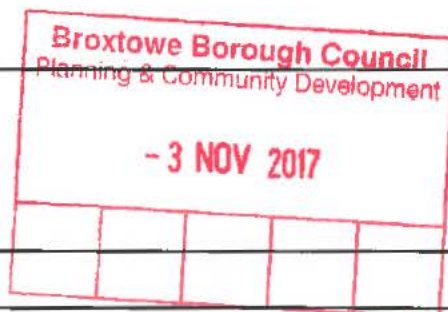
Broxtowe
Borough
COUNCIL

Agent

Please provide your client's name

Your Details

Title	Mr	Mrs	<u>Miss</u>	Ms	Other:
Name	ANDIE SHAW				
Organisation (if responding on behalf of the organisation)					
Address					
Postcode					
Tel. Number					
E-mail address					



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

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

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

Please tick here

☐

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

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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		<input checked="" type="checkbox"/>

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	<input checked="" type="checkbox"/>
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.

Including the Cornwall avenue field in a housing site is 'not justified' as it is of much greater value to the local community as a natural green space

- I myself walk my dog there every day - as do many others.
- It's a haven for wildlife with grassland, mature hedgerows & waterside habitats
- Its value to the community was demonstrated a Broxtones CAT meeting where local voted unanimously to keep the field + not build there.

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.

- a) Cornwall Ave. field removed from seven trent housing site (green on map)
 - b) Cornwall Ave. field should be designated as local green space
 - c) The local green space should also include the adjacent field - a 2.5 acre strip of grass & shrub surrounded by hedgerows. The 2 fields together form a half mile strip of countryside between Kylands + Seven trent site and are a valuable route for wildlife, walkers and dog walkers. This fields importance was also expressed at the CAT meetings. (yellow on map)
- Designation as 'Local green space' is therefore justified by its special value to the community.

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.**

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

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Policy: 3.5 Severn Trent, Beeston

3.13 Located in the Main Built up Area of Nottingham, the site is located to the south east of Beeston Town Centre and is situated directly adjacent to the Strategic Core Strategy allocation of Boots (to the east) in-between the Beeston Canal (to the south), the railway line (to the north) and the existing residential area of Beeston Rylands to the west. The site is brownfield and has previously been used as a sewage treatment works by Severn Trent Water.

3.14 The following key development requirements must be met.

Key Development Requirements:

- 150 homes to be located towards the north of the site
- Provide soft landscaping and minimise external lighting along the canal side boundary
- Provide enhanced Green Infrastructure corridors linking urban areas of Beeston to the north and west with the canal side towpath
- Provide pedestrian bridge to link to the canal side towpath
- Vehicle access to only be at the north of the site onto Lido Grove

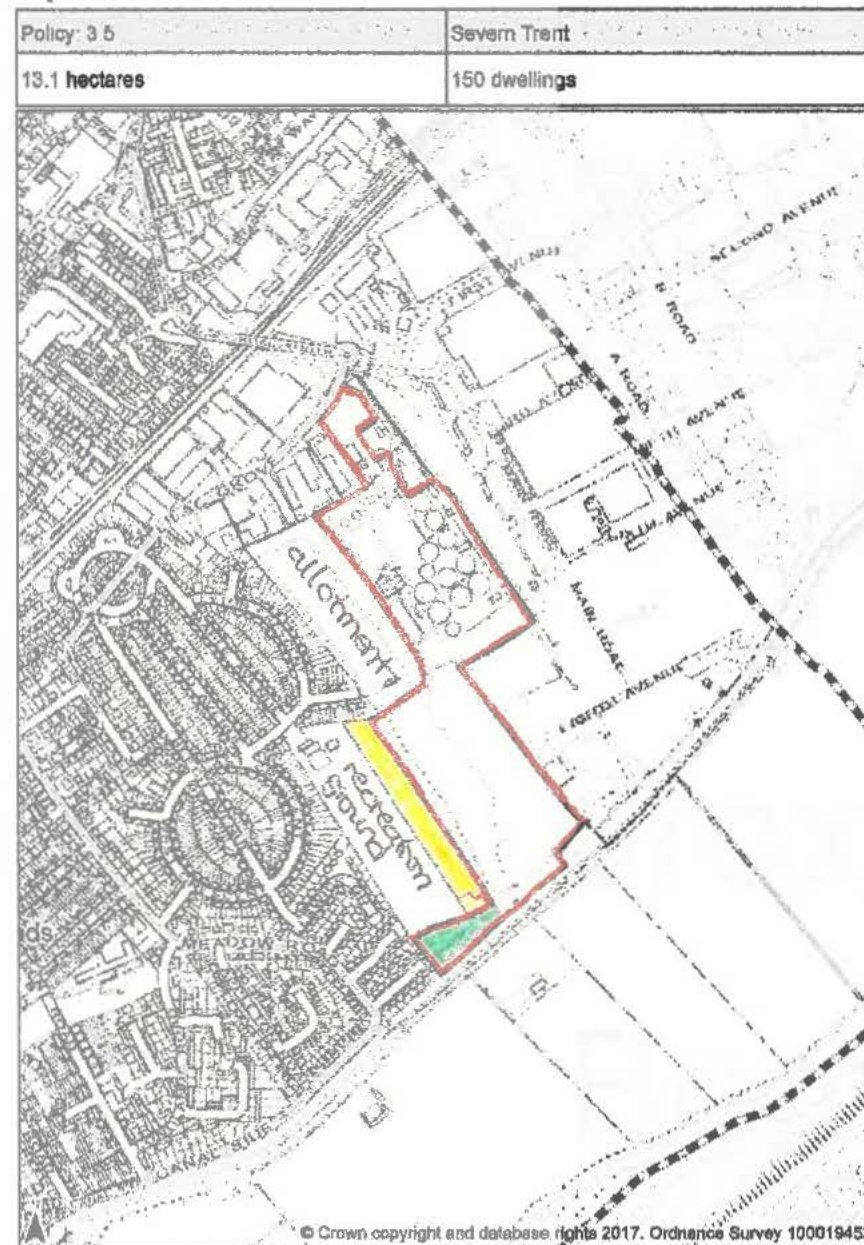
Key Development Aspirations;

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

3.15 This allocation has significant housing, health, transport and innovation (due to the Enterprise Zone) objectives benefits; and only minor negative effect on the biodiversity and green infrastructure objective due to the adjoining Beeston Canal Local Wildlife Site.

Map 12: Severn Trent Beeston



Broxtowe Part 2 Local Plan



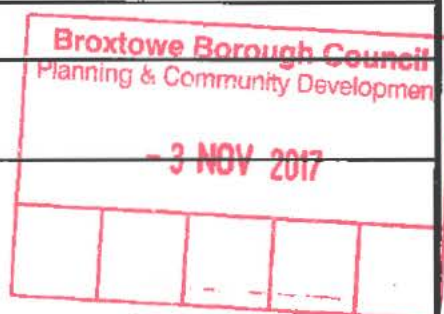
Broxtowe
Borough
COUNCIL

Agent

Please provide your client's name

Your Details

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



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

Please tick here



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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		<input checked="" type="checkbox"/>

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	<input checked="" type="checkbox"/>
It is not effective	
It is not positively prepared	
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Your comments

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

I feel that the Cornwall Avenue field is of much greater value to the community as a much loved natural green space than as an area for housing, it is a small field surrounded by established, natural hedge rows making it a haven for wildlife, it is well used by walkers and nature lovers/dog walkers everyday + is kept free from rubbish and litter etc, it is highly valued by the local community and is especially loved by the residents of Cornwall Avenue, the character of the field and its importance to the birds/wildlife + insects must be kept for not just our generation but for future generations too, the field is over 200 years old and is of historical interest in the fact that it contains the remains of an ancient track as well as being next to the canal, this field provides a very important, well used and much enjoyed stretch of countryside between the canal and Lilac Grove - making it an area enjoyed by all ages of the community. Losing this field would be devastating to the local area, notable species of wildlife/habitats, would be lost, the movement of wildlife would be gone, the focal point of Cornwall Avenue in particular would be gone, plus the enjoyment of walkers/dog walkers would be gone forever, local people have voted unanimously to keep this field as it is so

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 would definitely like to ask that the Cornwall Avenue field and its surrounding hedgerows be removed from the Severn Trent Housing site + plans,

I would plead with you to designate the Cornwall Avenue field and its surrounding hedgerows as "Local Green Space", it really does meet all the criteria for "Local Green Space" in view of its value to the local Rylands and Beeston Community,

I would also ask that the adjacent field - the one coloured yellow on the ~~attached~~ plan - also be included as "Local Green Space" as this 2nd field is an important local feature of grassland surrounded by natural, mature hedgerows. These 2 fields give us a strip of countryside enjoyed hugely by walkers/dog walkers + wildlife on a daily basis. The well worn paths on the fields clearly demonstrate how much these fields are used and enjoyed. This strip of countryside cannot + should not be destroyed for ever. I have lived on Cornwall Avenue + previously Beeston for nearly 50 yrs and cannot imagine that field (both fields) being destroyed - it is simply heartbreaking + devastating to even think of it going. us local folk have repeatedly voted to keep these fields as natural, green space so please do so.

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Yes, I wish to participate at the public examination

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Broxtowe Part 2 Local Plan



Broxtowe
Borough
COUNCIL

Agent

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

Your Details

Title	Mr Mrs <u>Miss</u> Ms Other:
Name	YVETTE GIBBERD
Organisation (If responding on behalf of the organisation)	
Address	[Redacted] [Redacted] [Redacted]
Postcode	[Redacted]
Tel. Number	[Redacted]
E-mail address	[Redacted]



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Its of recreational value to walkers and dog-owners who regularly use the field as seen by the well worn paths.

Its a haven for wildlife including notable species with several habitats including grassland, hedgerow and waterside.

It forms part of the green corridor linking Lilac Grove to the canal via the allotments, as an important route for wildlife.

Its an easily accessible pocket of countryside, making the Rylands and the new Boots development feel more rural.

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Cornwall Avenue field, with its surrounding hedgerows, should be removed from the Severn Trent housing site.

Cornwall Avenue ~~the~~ field, with its surrounding hedgerows, should be designated as local green space.

The adjacent field, yellow on attached plan, should be included in the local green space. This second field is an equally valued local feature of grassland surrounded by mature hedgerows, as the two fields together form a half mile strip of countryside between the Rylands and the Boots site, stretching from the canal to Leyton Crescent.

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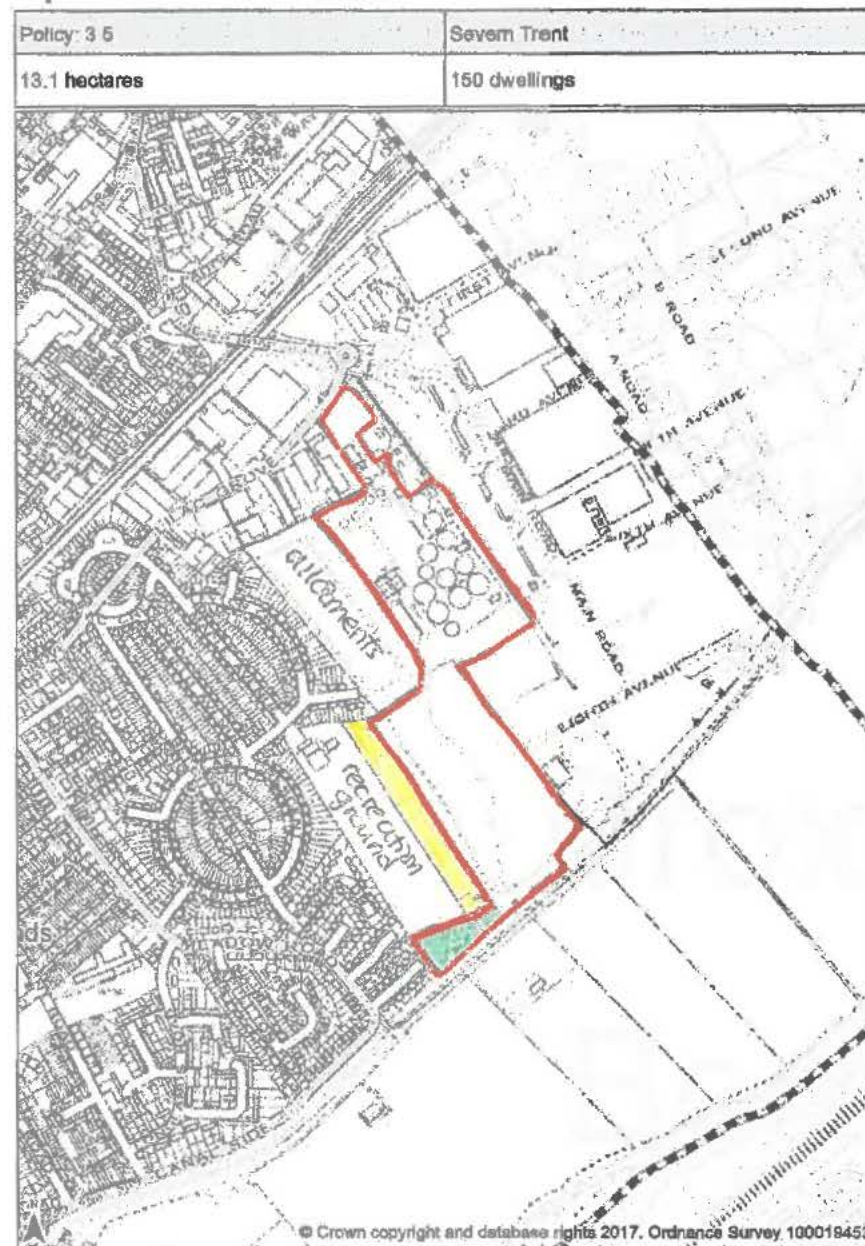
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What the Sustainability Appraisal says

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Map 12: Severn Trent Beeston



Broxtowe Part 2 Local Plan



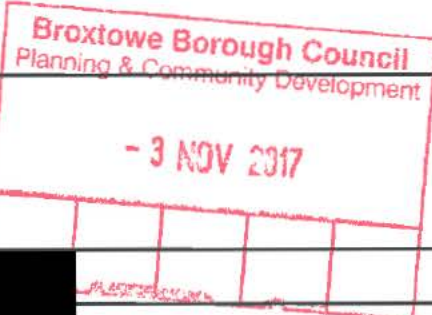
Broxtowe
Borough
COUNCIL

Agent

Please provide your client's name

Your Details

Title	Mr	Mrs	Miss	Ms	Other: MISS
Name	JULIE MANSELL				
Organisation (if responding on behalf of the organisation)					
Address					
Postcode					
Tel. Number					
E-mail address					



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I believe that the Local Plan is not 'justified' to include the COENWAIN AVENUE field in the housing site as it is of such importance to us as a natural green space. It is a beautiful small area beside the canal of historic interest (over 200 years old), which is valued by the local residents as a quiet natural space full of nature and wildlife. It is well used by the local kids by walkers and dog owners. It is a place for fun or for quiet contemplation, away from the local streets and houses. It is full of wildlife and natural habitat for birds, and other wildlife. It is a place to watch the ducks and swans swim by or watch a narrow boat pass through. It is a space to keep us sane and to give our community a sense of wellbeing. It is so important to us.

Please use a separate sheet of paper if required. Please use one form per representation.

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 feel that the LOCAL PLAN should be modified by removing the CORNWALL AVE field from the Housing Site and designating the field as a 'LOCAL GREEN SPACE'. In addition the adjacent long, thin field known locally as the "horsefield" at the side of the recreation ground should also be designated as 'LOCAL GREEN SPACE'. These two small areas provide a beautiful small area of countryside between the Rylands and the SEVERN TRENT SITE. These fields are full of wildlife, birds and natural beauty. The trees form a beautiful green backdrop to the Recreation ground making it feel very much like the countryside. It provides the children of the area a special area to explore and experience nature and wildlife, which is beneficial to their development and understanding of the natural world. It also gives children additional space and freedom to explore. It is used by dog walkers and is especially useful when there are football matches on the recreation ground as dogs can go on the horsefield & the Cornwall Ave field and not disturb the game. These two areas are well used and locally valued. Designating these two fields as "LOCAL GREEN SPACE" would be justified due to their local importance.

precise
see
yellow
area
on
Map.

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.

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Yes, I wish to participate at the public examination

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- '**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'.
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Policy: 3.5 Severn Trent, Beeston

3.13 Located in the Main Built up Area of Nottingham, the site is located to the south east of Beeston Town Centre and is situated directly adjacent to the Strategic Core Strategy allocation of Boots (to the east) in-between the Beeston Canal (to the south), the railway line (to the north) and the existing residential area of Beeston Rylands to the west. The site is brownfield and has previously been used as a sewage treatment works by Severn Trent Water.

3.14 The following key development requirements must be met.

Key Development Requirements:

- 150 homes to be located towards the north of the site
- Provide soft landscaping and minimise external lighting along the canal side boundary
- Provide enhanced Green Infrastructure corridors linking urban areas of Beeston to the north and west with the canal side towpath
- Provide pedestrian bridge to link to the canal side towpath
- Vehicle access to only be at the north of the site onto Lilac Grove

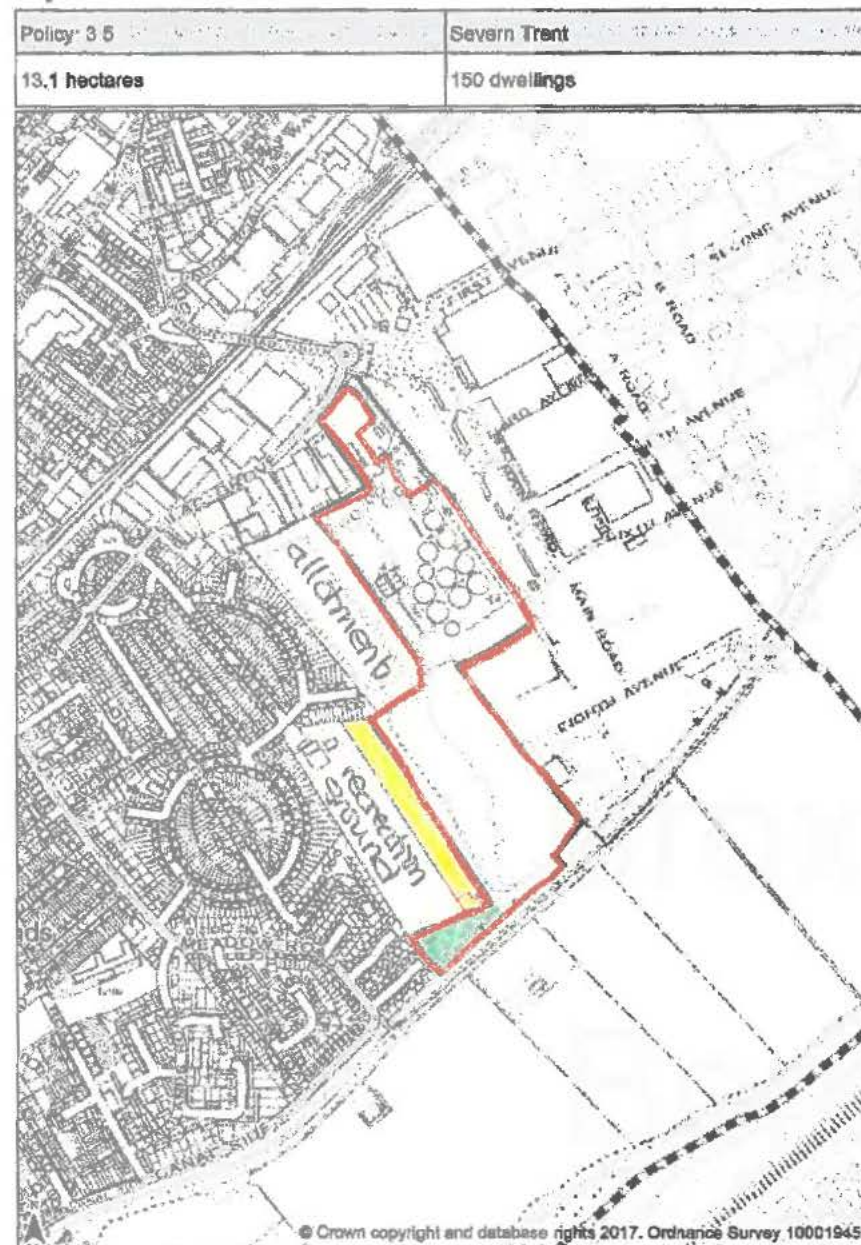
Key Development Aspirations;

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

3.15 This allocation has significant housing, health, transport and innovation (due to the Enterprise Zone) objectives benefits; and only minor negative effect on the biodiversity and green infrastructure objective due to the adjoining Beeston Canal Local Wildlife Site.

Map 12: Severn Trent Beeston



ENGLAND B.C.
- 6 NOV 2017

BRACKNELL BOROUGH COUNCIL
- 3 NOV 2017

Broxtowe Part 2 Local Plan



Broxtowe
Borough
COUNCIL

Agent

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

Your Details

Title	Mr	Mrs	Miss	Ms	Other: <u>Dr</u>
Name	<u>Guy Carney</u>				
Organisation (if responding on behalf of the organisation)					
Address					
Postcode					
Tel. Number					
E-mail address					



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Please tick here



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	Policies Map	12	
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		<input checked="" type="checkbox"/>

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	<input checked="" type="checkbox"/>
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.

I feel the housing is not justified because of the high community value of the area as a green space:

- recreational value for dog walkers (we use the space daily)
- as a wildlife corridor - we see lots of bird-life in the space
- as an open, green space

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 request the following amendments should be made to the Local Plan

- a) That Cornwall Ave. field (with its surrounding hedgerows) be removed from the Severn Trent housing site
- b) That Cornwall Ave. field (with its surrounding hedgerows) be designated as 'Local Green Space'. It seems to meet all the criteria for this, in terms of value to the local community
- c) That the adjacent field also be included in the 'Local Green Space', because of its great value to wildlife and the community

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Broxtowe Part 2 Local Plan



Broxtowe
Borough
COUNCIL

Agent

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

Your Details

Title	Mr	Mrs	Miss	Ms	Other: <u>Dr.</u>
Name	<u>Katherine Deube</u>				
Organisation (If responding on behalf of the organisation)	<u>—</u>				
Address	<u>[Redacted]</u>				
Postcode	<u>[Redacted]</u>				
Tel. Number	<u>[Redacted]</u>				
E-mail address	<u>[Redacted]</u>				



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There is a field at the end of Cornwall Ave that is currently within the ^{proposed} housing site. I understand there are assurances that it won't be built on but if that is the case it should be removed from the housing site. That small field & the small strip of knd that runs between the playing field & the proposed housing site are greatly valued by the community. I walk my dog there everyday. The value of this small piece of knd as a haven for wildlife is immeasurable - as it helps form part of a green corridor which connects the canal to Lilac Grove. There is grassland, native hedgerow & I believe, remains of an ancient track. Its essential to character of the Rylands, being part of the green space in the Rylands. It will also be valued by those who will live in the new development.

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- Cornwall Ave field (+ surrounding hedgerows) ~~be~~ should be removed from Severn Trent housing site and be designated a "Local Green Space." (It meets the criteria as it is highly valued by the local community.)
- The strip of land between the playing fields and the proposed housing site ~~also~~ be ~~also~~ included in the "Local Green Space" for the same reason. Together they form an important green space for walkers, dog owners and wildlife.

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Broxtowe Part 2 Local Plan



Broxtowe
Borough
COUNCIL

- 3 NOV 2017

Agent

Please provide your client's name

Your Details

Title	Mr Mrs <u>Miss</u> Ms Other:
Name	MARYSIA ZIPSER
Organisation (If responding on behalf of the organisation)	
Address	[REDACTED]
Postcode	[REDACTED]
Tel. Number	[REDACTED]
E-mail address	[REDACTED]



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2.3	Sound	Not sound	✓

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

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Allocating the Cornwall Ave field (coloured green on the plan) for housing is 'not justified' as it is of greater value to the local community as a natural green space, for following reasons:-

- 1) It's a locally valued feature, being a small field of naturalized grass surrounded by native hedgerows
- 2) It's essential to the character & amenity of Cornwall Ave, being the focal point of this road.
- 3) It's of recreational value to walkers/dog owners who use the field every day, shown by the well-worn paths.
- 4) It's of historic interest; field & adjacent canal are over 200 years old/field contains remains of ancient track
- 5) It's a haven for wild life (including notable species) with grass-land, native hedge rows, & waterside habitats.
- 6) It's part of a green corridor stretching from canal almost to Lilac Grove - important route for wild life.
- 7) It's an easily accessible pocket of 'countryside' between Rylands & new Boots development
- 8) It's value to the community was demonstrated at Broxtowe's July CAT (Community Action Team) meeting where local folk voted unanimously (48 votes) to keep this field & not build here (vote verified by Cllr. Cullen).

Question 4: Modifications sought

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- a) Cornwall Ave field (with its surrounding hedgerows) should be designated as 'Local Green Space'. This will make the Local Plan 'sound' as the field is of special value to the local community, as described above, below.
- b) Cornwall Ave field (with its surrounding hedgerows) should be removed from the Sever Trent housing site.
- c) The adjacent field (coloured yellow on the attached plan) should also be included in the 'Local Green Space'. This 2nd field is an equally valued local feature of grassland surrounded by native hedgerows, as the 2 fields together form a half mile strip of 'countryside' between the Ryland and two Boots site, stretching from the canal right up to Leyton Crescent. This is a locally important route for wildlife, and is a route enjoyed daily by walkers or dog owners throughout the year, as proved by the well-worn paths. The local value of this 2nd field has also been expressed repeatedly at Broxtown's CAT meetings.

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

Question 5: Public Examination Attendance

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

Yes, I wish to participate at the public examination

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

✓

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

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

Guidance Note:

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

'Legally Compliant':

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'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**.

Policy: 3.5 Severn Trent, Beeston

3.13 Located in the Main Built up Area of Nottingham, the site is located to the south east of Beeston Town Centre and is situated directly adjacent to the Strategic Core Strategy allocation of Boots (to the east) in-between the Beeston Canal (to the south), the railway line (to the north) and the existing residential area of Beeston Rylands to the west. The site is brownfield and has previously been used as a sewage treatment works by Severn Trent Water.

3.14 The following key development requirements must be met.

Key Development Requirements:

- 150 homes to be located towards the north of the site
- Provide soft landscaping and minimise external lighting along the canal side boundary
- Provide enhanced Green Infrastructure corridors linking urban areas of Beeston to the north and west with the canal side towpath.
- Provide pedestrian bridge to link to the canal side towpath.
- Vehicle access to only be at the north of the site onto Lilac Grove

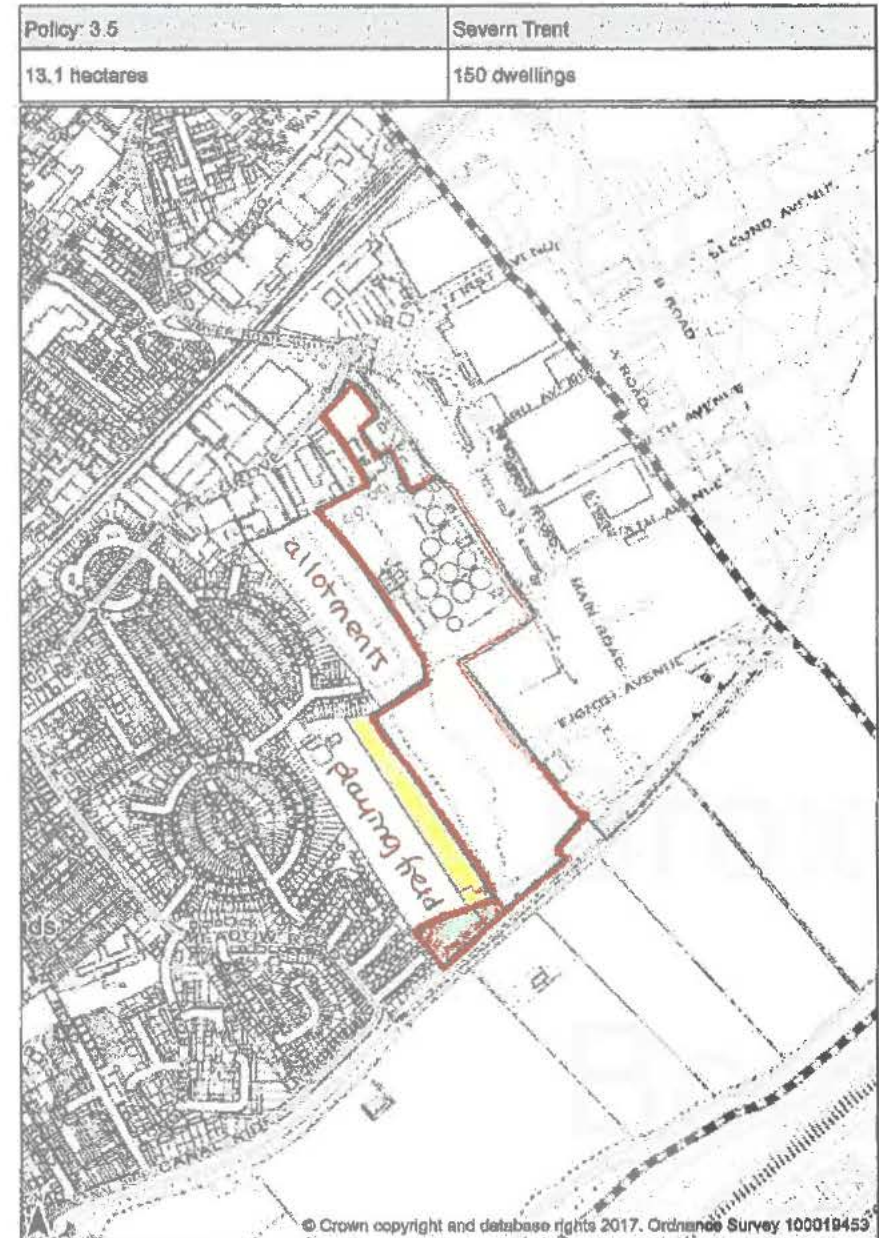
Key Development Aspirations;

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

3.15 This allocation has significant housing, health, transport and innovation (due to the Enterprise Zone) objectives benefits; and only minor negative effect on the biodiversity and green infrastructure objective due to the adjoining Beeston Canal Local Wildlife Site.

Map 12: Severn Trent Beeston



Broxtowe Part 2 Local Plan

Broxtowe Borough Council
Planning & Community Development

- 3 NOV 2017



Broxtowe
Borough
COUNCIL

Agent

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

Your Details

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

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

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

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

Please tick here ☒

Please help us save money and the environment by providing an e-mail address that correspondence can be sent to: ad@broxtowe.gov.uk

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	20	3.5
	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: (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		<input checked="" type="checkbox"/>

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	<input checked="" type="checkbox"/>
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.

I wish to add if all existing hedgerows
existing
or boundaries can be retained. Greenery
& birds & wildlife important to residents.

Question 4: Modifications sought

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

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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

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- '**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?

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Broxtowe Part 2 Local Plan



Broxtowe
Borough
COUNCIL

Agent

Please provide your client's name

Your Details

Title	Mr	Mrs	Miss	Ms	Other: PROFESSOR
Name	PAUL DYER				
Organisation (if responding on behalf of the organisation)	N/A				
Address	[Redacted Address]				
Postcode	[Redacted Postcode]				
Tel. Number	[Redacted Tel. Number]				
E-mail address	[Redacted E-mail address]				

Broxtowe Borough Council
Planning & Community Development

31 OCT 2017

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

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

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

Please tick here



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

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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	38+39	35 text/Paras 3-13-315
	Policy 4: Awsworth Site Allocation	and	
	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	12 - LOCAL GREEN SPACE POLICY 27/PAGE 154 all paragraphs		
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.

Including the Cornwall Avenue field is not justified and is of great concern for a variety of reasons:

- 1) The field is a locally very valuable 'green' feature providing a break between the other proposed Boots development and the Rylands - this needed to keep a 'green corridor' between the two developments.
- 2) It is of recreational value by walkers/dog owners - being used together with the adjacent 'horse field' backing onto Leyton Crescent by numerous local users as evidenced by the well-used paths.
- 3) It is of historic and wildlife value - I am told the fields canal are over 200 yrs old, providing a home for local wildlife.
- 4) It has educational value for learning about nature, due to accessibility.
- 5) Strong local opposition to building as per lobbying by Buxton C.A.T.

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.

- 1) The 'local green space' policy should be modified to include both the Cornwall Avenue field, but even more importantly the adjacent 'horse field' backing onto Leyton Crescent and thereby safeguard the future of both ~~the~~ ^{the} (being parallel to the recreation ground). The two fields together form a vital 'green space' strip of countryside between the Rylands and the new Boots development. The fields are much used for local walkers (ramblers etc.) by many from the community. The local value of both fields, especially the field backing onto Leyton Crescent, have been expressed repeatedly at the local Broxtowe C.A.T. meetings. Designation as 'Local Green Space' is therefore justified by ~~the~~ ^{its} special value to the community. They have been used for almost 20 years.
- 2) Cornwall Avenue field, with surrounding hedgerow, should be removed from the Severn Trent housing site.

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

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- '**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'.
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- '**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?

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Details

Agent	
Please provide your client's name	
Your Details	
Title	Mr
Name	Sheldon Zlotowitz
Organisation (If responding on behalf of an organisation)	
Address	██████████ ██████████ ██████████
Telephone Number	██████████
Email Address	██████████
Would you like to be contacted regarding future planning policy consultations?	No
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.)
27: Local Green Space	154				

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

Question 2

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

Question 3

Question 3: Why is the Local Plan unsound? Please only answer this question if you answered 'No' to 2.3 above	
If you think this paragraph or policy of the Plan is not sound, is this because:	
It is not justified	Yes
It is not effective	Yes
It is not positively prepared	Yes
It is not consistent with national policy	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 about allocation of the Cornwall avenue field for housing is not justified.</p> <p>It is greater value to the community as a green space.</p> <p>It is locally valued and used by many people including children and adults.</p> <p>It is of historic interest being an ancient track and is also a important habitat for wildlife.</p> <p>It also provides an important corridor for wildlife</p> <p>It's value was amply demonstrated at the July C.A.T. Meeting</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>Cornwall avenue site should be removed from the Severn Trent housing site and designated as a local green space. The adjacent field should also be included for similar reasons. It is used daily by great numbers of local residents.</p>

Question 5

Question 5: Public Examination Attendance	
<p>If your representation is seeking a modification, do you consider it necessary to participate at the public examination?</p>	<p>Yes</p>
<p>If you wish to participate at the public examination, please outline why you consider this to be necessary</p>	<p>To ensure local representatives are held accountable.</p>

Details

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

Policy relates to

Please specify what your comment relates to					
Policy number	Page number	Policy text/ Paragraph number	Policies Map	Sustainability Appraisal	Other (e.g. omission, evidence document etc.)
3: Main Built up Area Site Allocations	38, 39	Policy / Text 3.5	12		

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

Question 2

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

Question 3

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

Additional details

<p>Please give details of why you consider this part of the Local Plan is not legally compliant, is unsound or does not comply with the duty to co-operate. Alternatively, if you wish to support any of these aspects please provide details.</p>	<p>It is a locally valued natural green space, and although classified as previous industrial use, it has always been farming land. It is an essential part of Cornwall Avenue, being the focal point of the road. It has historic interest allowing public access to the 200 year old canal, and has the remains of ancient cart track visible on the north edge. It is a haven for wildlife, weasels, small rodents, hedgehogs and frogs. Due to easy access to the canal many species use the field hedgerows. The field allows a full green corridor through to Lilac Grove.</p>
---	--

Question 4

Question 4: Modifications sought	
<p>Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this modification will make the Local Plan legally compliant or sound.</p>	<p>a) That the Cornwall Avenue field, with its surrounding hedgerows, is removed from the Severn Trent housing site.</p> <p>b) That the Cornwall Avenue field, with its surrounding hedgerows, be designated 'Local Green Space'. It seems to meet all the criteria for 'Local Green Space' in view of the value to the local community listed above.</p>

Question 5

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

Details

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

Policy relates to

Please specify what your comment relates to					
Policy number	Page number	Policy text/ Paragraph number	Policies Map	Sustainability Appraisal	Other (e.g. omission, evidence document etc.)
3: Main Built up Area Site Allocations	38/39	3.5	12		

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>we request that the small green space at the end of Cornwall avenue should be removed from the seven trent housing site, this space is used on a daily basis by a very big number of local residents, it is a locally valued feature with lots of wildlife and mature hedgerows. We all class this small area of green land as local green space and it should not be built on.</p>
---	--

Question 4

Question 4: Modifications sought	
<p>Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this modification will make the Local Plan legally compliant or sound.</p>	<p>we request that the small green space at the end of cornwall avenue is removed from the seven trent housing plan, we understand that wa kways will be needed but i am very worried about our avenue being opened up to create a new access to the housing plan. We have 2 young children that currently use the green space as a safe play area.</p>

Question 5

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

6812

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: M's
Name	PHILIP WOOD & NOEMI LOZANO HERNANDEZ
Organisation (if responding on behalf of the organisation)	
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 <u>would like</u> to be contacted by the Planning Policy Team regarding future consultations.	
Please tick here	<input type="checkbox"/>
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

Broxtowe Borough Council Planning & Community Development	
19 OCT 2017	

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	38 & 39	3-5 para 12
	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	12		
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.

ALLOCATING THE CORNWALL AVENUE FIELD IS 'NOT JUSTIFIED' AS IT IS OF GREATER IMPORTANCE TO THE LOCAL COMMUNITY AS A NATURAL GREEN SPACE

- LOCALLY VALUED FEATURE, A SMALL FIELD OF NATURALISED GRASS SURROUNDED BY MATURE HERBEROWS
- ESSENTIAL TO THE CHARACTER & AMENITY OF CORNWALL AVENUE BEING A FOCAL POINT OF THE ROAD
- OF RECREATIONAL VALUE TO WALKERS/DOG-OWNERS WHO USE THE FIELD EVERY DAY SHOWN BY WELL WORN PATHS
- OF HISTORIC INTEREST, FIELD & CANAL OVER 200 YRS OLD, FIELD CONTAINS REMAINS OF ANCIENT TRACKS
- HAVEN FOR WILDLIFE (INCLUDING NOTABLE SPECIES) WITH GRASSLAND, MATURE HEDGES & WATERSIDE HABITATS
- PART OF GREEN CORRIDOR STRETCHING FROM THE CANAL TO KILAC GROVE - IMPORTANT FOR THE MOVEMENT OF WILDLIFE
- IS EASY ACCESSIBLE POCKET OF COUNTRYSIDE BETWEEN FARMS & ROAD DEVELOPMENT
- VALUE TO LOCAL COMMUNITY DEMONSTRATED AT JULY CAT MEETING WHERE UNANIMOUS (48 VOTES) VOTE TO KEEP THE FIELD AS IS & NOT BUILD ON IT.

PLEASE SEE ATTACHED PLAN MARKED IN GREEN

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.

- a) CORNWALL AVENUE FIELD WITH SURROUNDING HEDGEROWS BE REMOVED FROM THE SEVERN TRENT HOUSING SITE
- b) CORNWALL AVENUE FIELD + SURROUNDING HEDGEROWS BE DESIGNATED AS 'LOCAL GREEN SPACE'. SEEMS TO MEET ALL CRITERIA FOR 'LOCAL GREEN SPACE' IN VIEW OF ITS VALUE TO THE LOCAL COMMUNITY.
- c) THAT THE ADJACENT FIELD COLOURED YELLOW ON THE PLAN ALSO BE INCLUDED IN THE LOCAL GREEN SPACE. SECOND FIELD IS ALSO AN IMPORTANT LOCAL FEATURE OF GRASSLAND SURROUNDED BY MATURE HEDGEROWS. THE 2 FIELDS TOGETHER FORM A $\frac{1}{2}$ MILE STRIP OF COUNTRYSIDE BETWEEN THE RYLANDS + BOOTS SITE STRETCHING FROM THE CANAL UP TO LEYTON CRESCENT. THIS IS LOCALLY IMPORTANT FOR WILDLIFE, AND IS A ROUTE ENJOYED DAILY BY WALKERS + DOG OWNER THROUGHOUT THE YEAR, AS INDICATED BY WELL WORN PATHS. LOCAL PEOPLE WOULD LIKE TO KEEP THIS SPACE GREEN AS EXPRESSED REPEATEDLY AT BROXTONE CAT MEETINGS.

PLEASE SEE ATTACHED PLAN MARKED IN GREEN + YELLOW

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

Question 5: Public Examination Attendance

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

Yes, I wish to participate at the public examination

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

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

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

Guidance Note:

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

'Legally Compliant':

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

'Compliant with the Duty to Co-operate':

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

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

'Sound'

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

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

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

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

Policy: 3.5 Severn Trent, Beeston

3.13 Located in the Main Built up Area of Nottingham, the site is located to the south east of Beeston Town Centre and is situated directly adjacent to the Strategic Core Strategy allocation of Boots (to the east) in-between the Beeston Canal (to the south), the railway line (to the north) and the existing residential area of Beeston Rylands to the west. The site is brownfield and has previously been used as a sewage treatment works by Severn Trent Water.

3.14 The following key development requirements must be met.

Key Development Requirements:

- 150 homes to be located towards the north of the site
- Provide soft landscaping and minimise external lighting along the canal side boundary
- Provide enhanced Green Infrastructure corridors linking urban areas of Beeston to the north and west with the canal side towpath
- Provide pedestrian bridge to link to the canal side towpath
- Vehicle access to only be at the north of the site onto Lilac Grove

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

3.15 This allocation has significant housing, health, transport and innovation (due to the Enterprise Zone) objectives benefits; and only minor negative effect on the biodiversity and green infrastructure objective due to the adjoining Beeston Canal Local Wildlife Site.

Map 12: Severn Trent Beeston



Broxtowe Part 2 Local Plan



Broxtowe
Borough
COUNCIL

Agent

Please provide your client's name

Your Details

Title	Mr. Mrs Miss Ms Other:
Name	THALIA CROSSLAND
Organisation (if responding on behalf of the organisation)	
Address	
Postcode	
Tel. Number	
E-mail address	

Broxtowe Borough Council
Planning & Community Development

18 OCT 2017

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

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

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

Please tick here

☐

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

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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	38 9 39	3.5 4.5
	Policy 4: Awsworth Site Allocation		
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Sustainability Appraisal			
Other (e.g. omission, evidence document etc.)			

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

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2.1	Legally compliant		
2.2	Compliant with the duty to co-operate		
2.3	Sound		✓

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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.

It is not justified to use Cornwall Avenue for housing as there is greater value to the community as a green space.
 It is a small field with natural grass and mature hedgerows and is a focal point of the road. It is used by walkers and people with dogs every day and is next to the canal and over 200 years old.
 It is a haven for wildlife and by the way animals down the canal use it as well. It runs all the way up to Lilac Grove and used by all sorts of wildlife.

The meeting last by the C.A.T voted to keep it as it is by 48 votes. This meeting was all local people so it shows exactly what we want to happen - or not - here. Please consider this before the next meeting.

Question 4: Modifications sought

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We would like to have the field removed from the Severn Trent housing site.

We would like it kept as a "Green Space"

We would like the field next to it to be included in the plan as also being a "Green Space"

These two together form a natural Green Space for all users 'human and animal'.

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- '**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?

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- Provide pedestrian bridge to link to the canal side towpath.
- Vehicle access to only be at the north of the site onto Lilac Grove

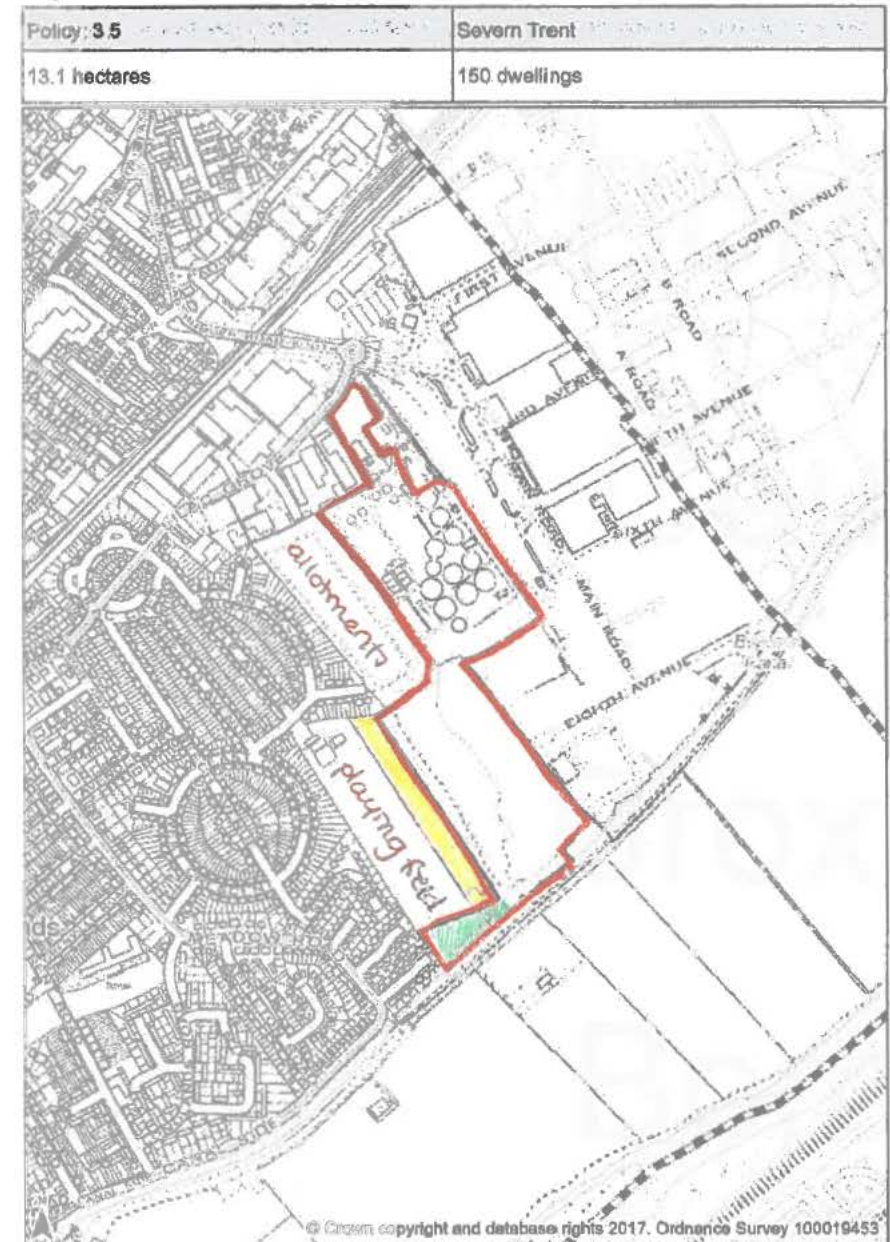
Key Development Aspirations;

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

3.15 This allocation has significant housing, health, transport and innovation (due to the Enterprise Zone) objectives benefits; and only minor negative effect on the biodiversity and green infrastructure objective due to the adjoining Beeston Canal Local Wildlife Site.

Map 12: Severn Trent Beeston



Details

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

Policy relates to

Please specify what your comment relates to					
Policy number	Page number	Policy text/ Paragraph number	Policies Map	Sustainability Appraisal	Other (e.g. omission, evidence document etc.)
3: Main Built up Area Site Allocations	38 & 39	3.5	12		

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

Question 2

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

Question 3

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

Additional details

<p>Please give details of why you consider this part of the Local Plan is not legally compliant, is unsound or does not comply with the duty to co-operate. Alternatively, if you wish to support any of these aspects please provide details.</p>	<p>Allocating the Cornwall Ave field is 'not sound' as it is of greater value to the local community as a natural green space.</p> <p>It's a locally valued feature, being a small field of naturalized grass surrounded by mature hedgerows.</p> <p>It's essential to the character & amenity of Cornwall Ave, being the focal point of this road.</p> <p>it's of recreational value to walkers/dog owners who use the field everyday, shown by the well worn paths.</p> <p>It's of historic interest:field & adjacent canal are over 200 years old/field contains remains of an ancient track.</p> <p>It's a haven for wildlife(including notable species)with grassland, mature hedgerows & waterside habitats.</p> <p>It's part of a green corridor stretching from the canal almost to Lilac Grove-important for movement of wildlife.</p> <p>It's an easily accessible pocket of countryside between the Rylands & the new Boots development.</p> <p>It's value to the local community was demonstrated at Broxtowe's July CAT meeting where the locals voted unanimously to keep this as a field & not build here.</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>That Cornwall Ave field(with it's surrounding hedgerows) to be removed from the Severn Trent housing site.</p> <p>That Cornwall Ave field(with it's surrounding hedgerows) be designated as 'Local Green Space'. It seems to meet all the criteria in view of it's value to the local community listed previously.</p> <p>That the adjacent field also be included in the 'Local Green Space'. This 2nd field is also an important local feature of grassland surrounded by mature hedgerows. The 2 fields together form a half mile strip of countryside between the Rylands & the Boots site, stretching from the canal right up to Leyton Crescent. This is locally important for wildlife, and is a route enjoyed daily by walkers and dog owners throughout the year, as proved by the well worn paths. Many locals want to keep this natural green space as has been repeatedly expressed at Broxtowe's CAT meetings</p>

Question 5

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

Details

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

Policy relates to

Please specify what your comment relates to					
Policy number	Page number	Policy text/ Paragraph number	Policies Map	Sustainability Appraisal	Other (e.g. omission, evidence document etc.)
3: Main Built up Area Site Allocations	Pages 38-39,	Policy text 3.5	12		

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>It is not justified to include the field next to Cornwall Avenue and part of Suffolk Avenue in the housing site, as it's of such importance to us as a natural green space because it's, valued locally for amenity, wildlife, recreation, historic interest (200 year old field), it's well-used by walkers/dog owners, birdwatchers and wildlife enthusiasts.</p>
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Question 4

Question 4: Modifications sought	
<p>Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this modification will make the Local Plan legally compliant or sound.</p>	<p>The Local Plan should be modified by removing the Cornwall Avenue / Suffolk Avenue field from the housing site and designating it as 'Local Green Space'. The 'horse field' at the far side of the recreation ground should also be designated as 'Local Green Space'.</p> <p>These two fields together form a half mile strip of countryside between the Rylands and the Boots site, stretching from the canal to Leyton Crescent – an important route for wildlife and walkers – well used and locally valued. Designating the two fields as 'Local Green Space' would be justified because of their special local importance.</p>

Question 5

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

Details

Agent	
Please provide your client's name	Glynis Harris
Your Details	
Title	
Name	
Organisation (If responding on behalf of an organisation)	
Address	
Telephone Number	
Email Address	
Would you like to be contacted regarding future planning policy consultations?	No
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	38-39	3.5	12		

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	No
It is not effective	No
It is not positively prepared	No
It is not consistent with national policy	No

Additional details

<p>Please give details of why you consider this part of the Local Plan is not legally compliant, is unsound or does not comply with the duty to co-operate. Alternatively, if you wish to support any of these aspects please provide details.</p>	<p>It is not justified to include Cornwall Avenue field in the housing site, as it is of such importance to us as a natural green space because it is valued locally for amenity, wildlife, recreation, historic interest (200 yr old field). It is well used by dog walkers/dog owners</p>
---	---

Question 4

Question 4: Modifications sought	
<p>Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this modification will make the Local Plan legally compliant or sound.</p>	<p>The Local Plan should be modified by removing the Cornwall Avenue field from the housing site and designating it as 'local green space'</p> <p>The long horse field at the far side of the rec should also be designated as 'local green space'</p> <p>These two fields form a half mile strip of countryside between Rylands and the Boots Site, stretching from the Canal to Leyton Crescent - an important route for wildlife and walkers - well used and valued locally. Designating the two fields as 'Local Green Space' would be justified because of their special local importance.</p>

Question 5

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

Details

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

Policy relates to

Please specify what your comment relates to					
Policy number	Page number	Policy text/ Paragraph number	Policies Map	Sustainability Appraisal	Other (e.g. omission, evidence document etc.)
3: Main Built up Area Site Allocations	38, 39	3.5	12		

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

Question 2

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

Question 3

Question 3: Why is the Local Plan unsound? Please only answer this question if you answered 'No' to 2.3 above	
If you think this paragraph or policy of the Plan is not sound, is this because:	
It is not justified	No
It is not effective	Yes
It is not positively prepared	No
It is not consistent with national policy	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>Designating the Cornwall Avenue field, plus its associated field running north between the Lilac Grove recreation park and the old Beeston Council tip as a Local Green Space would break up the proposed built up housing area of Boots and Beeston Rylands.</p> <p>It has some wildlife value in that the land consists of old horse paddocks with no artificial fertiliser added. Warblers such as Lesser Whitethroat and Common Whitethroat have bred here.</p> <p>The bees which occur in my garden such as Buff-tailed Bumblebee, Garden Bumblebee, Carder Bumblebee and Hairy-footed Flower Bees all must originate from here as they nest in the ground often in tussocks of grass. Butterflies like the grassland species Gatekeeper and bush/hedge species as the Holly Blue occur here.</p> <p>Although I am not a dog owner I feel some sympathy for them. All the local paths are used heavily by cyclists (most not local) and the local rugby club and University sports grounds are dissuading dogs on the grounds (quite correctly in my opinion).</p>
---	--

Question 4

Question 4: Modifications sought	
<p>Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this modification will make the Local Plan legally compliant or sound.</p>	<p>Please remove the Cornwall Avenue field and the old paddock situated between the old Beeston Council tip and the present Leyton Crescent recreation ground along with their surrounding Hedgerows from the Seven Trent Housing Plan.</p> <p>The above area designated as a Local Green Space.</p>

Question 5

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

Broxtowe Part 2 Local Plan



Broxtowe
Borough
COUNCIL

Agent

Please provide your client's name

Your Details

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

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

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

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

Please tick here



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www.broxtowe.gov.uk/part2localplan

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

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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	Pgs 38 and 39	3.5
	Policy 4: Awworth 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	12		
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		<input checked="" type="checkbox"/>

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	<input checked="" type="checkbox"/>
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.

The Cornwall Avenue field is of great value to the local community. It is a natural green space valued by the Rylands community young and old alike. It supports wildlife and naturalised grass surrounded by mature and established hedgerows. It is essential to the character and amenity of Cornwall Avenue as well as surrounding residential properties. It is used by walkers, dog walkers, children etc. It is of great value to the community both due to historic and recreational reasons.

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.

- 1) Cornwall Ave field removed from the Severn Trent Housing site.
- 2) Cornwall Ave field designated as local green space
- 3) The adjacent field (coloured yellow on the attached plan) should also be included in the local green space.

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

Question 5: Public Examination Attendance

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

Yes, I wish to participate at the public examination

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



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

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

Broxtowe Part 2 Local Plan



Broxtowe
Borough
COUNCIL

Agent

Please provide your client's name	N/A
-----------------------------------	-----

Your Details

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

Broxtowe Borough Council
Planning & Community Development

31 OCT 2017

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

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

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

Please tick here

☐

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

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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	388/39	3-13-3-15
	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	POLICY MAP 12 and local green space policy 27 / page 154		
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		<input checked="" type="checkbox"/>

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	<input checked="" type="checkbox"/>
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.

We have lived in the area for over 50 years and, as residents of over 80 years of age, we consider the inclusion of the field marked in green on the plan as unjustified.

It is an easily accessible pocket of countryside between Cornwall Avenue and the Severn Trent development.

Its of residential value to dog walkers including ourselves who can use the field on a daily basis throughout the year.

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 modifications should remove the Cornwall Ave field and surrounding hedgerows from the plan.

Cornwall Ave field should be designated 'Local Green space' on the plan. This would be justified as the field is of special value to us, as described in question 3.

The green space should also include the field marked yellow on the plan. The local value of this has been expressed at Brixton's C.A.T. meeting.

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

Question 5: Public Examination Attendance

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

Yes, I wish to participate at the public examination

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

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

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

Guidance Note:

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

'Legally Compliant':

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

'Compliant with the Duty to Co-operate':

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

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

'Sound'

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

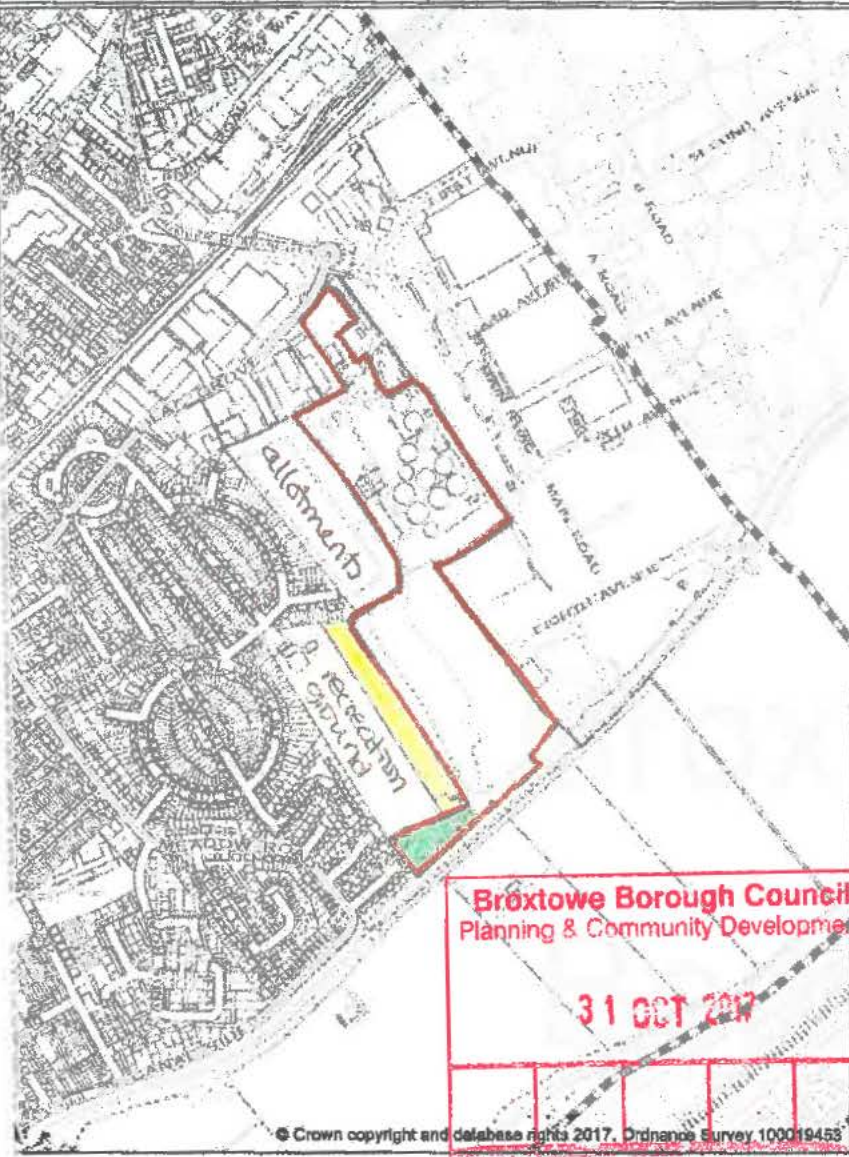
To meet the 'Test of Soundness', the independent Planning Inspector is required to consider whether or not our Local Plan is 'justified', 'effective', has been 'positively prepared', and is 'consistent with national policy'. You may wish to consider the following before making a representation on the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

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

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

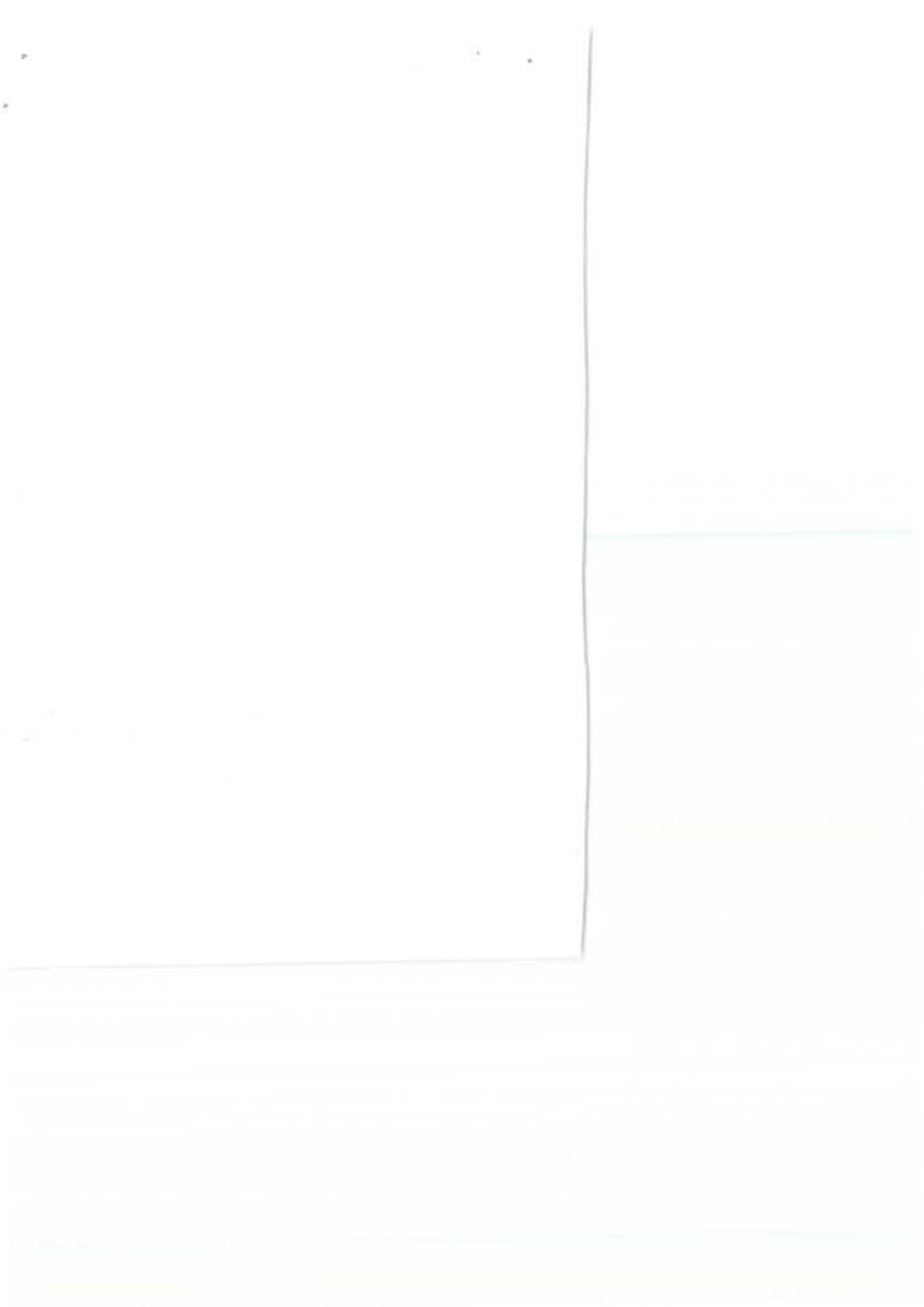
Map 12: Severn Trent Beeston

Policy 3.5	Severn Trent
13.1 hectares	150 dwellings



Broxtowe Borough Council
Planning & Community Development
31 OCT 2017

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Broxtowe Part 2 Local Plan



Broxtowe
Borough
COUNCIL

Agent

Please provide your client's name	N/A	Broxtowe Borough Council Planning & Community Development
-----------------------------------	-----	--

Your Details

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

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	Policy 9: Retention of good quality existing employment sites		
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	Policy 30: Landscape		
	Policy 31: Biodiversity Assets		
	Policy 32: Developer Contributions		
Policies Map	POLICY MAP 12, LOCAL GREEN SPACE POLICY 27 / PAGE 154 Paragraphs		
Sustainability Appraisal			
Other (e.g. omission, evidence document etc.)			

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2.1	Legally compliant		
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2.3	Sound		<input checked="" type="checkbox"/>

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It is not justified	<input checked="" type="checkbox"/>
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It is not positively prepared	
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Your comments

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The section of land (coloured green on the plan) is not justified for development use as it is of greater use to residents as a natural green space and, should be removed from the plan.

It is a locally valued feature of almost 1.5 acres of natural hedgeland and a focal point of Cornwall Avenue. Recreational value to dog walkers. Haven for wildlife with mature hedgerows and waterside habitat.

Question 4: Modifications sought

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1. Cornwall Ave and surrounding fields removed from the plan.
2. Cornwall Avenue field with surrounding hedgerows removed from the Severn Trent housing site. This would be justified as the field is of special value to the local community.
3. The local green space should include the adjacent field (coloured yellow on the attached plan) a 2.5 acre green strip of grass and scrub surrounded by hedgerows. The 2nd field is of equal importance as it is a valuable route for wildlife, used daily by walkers throughout the year. The fields are justified by its special value to the community.

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Yes, I wish to participate at the public examination

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



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'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**](mailto:policy@broxtowe.gov.uk).

Policy: 3.5 Severn Trent, Beeston

3.13 Located in the Main Built up Area of Nottingham, the site is located to the south east of Beeston Town Centre and is situated directly adjacent to the Strategic Core Strategy allocation of Boots (to the east) in-between the Beeston Canal (to the south), the railway line (to the north) and the existing residential area of Beeston Rylands to the west. The site is brownfield and has previously been used as a sewage treatment works by Severn Trent Water.

3.14 The following key development requirements must be met.

Key Development Requirements:

- 150 homes to be located towards the north of the site.
- Provide soft landscaping and minimise external lighting along the canal side boundary
- Provide enhanced Green Infrastructure corridors linking urban areas of Beeston to the north and west with the canal side towpath
- Provide pedestrian bridge to link to the canal side towpath
- Vehicle access to only be at the north of the site onto Lilac Grove.

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

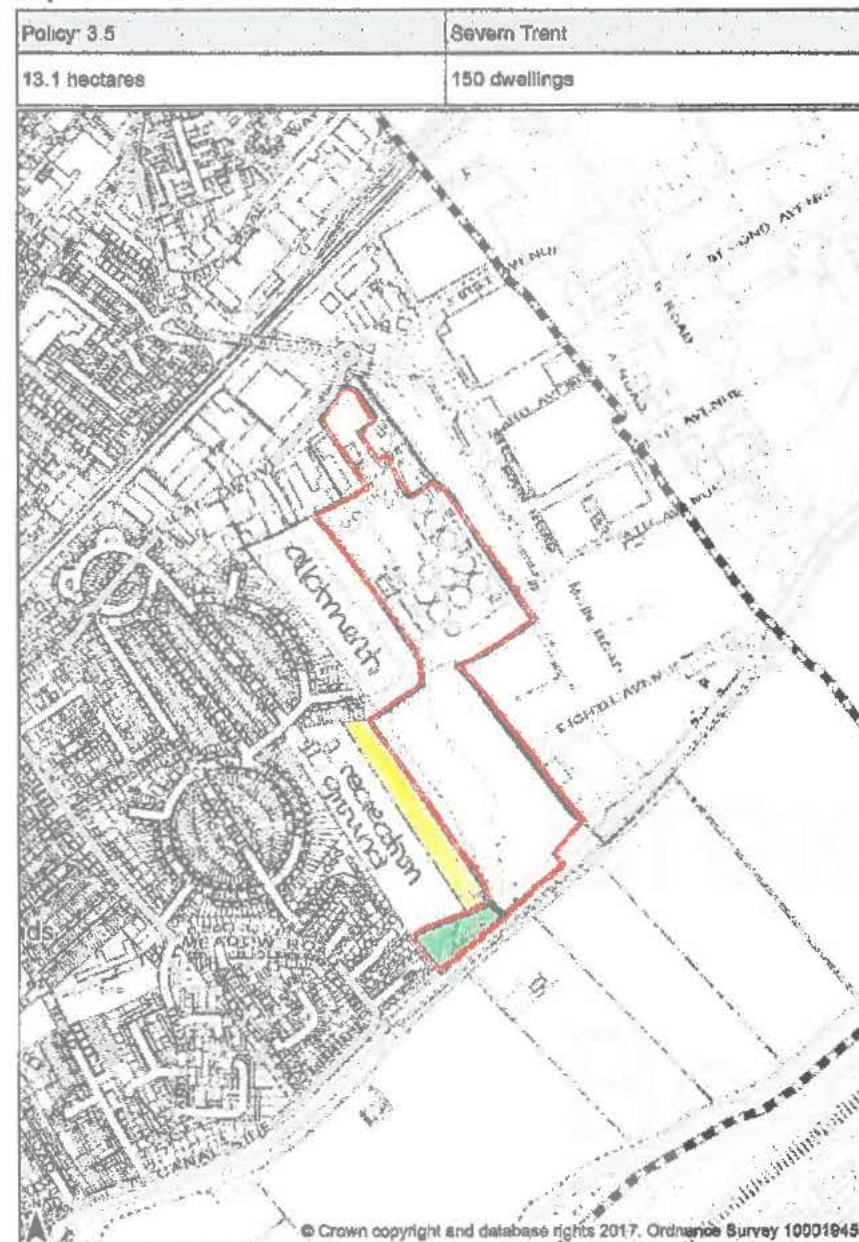
3.15 This allocation has significant housing, health, transport and innovation (due to the Enterprise Zone) objectives benefits; and only minor negative effect on the biodiversity and green infrastructure objective due to the adjoining Beeston Canal Local Wildlife Site.

Broxtowe Borough Council
Planning & Community Development

31 OCT 2017

All policies should be read in conjunction with the Local Plan Part 1 – Broxtowe Borough Aligned Core Strategy. No policy should be applied in isolation; account will be taken of all relevant policies.

Map 12: Severn Trent Beeston



Broxtowe Part 2 Local Plan



Broxtowe
Borough
COUNCIL

Agent

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

Your Details

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



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

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

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

Please tick here



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

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	38+39	35 / 3.13-3.15
	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	154	All
	Policy 28: Green Infrastructure Assets		
	Policy 29: Cemetery Extensions		
	Policy 30: Landscape		
	Policy 31: Biodiversity Assets		
	Policy 32: Developer Contributions		
Policies Map	12:		
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.

Including the Cornwall Avenue field in a housing site is not justified' as this is of much greater value to the local community as a natural green space - for the following reasons. -

- It is a locally valued feature, being almost 1.5 acres of naturalised grassland surrounded by mature hedge rows.
- It has recreational value to walkers/dog owners who use the field on a daily basis. - shown by well worn paths.
- Of historic interest. Field & adjacent canal are over 200 yrs old.
- Field contains remains of an ancient track.
- Haven for wildlife, with grassland, mature hedgerows & waterside habitats.
- Part of a green corridor stretching from canal almost to railway line - like grove/crescent... - valuable refuge for wildlife.
- Educational value to children due to accessibility.
- Value to community demonstrated at Broxtone's July C.A.T. meeting where it was voted to keep this field free from building.

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.

- a) Cornwall Avenue field (with its surrounding hedges) should be removed from the Severn Trent Housing Site.
- b) Cornwall Avenue field & hedges should be designated as a 'Local Green Space' in the Local Plan. This would be 'justified' as the field is of special value to the local community, as described in Q.3.
- c) The 'Local Green Space' should also include the adjacent field (coloured yellow on the attached plan) - a 2.5 acre strip of grass & scrub surrounded by mature hedges. This 2nd field is an equally valued local feature. Valuable green corridor to Lagan Crescent and the allotments. A green route enjoyed by wildlife + dog walkers - well worn paths. The local value of this field was also expressed at Broomby's CAT meetings. Designation of 'Local Green Space' is therefore justified by its special value to the community.

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

Question 5: Public Examination Attendance

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

Yes, I wish to participate at the public examination

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



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

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

Guidance Note:

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

'Legally Compliant':

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

'Compliant with the Duty to Co-operate':

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

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

'Sound'

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

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

- '**Justified**': This means that the Local Plan is based upon a robust and credible evidence base. If you think that the evidence doesn't support the choice made in our Local Plan, or there are realistic alternatives, then your comments may relate to whether or not it is 'justified'.
- '**Effective**': This means that the Local Plan will deliver what it sets out to. If you think that what we are proposing in the Local Plan is not deliverable, then your comments may relate to whether or not our Local Plan is 'effective'.
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Policy: 3.5 Severn Trent, Beeston

3.13 Located in the Main Built up Area of Nottingham, the site is located to the south east of Beeston Town Centre and is situated directly adjacent to the Strategic Core Strategy allocation of Boots (to the east) in-between the Beeston Canal (to the south), the railway line (to the north) and the existing residential area of Beeston Rylands to the west. The site is brownfield and has previously been used as a sewage treatment works by Severn Trent Water.

3.14 The following key development requirements must be met.

Key Development Requirements:

- 150 homes to be located towards the north of the site
- Provide soft landscaping and minimise external lighting along the canal side boundary
- Provide enhanced Green Infrastructure corridors linking urban areas of Beeston to the north and west with the canal side towpath
- Provide pedestrian bridge to link to the canal side towpath
- Vehicle access to only be at the north of the site onto Lilac Grove

Key Development Aspirations;

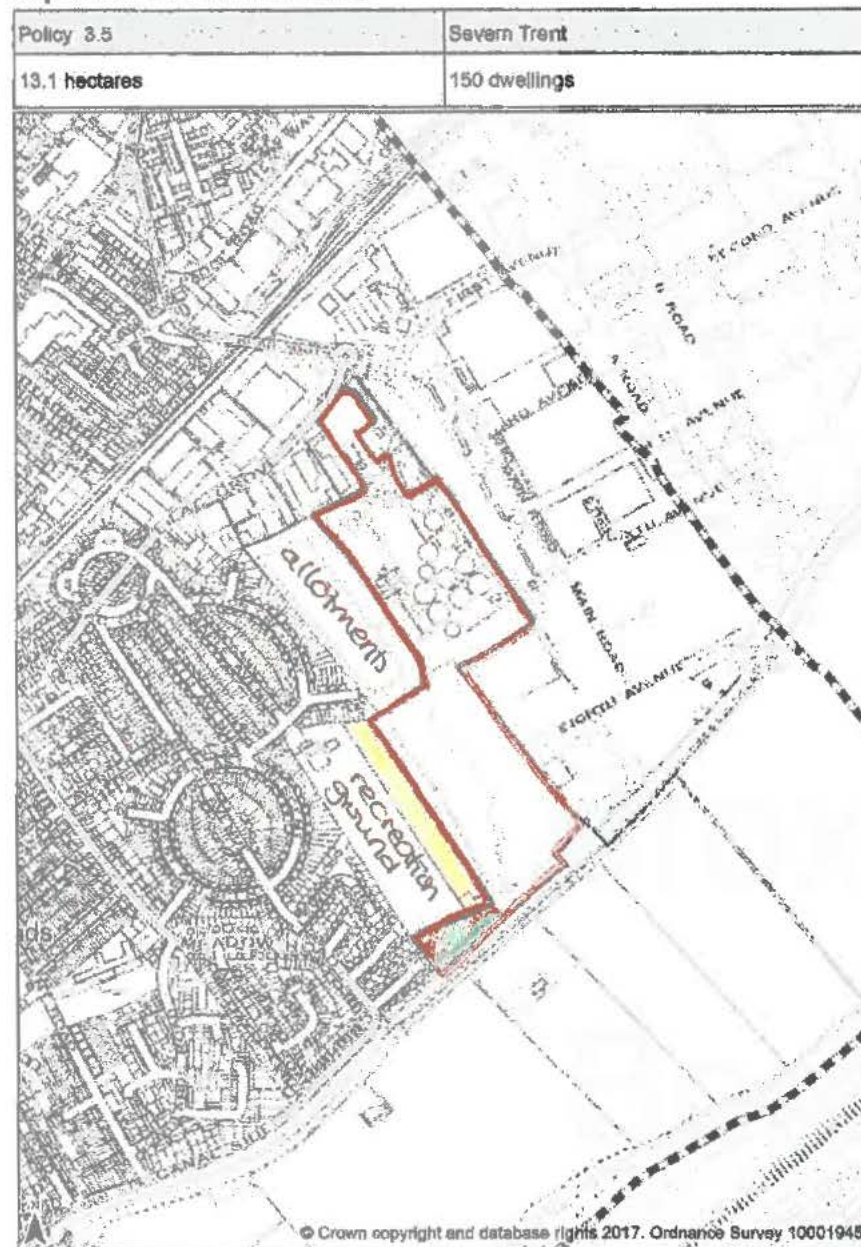
1. Mitigate highways impact on the wider road network to ensure that congestion is not made worse than currently exists.

What the Sustainability Appraisal says

3.15 This allocation has significant housing, health, transport and innovation (due to the Enterprise Zone) objectives benefits; and only minor negative effect on the biodiversity and green infrastructure objective due to the adjoining Beeston Canal Local Wildlife Site.



Map 12: Severn Trent Beeston



Broxtowe Part 2 Local Plan



Broxtowe
Borough
COUNCIL

Agent

Please provide your client's name

Your Details

Title	Mr *	Mrs	Miss	Ms	Other:
Name	John McCormack				
Organisation (if responding on behalf of the organisation)					
Address					
Postcode					
Tel. Number					
E-mail address					

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

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

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

Please tick here

☐

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

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

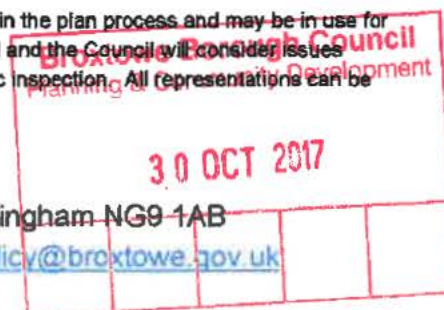
www.broxtowe.gov.uk/part2localplan

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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	38-39	3.5
	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		
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	Policy 19: Pollution, Hazardous Substances and Ground Conditions		
	Policy 20: Air Quality		
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	Policy 23: Proposals affecting designated and non-designated heritage assets		
	Policy 24: The health impacts of development		
	Policy 25: Culture, Tourism and Sport		
	Policy 26: Travel Plans		
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	Policy 29: Cemetery Extensions		
	Policy 30: Landscape		
	Policy 31: Biodiversity Assets		
	Policy 32: Developer Contributions		
Policies Map	12		
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	yes	
2.2	Compliant with the duty to co-operate		no
2.3	Sound		no

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

If you think this paragraph or policy of the Plan is not sound, is this because:	
It is not justified	yes
It is not effective	no
It is not positively prepared	no
It is not consistent with national policy	no

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.

Including the field at the end of Cornwall Avenue in the Severn Trent housing site is 'not justified' as it is of greater value to the local community as a natural green space for the following reasons:

It's part of a green corridor stretching from the canal almost to Lilac Grove – an important route for wildlife. It's of historic interest: field & adjacent canal are over 200yrs old / field contains remains of an ancient track.

It's a haven for wildlife (including notable species) with grassland, mature hedgerows & waterside habitats.

It's an easily accessible pocket of 'countryside' between Rylands and new Boots development.

It's a locally valued feature, being a small field of naturalised grass surrounded by mature hedgerows.

It's essential to the character and amenity of Cornwall Ave, being the focal point of this road. - It's of recreational value to walkers/dog owners who use the field every day, shown by the well-worn paths.

Its value to the community was demonstrated at Broxtowe's July C.A.T. (Community Action Team) meeting where local folk voted unanimously (48 votes) to keep this field & not build here (vote verified by Cllr Cullen).

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.

- a) Cornwall Ave field (with its surrounding hedgerows) should be removed from the Severn Trent housing site.
- b) Cornwall Ave field (with its surrounding hedgerows) should be designated as 'Local Green Space' on the Local Plan. This would be 'justified' as the field is of special value to the local community, as described above.
- c) The adjacent field (which extends alongside the full length of Leyton Crescent Recreation Ground) should also be included in the 'Local Green Space'.

This 2nd field is an equally valued local feature of grassland surrounded by mature hedgerows, as the 2 fields together form a half mile strip of 'countryside' between the Rylands and the Severn Trent site, stretching from the canal up to Leyton Crescent.

This is a locally important route for wildlife, and is a route enjoyed daily by walkers and dog owners throughout the year, as proved by the well-worn paths.

The local value of this 2nd field has also been expressed repeatedly at Broxtowe's C.A.T. meetings. Designation as 'Local Green Space' is therefore 'justified'.

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

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

no

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

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

Details

Agent	
Please provide your client's name	Theresa Gormn
Your Details	
Title	Miss
Name	Theresa Gorman
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	38/39	Policy text 3.5	12		Relate to Severn Trent site

Question 1: What does your comment relate to? Please specify exactly
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Question 2

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

Question 3

Question 3: Why is the Local Plan unsound? Please only answer this question if you answered 'No' to 2.3 above	
If you think this paragraph or policy of the Plan is not sound, is this because:	
It is not justified	Yes
It is not effective	Yes
It is not positively prepared	No
It is not consistent with national policy	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>Allocating the Cornwall Ave field for housing is not justified as it is of greater value to the local community as a natural green space for the following reasons:</p> <ol style="list-style-type: none"> 1. It is a locally valued feature, being a small field of naturalised grass surrounded by mature hedgerows. 2. It's essential to the character and amenity of Cornwall Ave, being the focal point of this road. 3. It's of recreational value to walkers, dog owners who use the field every day, shown by the well worn paths. 4. It's of historic interest, field and adjacent canal are over 200 years old, field contains remains of an ancient track. 5. It is a haven for wildlife with grassland, mature hedgerows and waterside habitats. 6. It is part of a green corridor stretching from canal almost to Lilac Grove, which is an important route for wildlife. 7. It's an easily accessible pocket of countryside between Rylands and new Boots development. 8. The value to the community was demonstrated at Broxtowe's Jult C.A.T meeting (Community Action Team) where local folk voted unanimously to keep this field and not build here (vote verified by Cllr Cullen).
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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>	<ol style="list-style-type: none"> 1. Cornwall Ave field (with its surrounding hedgerows) should be removed from the Severn Trent housing site 2. Cornwall Ave field (with its surrounding hedgerows) should be designated as 'Local Green Space'. This will make the local plan 'sound' as the field is of special value to the local community, as described above. 3. The adjacent field should also be included in the 'Local Green Space' This 2nd field is an equally valued local feature of grassland surrounded by mature hedgerows, as the 2 fields together form a half mile strip of 'countryside' between the Rylands and the Boots site, stretching from the canal right up to Leyton Crescent. This is a locally important route for wildlife, and is a route enjoyed daily by walkers and dog owners throughout the year, as proved by the well worn paths. The local value of this 2nd field has also been expressed repeatedly at Broxtowe's CAT meetings.

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>	No
<p>If you wish to participate at the public examination, please outline why you consider this to be necessary</p>	

Details

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

Policy relates to

Please specify what your comment relates to					
Policy number	Page number	Policy text/ Paragraph number	Policies Map	Sustainability Appraisal	Other (e.g. omission, evidence document etc.)
3: Main Built up Area Site Allocations	38 and 39	3.5	12		

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

Question 2

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

Question 3

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

Additional details

<p>Please give details of why you consider this part of the Local Plan is not legally compliant, is unsound or does not comply with the duty to co-operate. Alternatively, if you wish to support any of these aspects please provide details.</p>	<p>Allocating the Cornwall Ave field for housing is not justified because it is of greater value to the local community as a natural green space for the following reasons:</p> <p>It is a locally valued feature being a small field of naturalised grass surrounded by mature hedgerows being a haven for wildlife including bats, small rodents, frogs (this being one of the few places there is easy access to the water), weasels and I have found recent evidence of hedgehog activity.</p> <p>It is of recreational value to walkers who use the field every day and a safe meeting place in the warmer months for local teenagers as it is close to houses whilst being green (as opposed to the weir field which recent events show is not a safe place for young people to gather)</p> <p>It's of historic interest; the field and adjacent canal are over 200 years old and the top part of the field contains remains of an ancient track.</p> <p>It's part of a green corridor stretching from the canal towards Lilac Grove important for the movement of wildlife</p> <p>It is an easily accessible pocket of countryside between Rylands and the new Boots development.</p> <p>The insects that thrive in the field have increased the number of birds and species. Locally sparrows are on the incline and goldfinches, long tailed tits, chaffinches are regularly seen alongside the more usually spotted birds. The swans and geese regularly feed in the field and heron, cormorants and pheasant are spotted from time to time. Tawny owls fly past the field as part of their hunting area.</p>
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Question 4

Question 4: Modifications sought	
<p>Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this modification will make the Local Plan legally compliant or sound.</p>	<p>a) that the field at the end of Cornwall Ave and its surrounding hedgerows be removed from the Severn Trent housing site</p> <p>b) that the same field and surrounding hedgerows be designated as a local green space; it appears to meet all the requirements for Local Green Space in view of its value to the local community</p> <p>c) that the adjacent field running parallel to the Lilac Grove recreational park, meeting with the field at the bottom also be included in the Local Green Space as it is also an important local feature which, together with the Cornwall Ave field, forms a half mile strip of countryside stretching from the canal up to Leyton Crescent vital for the movement of wildlife. This strip of land also includes well established hedgerows.</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>	No
<p>If you wish to participate at the public examination, please outline why you consider this to be necessary</p>	