

Policy 11 – The Square;

ID	Organisation
Duty to Co-operate / Interests Groups	
211	Nottinghamshire County Council
1460	Beeston & District Civic Society
6276	Nottingham West Clinical Commissioning Group
6279	Bramcote Neighbourhood Forum
6882	Broxtowe Labour Group
Individual / Local Resident	
2565	Johnson
5893	Hartman
6912	Budden
6919	Stainer

Details

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

Policy relates to

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

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

Question 2

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

Question 3

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

Additional details

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

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

Question 5

Question 5: Public Examination Attendance

<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 help contribute to the discussion of this strategic site in terms of highway matters and help clarify any points raised for the Planning Inspector.</p>

Broxtowe Part 2 Local Plan



Broxtowe
Borough
COUNCIL

Agent

Please provide your client's name	
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Your Details

Title	
Name	
Organisation (If responding on behalf of the organisation)	BEESTON & DISTRICT CINC SOCIETY
Address	
Postcode	
Tel. Number	
E-mail address	

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: [REDACTED]

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

www.broxtowe.gov.uk/part2localplan

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

Please return completed forms to:

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

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

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

Document	Policy number	Page number	Policy text/ Paragraph number
Part 2 Local Plan	Policy 1: Flood Risk		
	Policy 2: Site Allocations		
	Policy 3: Main Built up Area Site Allocations		
	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	94	18.3
	Policy 12: Edge-of-Centre A1 Retail in Eastwood		
	Policy 13: Proposals for main town centre uses in edge-of-centre and out-of-centre locations		
	Policy 14: Centre of Neighbourhood Importance (Chilwell Road / High Road)		
	Policy 15: Housing size, mix and choice		
	Policy 16: Gypsies and Travellers		
	Policy 17: Place-making, design and amenity		
	Policy 18: Shopfronts, signage and security measures		
	Policy 19: Pollution, Hazardous Substances and Ground Conditions		
	Policy 20: Air Quality		
	Policy 21: Unstable land		
	Policy 22: Minerals		
	Policy 23: Proposals affecting designated and non-designated heritage assets		
	Policy 24: The health impacts of development		
	Policy 25: Culture, Tourism and Sport		
	Policy 26: Travel Plans		
	Policy 27: Local Green Space		
	Policy 28: Green Infrastructure Assets		
	Policy 29: Cemetery Extensions		
	Policy 30: Landscape		
	Policy 31: Biodiversity Assets		
	Policy 32: Developer Contributions		
Policies Map			
Sustainability Appraisal			
Other (e.g. omission, evidence document etc.)			

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

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

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

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

Your comments

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

There should be a coherent, ^{detailed} design policy in place for The Square as part of the Local Plan rather than a review process with an aim to modify proposals when submitted. There should be an emphasis in any brief on value to the community

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.

Any proposed residential development should balance the needs of potential residents against those of students with a requirement for a mix of types / affordability.

A design policy should contain a requirement for active frontages at ground floor level and the development must be coherent and futureproof.

The public realm should include flexible public open space with a community feel.

The policy should emphasise the importance of pedestrian connectivity to the surrounding area (eg Middle Street and Station Road) and should reflect and enhance the quality of adjacent open space and conservation areas.

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**.

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 Awsorth West of Awsorth (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

Bramcote Neighbourhood Forum
Response to Broxtowe Borough Council Part 2 Plan

Submitted by: [redacted] on
behalf of the Bramcote Neighbourhood Forum

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

Bramcote Neighbourhood Forum

Response to Broxtowe Borough Council Part 2 Plan

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

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



6882

3rd November 2017

Broxtowe Labour Group response to the Local Plan Part 2

Dear Steffan

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Yours sincerely,

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

Steffan Saunders
Broxtowe Borough Council
Foster Avenue
Beeston



3 November 2017

Dear Steffan

Broxtowe Core Strategy – Part 2

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Yours sincerely

Mike Johnson

[Redacted signature block]

[REDACTED]

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

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

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

Dear Sir/Madam,

Please could you forward this note to the appropriate authorities.

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

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

And many more.

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

Thank you for your kind attention

Yours sincerely

Tom Hartman

[REDACTED]

From: paul budden [REDACTED]
Sent: 02 November 2017 17:40
To: Policy
Subject: Broxtowe Part 2 Local Plan 2017-2028 -Broxtowe Borough Council, Policy 11 The Square Beeston, Page 94.

To Planning Policy ,Legal & Planning Services ,Foster Avenue.

Dear Madam /Sir

My personal details appear at the foot of this email as on your form for submission of comments .

I have considered policy 11 as detailed in the above subject heading and wish to make the following comments for this proposed development area .

1. There appears to be no provision for Public toilets in this area . It is more than likely that footfall will increase beyond the current figures with increased facilities . Beyond what is already generated with the tram /bus hub .Taking into account the stated desire to attract people in the evening who in their leisure are likely to drink in some form, as well, this would seem to be an omission .
2. There does not appear to be any provision for Green space or communal space where trees or other flora are provided with public seating .

With regards to both the above points the Authors of the Joseph Rowntree Foundation document : 'Why Sustainable Urban Neighbourhoods', state :-

'Key issues for new communities are quality public space' and that ' communal space should well managed.'

With the provision of housing in this area and the significant footfall it would appear that it would be necessary to attend to both 1.& 2. above if a quality public space & communal area is to be provided in this development .

yours faithfully

Paul Budden

Name Mr. Paul Budden,(not responding for any organisation.)

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Details

Agent	
Please provide your client's name	
Your Details	
Title	Ms
Name	Karen Stainer
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.)
11: The Square, Beeston					Omission

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>There should be a requirement to provide (fully accessible) public toilets at The Interchange. This is a basic human right for any transport interchange (bus/rail/air etc). It would also enable people to make long visits to Beeston and so benefit the town and its traders.</p> <p>It should be a requirement to include green space within any development in the town centre. This has proven benefit to health and wellbeing. It would again encourage visitors to the area to the economic benefit of the town.</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>see Q3</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>	