

Policy 27 – Local Green Space:

ID	Organisation
Duty to Co-operate / Interest Groups	
211	Nottinghamshire County Council
6279	Bramcote Neighbourhood Forum
6577	Chetwynd: The Toton and Chilwell Neighbourhood Forum
48	Sport England
119	Home Builders Federation
6975	Beeston Wildlife Group
6944	Brinsley Vision (Representing 70 Residents of Brinsley)
34	Nottinghamshire Wildlife Trust
Developer / Landowner	
6903	Beeston Fields Golf Club
6925	Hillside Gospel Hall Trust
6879	Crampin, Barden and Scott (Represented by SSA Planning Limited)
3756	Gladman Developments Limited
Individual / Local Resident	
460	Wallwork
1329	Beale
720	Pearson
2413	Zlotowitz
2565	Johnson
3349	Harris
3586	Austin
5896	Huxtable
6955	Gillies
6958	Zlotowitz
6959	McCourtney
6960	Groves

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.)
27: Local Green Space					

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.	Bramcote Moor Grassland LWS should be included within the Local Green Space area shown in Map 61, given its county-level importance for wildlife (which exceeds the ecological value of much of the other land included in the Local Green Space area).
---	---

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.	Bramcote Moor Grassland LWS should be included within the Local Green Space area shown in Map 61, given its county-level importance for wildlife (which exceeds the ecological value of much of the other land included in the Local Green Space area).

Question 5

Question 5: Public Examination Attendance	
If your representation is seeking a modification, do you consider it necessary to participate at the public examination?	Yes
If you wish to participate at the public examination, please outline why you consider this to be necessary	To help contribute to the discussion and help clarify any points raised for the Planning Inspector.

Bramcote Neighbourhood Forum
Response to Broxtowe Borough Council Part 2 Plan

Submitted by: [REDACTED]
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]
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.

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

Document	Policy number	Page no	Policy text / para no.
Part 2 Local Plan	Policy 1: Flood Risk	20	Para 1.4
	Policy 2: Site Allocations		
	Policy 3: Main Built up Area: Policy 3.1	30	Pol 3.1, Para 3.5
	Policy 3: Main Built up Area: Policy 3.2	81	Para 3b.6, 3b.7
	Policy 4: Awwsworth		
	Policy 5: Brinsley		
	Policy 6: Eastwood		
	Policy 7: Kimberley		
	Policy 8: Development of Green Belt		
	Policy 9: Retention of ...employment sites		
	Policy 10: Town Centre ...uses		
	Policy 11: The Square, Beeston		
	Policy 12: Edge of Centre, Eastwood		
	Policy 13: Proposals.....		
	Policy 14: Centre....		
	Policy 15: Housing size, mix and choice		
	Policy 16: Gypsies and Travellers		
	Policy 17: Place-making, design & amenity	111	Pols 1, 2
	Policy 18: Shopfronts....		
	Policy 19: Pollution, Hazardous Substances		
	Policy 20: Air Quality		
	Policy 21: Unstable land		
	Policy 22: Minerals		
	Policy 23: Proposals affecting designated...	124, 125	Para 23.1, 23.2, 23.5
	Policy 24: The health impacts of....		
	Policy 25: Culture, Tourism and Sport	152	Pol 1, 2 Para 25.1
	Policy 26: Travel Plans	153	Para 26.1
	Policy 27: Local Green Space	155	Para 27.5
	Policy 28: Green Infrastructure Assets	157, 158	Pol 1.b, Para 28.2, 28.5
	Policy 29: Cemetery Extensions		
	Policy 30: Landscape		
	Policy 31: Biodiversity Assets		
	Policy 32: Developer Contributions	171	Para 32.1

Policy number	Page number	Policy text / Para number
1 Flood Risk	20	Para 1.4

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

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

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

Your Comments:

Resident's comments:

"There is already serious flood risk in the Erewash Valley at Toton Sidings. Adding new housing in the area will only increase the risk of flash flooding in the area especially nearby houses on Goodwood Road and side roads."

"All housing should have solar panels + rain water harvesting systems built-in."

1. We are seriously concerned with the increased risk of flash flooding that development in and around Toton Sidings will cause. We believe para 1.4 needs to be strengthened to reflect the specific risk in the Sidings due to not being currently defended by flood protection measures
2. A resident has suggested all new housing (and by extension, commercial developments) should have solar panels & rain water harvesting systems incorporated 'by default'. It is not clear where this suggestion should be included in our response but added here following advice by Steffan Saunders on Oct 30th. Solar panels and water harvesting systems clearly have a role to play in reducing carbon dioxide emissions. We would like to see a positive 'Justification' paragraph that encourages the incorporation of these systems where feasible.

Question 4. Modifications sought

[CTTC Forum text in: ***Black bold italic***]

Amend para 1.4 to:

1.4 With regard to point 4 of the policy, flood mitigation will be required in all cases (whether the site is defended or not). Examples of mitigation include flood resistance/resilience measures, emergency planning and good site design that does not increase risk to others. The Environment Agency will also require flood compensation (i.e. at least equivalent replacement of lost flood storage) in areas, ***such as the Erewash Valley at Toton Sidings***, which are not defended by an appropriate standard of flood protection (such as the Nottingham Trent Left Bank Flood Alleviation Scheme).

Create new para to state something along the lines of:

1.n The Council recognises the impacts of Climate Change – as detailed in Aligned Core Strategy Policy 1: Climate Change – and wishes to encourage the reduction of carbon emissions through the installation of renewable energy solutions such as solar panels and rain water harvesting systems in [set % aspiration] of new housing and all new commercial developments.

Policy number	Page number	Policy text / Para number
3.1 Chetwynd Barracks	30	Policy 3.1 / para 3.5

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

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

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

Your Comments:

Residents' comments include:

"[...] Barracks to be treated as one entity and not split up into separate development plots"

"Keep Chetwynd Road [Chilwell] closed." "Chetwynd Road: make it a cycle & pedestrian route only?" "Chetwynd Road to be opened both ends to share new traffic load."

"Keep Hobgoblin wood." "Keep trees on the west side of Barracks - from the quarry upwards."

"All large trees on the Barracks to be the subject of tree preservation orders"

"New feed Road into Depot from Bardills essential (with Tram/Bus/Cycle links?)"

"Re-route Erewash Country trail & public footpath down through the eastern edge of the Barracks site to exploit a newly created green corridor"

"Sports provision needs to be included on the Barracks site to protect current facilities"

"[...] War memorial must be protected and given plenty of space. [...]:"

1. Fourteen residents specifically commented on Chetwynd Barracks – although all comments submitted were, of course, triggered by future developments of the Barracks and HS2 Station.
Some comments were contradictory (opening Chetwynd Road, Chilwell) but this is not surprising given the impact the development of the site will have and the depth of feeling by residents.
2. Specific additions to Policy 3.1 (para 3.5) are therefore sought to strengthen current requirements

Question 4. Modifications sought

[CTTC Forum text in: ***Black bold italic***]

Amend Policy 3.1 (at para 3.5) to:

3.5 The following key development requirements must be met.

Key Development Requirements:

- 500 Homes (within the plan period), 800+ overall.
- ***The Barracks must be treated as one entity and not split up into separate development plots***
- Provide attractive and convenient walking and cycling connections to the proposed HS2 station and to the tram.
- Provide a bus route through the site, ***including access to the site from Chetwynd Road, Chilwell. However, only buses should be given access to the site from this eastern gateway.***
- ***New access road is needed to the site from the north to fall in line with HS2 Growth Strategy***
- Retain and enhance Green Infrastructure corridors around the eastern and northern areas of the site ***including the creation of footpaths and cycle ways***
- Provide a new Primary School within close proximity to the open space at the east of the site.
- Link open space at the east of the site.
- ***Enhance the provision of sports facilities at the south east of the site***
- Retain existing large trees and grass verges and incorporate these into a boulevard approach to the street scene. ***All large trees on the Barracks will be subject to Tree Preservation orders once the site is released***
- Provide public access to the [Listed Memorial](#), ***the associated gardens and all heritage assets (still to be formally registered) on the site***
- Provide public space to the south of the memorial and retain/enhance the existing memorial garden.
- Provide ~~small~~ retail/service centre ***sufficient*** to meet local need along the main through route.
- Provision of small scale employment development.

Policy number	Page number	Policy text / Para number
3.2 Land in vicinity of the HS2 Station at Toton	81	3b.6 & 3b.7

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

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

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

Your Comments:

Residents' comments:

"If residents only parking is introduced, it needs to be at zero cost to residents"

"Size of the depth of the "green corridor" to the south of the boundary and definitive information as to whether this corridor is STRICTLY for wildlife or inclusive of pedestrian access? Further, some categorical assurance as to who will be responsible for the ongoing maintenance of hedges and vegetation?"

"I work between Derby/Notts + London. HS2 + business development in Toton is greatly needed!"

1. Parking by HS2 station users must not overspill into neighbouring residential streets – as detailed in last bullet of para 3b.6. It is suggested that a 'residents only parking' system may be the solution to this issue. However, we need to ensure residents are not disadvantaged by any such scheme.
2. Viable green corridors on the site (especially the southern boundary) must be considered a mandatory requirement of any development proposals – as outlined in para 3b.7. This para needs to be strengthened to include a minimum width of the primary corridor to the southern boundary. The corridor to the northern boundary (south of Stapleford) is less important, given the likely creation of HS2 station access roads, so this can be treated as an 'informal greenspace' corridor.

Question 4. Modifications sought

[CTTC Forum text in: ***Black bold italic***]

Amend para 3b.6 to:**3b.6 Aspirations (*last bullet*):**

- Prevent overspill parking in existing residential areas when the station is operational. This may include Toton to become 'residents only parking' area to mitigate issues with Station/Tram traffic. ***Any such scheme needs to be implemented at zero cost to residents.***

Amend para 3b.7 to:**3b.7 Aspirations (*first bullet*):**

- Extensive multi-purpose interconnected Green Infrastructure routes to be provided to connect areas of growth and existing communities all of which should be of sufficient width and quality to provide attractive and usable links in the following locations:
 - Along the southern boundary of the location north of existing communities of Toton and Chilwell between Hobgoblin Wood in the east and Toton Fields Local Wildlife site in the west. **This will be a significant corridor in the area, and could incorporate both pedestrian and cycle access to HS2 station so needs to be 50 meters wide;**
 - Along the northern boundary of the location south of Stapleford. **This could comprise a narrow, graded tree and shrub roadside corridor to improve screening of the Innovation Village from the A52;**
 - Along the Erewash Canal ***and Erewash River (between Toton Washlands and Stapleford)*** to the west of the location (incorporating flood mitigation on the low lying Sidings part of the site);
 - Along the north/south corridor.....

Policy number	Page number	Policy text / Para number
17. Place-making, design and amenity	111	17.1 & 17.2

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

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

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

Your Comments:

Residents' comments:

"Good broadband internet connections needed."

"Promote more walking/cycle ways (and fewer cars) in new developments"

1. Policy 17.1 would benefit by explicitly stating that provision of high speed broadband must be treated as a core utility in all new developments
2. Policy 17.2 would also be strengthened by a statement encouraging good design for walk ways and cycle ways to and through the site is included in the design and access statement

Question 4. Modifications sought

[CTTC Forum text in: ***Black bold italic***]

Amend Policies 17.1 & 17.2 to:

17.1 For all new development, permission will be granted for development which, where relevant:

...)

m) Enables convenient use by people with limited mobility, ***pedestrians & cyclists;*** and

n) Incorporates ecologically sensitive design, ***including high speed broadband services,*** with a high standard of planting and features for biodiversity; and
...)

17.2 Applicants for housing developments of 10 dwellings or more will be required to submit a design and access statement which includes an assessment of: ***a)*** the proposals against each of the 'Building for Life' criteria (see Appendix 5) ***and b) how the development promotes and encourages walking and cycling through the development.***

Policy number	Page number	Policy text / Para number
23. Proposals affecting designated and non-designated heritage assets	125	Para 23.1, 23.2, & 23.5

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

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

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

Your Comments:

Resident's comment:

"Do not destroy NSFF building at Chilwell end of site. War memorial must be protected and given plenty of space. It means a lot to long term residents like me. 73yrs."

1. Chetwynd Barracks is due to be sold and redeveloped during the period of this Plan. The site has several valuable heritage assets – especially the memorial and associated garden area - to those who lost their lives during WW1, the shell factory explosion.
There are also other significant buildings – a WW1 Nurses Infirmary and the Officers Mess (part) - and there may be others. We need to ensure these assets are: a) formally identified and registered and; b) protected from any applications to develop the site in advance of any registration.
It is not clear who can apply to register these assets – does it need to be the site owner (MoD) or can the Forum apply?
2. There is a strong case to support the creation of a new Conservation Area within the Barracks site covering these buildings, memorial & gardens. The Forum will look to make such an application at the earliest possible time.

Question 4. Modifications sought

[CTTC Forum text in: ***Black bold italic***]

Amend para 23.1 to:

23.1 This policy applies to all heritage assets, including Listed Buildings, Conservation Areas, Scheduled Monuments ***and immediate associated areas (such as green spaces / gardens etc.)*** and non-designated assets of all kinds.

Amend para 23.2 to:

23.2 Heritage Statements should accompany all applications relating to heritage assets. ***Such a statement will be expected from an application to develop Chetwynd Barracks that will cover those heritage assets located on the site but which may not yet have been formally registered. On-site investigations of heritage assets (such as Hill Farm, on the Barracks), prior to any development starting, should be incorporated into statements. All statements*** ~~These~~ should clearly illustrate the nature of the proposals and their effect on the asset. They should refer to relevant sources of local information including [Conservation Area Appraisals](#), the 'Heritage Gateway', relevant literature and paintings, and the Heritage at Risk Register. Attention should be paid to the Borough's notable industrial heritage. Applications which are not directly related to heritage assets but could impact visually on their setting should include a proportionate Heritage Statement.

Amend para 23.5 to:

23.5 The Council will aim to produce Appraisals and Management Plans for all its Conservation Areas and will consider the merits of amendments to Conservation Area boundaries. It will also consider the production of a Local List of non-designated assets, criteria for their identification and/or an associated SPD. The Council will look to work pro-actively with established Civic Societies ***and Neighbourhood Forums*** to aid understanding of the local historic environment.

Policy number	Page number	Policy text / Para number
25. Culture, Tourism and Sport	152	Policy 1, 2 & para 25.1

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

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

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

Your Comments:

Resident's comment:

"Provide astro turf facilities for all-year football"

1. There is a lack of all-weather artificial football pitches throughout the Borough but especially in the south. The Forum has opened discussions with the Notts FA to see how we might work together to develop pitches in the south of the Borough. It will help give a steer to developers if the Local Plan specifically referenced the need for more artificial pitches as well as turf pitches.
2. Chetwynd Barracks has a significant history and it should be recognised and used to enhance the tourism 'offering' in the Borough. By making specific reference to the site in this policy It will help to protect these heritage assets from future development.

Question 4. Modifications sought

[CTTC Forum text in: ***Black bold italic***]

Amend Policies 1 & 2 to:

Development proposals will be encouraged that;

1. Make specific provision for sports pitches, ***including artificial, all-weather '3G' pitches***, that are suitable for a wide age range of users, in particular children's sport.
2. Enhance the tourism offer in association with DH Lawrence, ***the legacy of Chetwynd Barracks (especially relating to the WWI shell factory and associated memorial)***, or the industrial/ pharmaceutical heritage of the Borough.

Amend para 25.1 to:

25.1 The adopted [Playing Pitch Strategy](#) identifies a deficiency in accessible and secured floodlit football turf ***and artificial, all-weather '3G'*** pitches to the Football Association accreditation standard within the Borough (mainly in the south)

Policy number	Page number	Policy text / Para number
26. Travel Plans	153	Para 26.1

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

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

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

Your Comments:

Residents' comments:

"Traffic congestion now is bad. Stapleford lane is so congested could a relief road be put across the depot or around the back of it to ease the congestion on Stapleford Lane please"

"New feed Road into Depot from Bardills essential (with Tram/Bus/Cycle links?)"

"Promote more walking/cycle ways (and fewer cars) in new developments"

"Need regular bus route from Toton to Stapleford into the evenings"

1. The Forum will promote access to the HS2 Hub Station using walk ways, cycle ways and additional bus routes.
We would like to see a new, specific 'Justification' paragraph that states all Travel Plans must include a section on walk ways, cycle ways & and improved public transport (better bus routes; both frequency and extending services into the evenings)
2. Use section 106 money to improve pavements and cycle ways in local vicinity of developments. For instance, consider creating one-way streets in existing Toton streets bordering the HS2 station such as: Woodstock Road, Epsom Road etc. to allow space to create wider pavements & new cycle ways

Question 4. Modifications sought

[CTTC Forum text in: ***Black bold italic***]

Create new Justification para 26.2 to:

26.2 We expect Travel Plans to include specific sections detailing how developments will encourage more walking, cycling and public transport (bus routes both frequency and operating times) to / from and through the sites.

Policy number	Page number	Policy text / Para number
27. Local Green Space	155	Para 27.5

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

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

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

Your Comments:

Residents' comments:

"Keep Hobgoblin wood"

"Keep trees on the west side of Barracks - from the quarry upwards"

1. The Forum intends to submit an application to designate Local Green Space during the development of its Neighbourhood Plan. It will be helpful for the Local Plan to acknowledge this intention so that developers are aware of the need to consult with the community & ensure they include a provision for Green Space in their plans.

Question 4. Modifications sought

[CTTC Forum text in: ***Black bold italic***]

Amend para 27.5 to:

27.5 Further areas of Local Green Space may be designated through forthcoming Neighbourhood Plans. ***We expect to receive an application to designate significant stretches of green infrastructure as Local Green Space within the Toton Strategic Growth Area and Chetwynd Barracks development sites.***

Policy number	Page number	Policy text / Para number
28. Green Infrastructure Assets	157	Policy 1.b & para 28.2

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

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

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

Your Comments:

Residents' comments:

"Provide astro turf facilities for all-year football"

"Re-route Erewash Country trail & public footpath down the eastern edge of the Barracks site"

"Size of the depth of the "green corridor" to the south of the boundary and definitive information as to whether this corridor is STRICTLY for wildlife or inclusive of pedestrian access? Further, some categorical assurance as to who will be responsible for the ongoing maintenance of hedges and vegetation?"

1. Playing Pitches need to specifically include the growing trend for artificial, all-weather '3G' pitches
2. We would like to see new footpaths & cycle ways creating in green corridors inc. a re-routing of the Erewash Valley trail through Chetwynd Barracks.
3. We believe green corridors need to be of a decent, specified width to be consider viable. Otherwise developers will seek to minimise the widths of these corridors for their own purposes. The Notts WT has done research for the Forum 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 etc.
 - 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, cycle ways, 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
 Quadrat Scotland (2002) The network of wildlife corridors and stepping stones of importance to the biodiversity of East Dunbartonshire. [Scottish Natural Heritage Commissioned Report](#)

Question 4. Modifications sought

[CTTC Forum text in: ***Black bold italic***]

Amend Policy 1b) to:

1. 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). These Green Infrastructure Assets are:
 - a) Green Infrastructure Corridors (not shown on the Policies Map);
 - b) Playing Pitches, ***including artificial, all-weather '3G' Pitches;***
 - c) Informal.....

Amend para 28.2 to:

28.2 The corridors that are [.....]. The details of these opportunities for enhancement will depend on the characteristics of the corridors concerned. ***The Council believes corridors must be 50 metres wide to be considered beneficial and viable for wildlife.*** The corridors are detailed in section 6 of the GIS and are shown diagrammatically on the map on page 160 in this Plan. The corridors do not have fixed boundaries and the map on page 160 should not therefore be interpreted rigidly.

Amend para 28.5 to:

28.5 A potential continuation of the Nottingham Canal towpath [.....] should proposals for this emerge in the future. ***With the development of Chetwynd Barracks, the Council intends to exploit a new green corridor planned for the eastern side of the Barracks. It will re-route the Erewash Valley Trail down a new public footpath/cycleway through the corridor, and from there continue the Trail to the Attenborough Nature Centre.*** The Nature Reserves that are referred to in part 1f of the policy include Local Nature Reserves designated by the Council and Nature Reserves managed by Nottinghamshire County Council and Nottinghamshire Wildlife Trust.

Policy number	Page number	Policy text / Para number
32. Developer Contributions	171	Para 32.1

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

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

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

Your Comments:

Residents' comments:

"Schools 3-18? What's the impact on existing LEA Primary schools?"

"If HS2 doesn't happen what funding is available to George Spencer to cover influx of children?"

1. Paragraph 32.1 would benefit by explicitly stating that Section 106 contributions are needed to increase capacity at all levels of education. Developers must acknowledge their obligations to increase provision at secondary schools as well as primary schools. This point is well made in the Infrastructure Delivery Plan (sections 4.51, 4.52, 4.55, pages 19, 20)
2. A new paragraph would be useful to explicitly state that all Section 106 contributions will be directed in the first instance to the Borough wards/town & parish councils affected by developments before other areas in the Borough are considered. This is because it cannot be right that other areas of the Borough benefit from developers' contributions before residents in the immediate vicinity are awarded suitable recompense for the changes to their environment.

Question 4. Modifications sought

[CTTC Forum text in: ***Black bold italic***]

Amend para 32.1 to:

32.1 This policy strikes the appropriate balance between ensuring the infrastructure requirements to make the development acceptable in planning terms are met, at the same time as not compromising the viability of developments. ***It is acknowledged that financial contributions are needed to increase provision of education capacity at secondary schools in key areas of the Borough***

New Justification para 32.2 to:

32.2 All Section 106 contributions will be directed in the first instance to the Borough wards/town & parish councils affected by developments before other areas in the Borough are considered

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	Yes
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

- 1. The CTTC Forum would like the opportunity to explain in more detail the rationale for our suggested modifications to the Examiner. A specific concern relates to paragraph 28.2 and the need to explicitly commit to a specified width of green corridors necessary to assure viability of wildlife. However, we want the opportunity to explain our suggestions across all policies as appropriate.**

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>
--	--

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 District Council
Council Offices
Foster Avenue
Beeston
Nottingham
NG9 1AB

SENT BY E-MAIL AND POST

3rd November 2017

Dear Sir / Madam

BROXTOWE LOCAL PLAN PART 2 PRE SUBMISSION CONSULTATION

Introduction

Thank you for consulting with the Home Builders Federation (HBF) on the above mentioned consultation. The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing. We would like to submit the following representations and in due course attend the Broxtowe Local Plan Part 2 Examination Hearing Sessions.

The scope of the Broxtowe Local Plan Part 2

The Broxtowe Local Plan Part 2 sets out detailed planning policies that will work with the strategic policies set out in the adopted Aligned Core Strategy (ACS) including specific policies for development management and the allocation of non-strategic development sites.

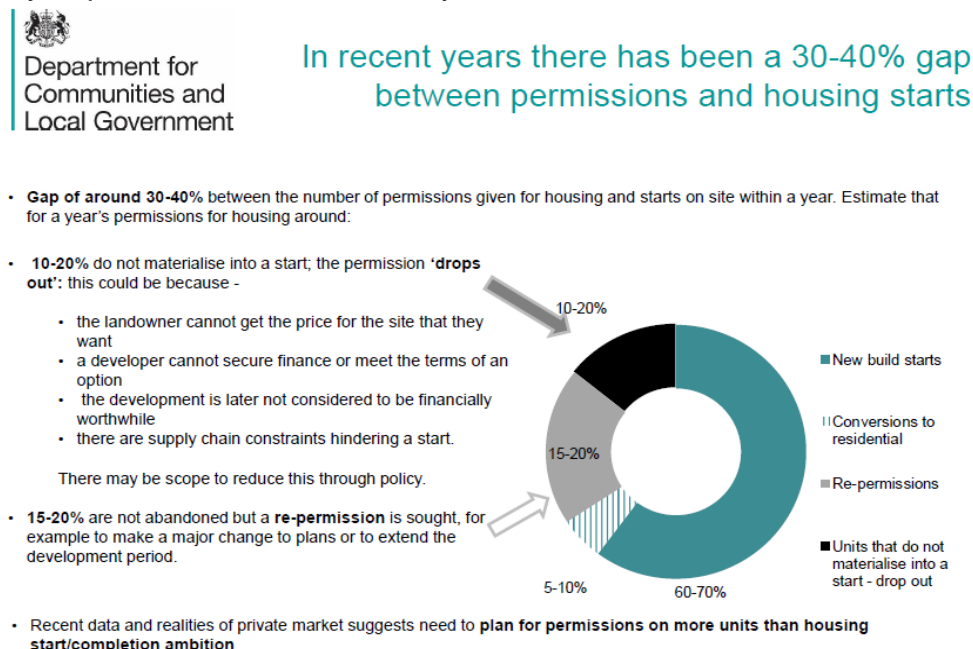
Site Allocation Policies

Overall Housing Land Supply (HLS)

The ACS sets out the overall spatial strategy for the District and this vision is rolled forward in the Local Plan Part 2. The purpose of the Local Plan is to allocate sufficient non-strategic sites to meet the housing requirement of at least 6,150 dwellings for the District to 2028. Accordingly under **Policies 3 – 7 and 11** fifteen non-strategic housing sites are allocated for circa 2,636 dwellings which comprise :-

- **Policy 3** : main built up area site allocations for circa 1,779 dwellings on 8 sites (**Policies 3.1 – 3.8**) ;
- **Policy 4** : Awsworth site allocation for land west of Awsworth for 250 dwellings (**Policy 4.1**) ;
- **Policy 5** : Brinsley site allocation for land east of Brinsley for 110 dwellings (**Policy 5.1**) ;
- **Policy 6** : Eastwood site allocation for 200 dwellings & 30 extra care units (**Policy 6.1**) ;
- **Policy 7** : Kimberley site allocations for 167 dwellings on 3 sites (**Policies 7.1 – 7.3**) ;
- **Policy 11** : The Square Beeston Square for 100 dwellings.

A **housing trajectory** is included in Table 4 in which the Council is showing a HLS of 6,747 dwellings against a housing requirement of 6,150 dwellings. Since the adopted housing requirement is a minimum figure it should not be treated as a maximum ceiling to restrict overall HLS and prevent sustainable development from coming forward. The Council is referred to the DCLG presentation slide from the HBF Planning Conference September 2015 (see below). This slide illustrates 10 – 20% non-implementation gap together with 15 – 20% lapse rate. The slide also suggests “*the need to plan for permissions on more units than the housing start / completions ambition*”. It is acknowledged that this presentation slide shows generic percentages across England but it provides an indication of the level of flexibility within the overall HLS that the Council should be providing. The Council’s contingency of 597 dwellings (9.7%) is below the recommendations of DCLG therefore it is unlikely to provide sufficient flexibility for unforeseen circumstances.



Extract from slide presentation “DCLG Planning Update” by Ruth Stanier Director of Planning - HBF Planning Conference Sept 2015

5 Year Housing Land Supply (YHLS)

The 5 YHLS is a snap shot in time which can change very quickly. The following analysis addresses matters of principle rather than detailed site

specific analysis. The HBF's preferences for the calculation of a 5 YHLS are a Sedgefield approach to shortfalls as set out in the NPPG (ID 3-035) with a 20% buffer applied to both the annualised housing requirement and any shortfall. The Council's latest 5 YHLS calculation is set out in the SHLAA Report 2015/16. The Council has provided calculations using both a Sedgefield / Liverpool approach to shortfalls and 5% / 20% buffers. The Council is proposing Sedgefield and 20% buffer as the most appropriate. The HBF agrees with this proposal. However the Council is not applying the buffer to the shortfall. The HBF disagrees with this approach. The Council is referred to the following :-

- the Warwick Local Plan Examination Inspector's letter dated 1st June 2015 (paragraph 41) ;
- the letter dated 10th August 2015 from the Inspector examining the Amber Valley Local Plan ;
- the West Dorset Weymouth & Portland Joint Local Plan Inspector's Final Report dated 14th August 2015 (paragraphs 85 & 86) ;
- Herefordshire Local Plan Inspector's Final Report dated September 2015 (para 48) ;
- Gloucester, Cheltenham & Tewkesbury Joint Core Strategy Inspector's Interim Report dated 31st May 2016 ;
- Forest of Dean Site Allocations Plan Inspector's Interim Report dated 24 June 2016 ;
- West Somerset Local Plan Inspector's Final Report dated 14 September 2016.

The Council's 5 YHLS calculation using Sedgefield and 20% buffer is only 3.6 years which will be even lower when the buffer is applied to the shortfall as well as the requirement. The Local Plan Part 2 cannot be sound if the Council cannot demonstrate 5 YHLS on adoption of the Plan. Furthermore the 5 YHLS should be maintainable throughout the plan period. As a consequence of not having a demonstrable 5 YHLS policies for the supply of housing in the adopted ACS will also be deemed out of date.

The HBF do not comment on the merits or otherwise of individual sites therefore our representations are submitted without prejudice to any comments made by other parties on the deliverability of specific sites included in the overall HLS, 5 YHLS and housing trajectories. Both the Council's overall HLS and 5 YHLS assumes that all of the allocations in the Plan will be found sound. However, the soundness of individual allocations will be discussed throughout the course of the Examination. If any are found to be unsound these will need to be deleted from the deliverable / developable supply accordingly. It is also essential that the Council's assumptions on lead-in times, lapse rates and delivery rates for sites are realistic. These assumptions should be supported by parties responsible for delivery of housing and sense checked by the Council using historical empirical data and local knowledge.

The small site windfall allowance of 195 dwellings in the 5 YHLS is considered too high. If the windfall allowance is applied throughout 5 year period there is

a risk of double counting in the early years. It is only reasonable to include a windfall allowance in the later years of the 5 YHLS.

It is also noted that the Council has applied an 8% non-implementation allowance in the 5 YHLS but it is unclear if a similar allowance has been applied to the overall HLS.

It is obvious that further site allocations are required to provide a greater overall HLS contingency and a 5 YHLS on adoption of the Plan. Therefore to maximize housing supply the widest possible range of sites, by size and market location are required so that house builders of all types and sizes have access to suitable land in order to offer the widest possible range of products. The key to increased housing supply is the number of sales outlets. The maximum delivery is achieved not just because there are more sales outlets but because the widest possible range of products and locations are available to meet the widest possible range of demand. This approach is also advocated in the Housing White Paper because a good mix of sites provides choice for consumers, allows places to grow in sustainable ways and creates opportunities to diversify the construction sector.

The Council should also consider the allocation of developable reserve sites together with an appropriate release mechanism as recommended by the Local Plan Expert Group (LPEG). The LPEG Report proposed that *“the NPPF makes clear that local plans should be required not only to demonstrate a five year land supply but also 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, as far as is consistent with the policies set out in the NPPF”* (para 11.4 of the LPEG Report).

If further information on HLS becomes available the HBF may wish to submit further comments in written Hearing Statements and during oral discussions at the Examination Hearing Sessions.

Development Management Policies

Policy 15 : House size, mix and choice

If the Local Plan is to be compliant with the NPPF development should not be subject to such a scale of obligations and policy burdens that viability is threatened (paras 173 & 174). The residual land value model is highly sensitive to changes in its inputs whereby an adjustment or an error in any one assumption can have a significant impact on viability. Therefore it is important that the Council understands and tests the influence of all inputs on the residual land value as this determines whether or not land is released for development. The Harman Report highlighted that *“what ultimately matters for housing delivery is whether the value received by land owners is sufficient to persuade him or her to sell their land for development”*.

Bullet Points (1), (2) & (3) propose differential affordable housing provision on allocated and unallocated sites subject to viability. These are :-

- On allocated sites of 10+ dwellings in Awsworth, Bramcote, Brinsley, Stapleford & Toton and any site in the Green Belt 30% or more affordable housing provision ;
- On Kimerley allocated site 20% or more affordable housing provision ;
- On unallocated C2 & C3 sites in sub-markets of Beeston 30% or more, Eastwood 10% or more, Kimberley 20% or more & Stapleford 10% or more affordable housing provision.

The Council should be mindful that the cumulative burden of policy requirements are not set so high that the majority of sites are only deliverable if these sites are routinely rather than occasionally negotiated on the grounds of viability. The Nottingham Core Viability Update Study (September 2013) is now somewhat out of date. As set out in the NPPG (ID 12-014) *“when approaching submission if key studies are already reliant on data that is a few years old they should be updated to reflect the most recent information available”*. The adopted ACS proposed 30% on sites of 15+ dwellings. The Council has provided no new evidence to support the proposals set out in **Policy 15**. There is no up to date evidence justifying the differentials or site thresholds. It is not evidenced that lower site thresholds or C2 sites are viable. The policy is also worded such that these percentage provisions are minimums which should be deleted.

In **Bullet Point (6)** the word “size” should be deleted from the policy title and bullet point so there is no conjecture that the Council is seeking to adopt the Nationally Described Space Standard (NDSS).

Bullet Point (7) proposes that on sites of 10+ dwellings at least 10% of dwellings are Building Regulation M4(2) compliant. The Written Ministerial Statement dated 25th March 2015 stated that *“the optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the NPPG”*. If the Council wishes to adopt the higher optional standards for accessible & adaptable homes the Council should only do so by applying the criteria set out in the NPPG (ID 56-005 to 56-011). All new homes are built to Building Regulation Part M standards so it is incumbent on the Council to provide a local assessment evidencing the specific case for Broxtowe which justifies the inclusion of the optional higher standard of M4(2) for accessible / adaptable homes in its Local Plan policy. If it had been the Government’s intention that evidence of an ageing population justified adoption of M4(2) then the logical solution would have been to incorporate the standard as mandatory via the Building Regulations which the Government has not done. M4(2) should only be introduced on a “need to have” rather than “nice to have” basis.

Bullet Point (8) proposes that on sites of 20+ dwellings the Council will seek at least 5% self / custom build. The HBF supports self and / or custom build in principle for its potential additional contribution to overall housing supply where this is based on a positive policy approach to increase the total amount

of new housing development and to meet an identified and quantified self-build housing need. Such positive policy responses include supporting development on small windfall sites as well as allocating more small sites. It is not evident that the Council has assessed such housing needs in its SHMA work as set out in the NPPG (ID 2a-021) whereby the Council should collate from reliable local information the local demand for people wishing to build their own homes. It is not known the number of people who have registered on the Council's Self Build Register. So there is no publically available evidence to justify the Council's proposed policy approach of seeking self-build plots on all housing sites of more than 20 dwellings. Furthermore the Council has not undertaken any viability assessment of this policy proposal. The NPPG confirms that *"different types of residential development such as those wanting to build their own homes ... are funded and delivered in different ways. This should be reflected in viability assessments"* (ID 10-009). The Council's proposal is a restrictive policy which provides no additionality to land supply but merely changes house construction from one to another type of builder. It is suggested that the Council gives further consideration to the practical workings of **Bullet Point (8)** including the implications on responsibilities under health & safety legislation, working hours, length of build programmes, etc. The Council should also refer to the East Devon Inspector's Final Report dated January 2016 which expresses reservations about the implementation difficulties associated with this sort of policy. In para 46 the Inspector states *"However, I don't see how the planning system can make developers sell land to potential rivals (and at a reasonable price)"*. If self build / custom build plots are not developed the Council has proposed no mechanism by which these dwellings may be developed thereby effectively removing these dwellings from its HLS which is unjustifiable in the current circumstances where the Council cannot demonstrate a 5 YHLS on adoption of the Local Plan Part 2.

Policy 17 : Place-making, design & amenity

Bullet Points (2) & (3) require developments of 10+ dwellings to be assessed under Building for Life 12 and to achieve a score of 9 or more greens. The HBF is supportive of the use of Building for Life 12 as best practice guidance to assist Local Planning Authorities, local communities and developers assess new housing schemes but it should not be included as a Local Plan policy requirement which obliges developers to use this tool. The use of Building for Life 12 should remain voluntary. The reference to Building for Life 12 should be removed from **Policy 17** to the supporting text. The requirement for 9 or more greens is also a misinterpretation of the use of Building for Life 12.

Policy 20 : Air quality

Bullet Point (2) is a vaguely expressed aspiration. It is doubtful if this aspect of the policy can be effectively implemented.

Policy 26 : Travel Plans

Policy 26 and its supporting text are contradictory. The policy requires submission of Travel Plans for all housing sites of 10+ dwellings but the

justification (para 26.1) states the requirement is applicable to only non-allocated sites. Even if the policy is amended to apply explicitly to non-allocated sites Travel Plans should only be required if there is an identified impact to warrant such a requirement.

Policy 27 : Local Green Space

The HBF would question if the proposed Local Green Space designation under **Bullet Point (3)** is appropriate. The area identified on the accompanying map is extensive. This designation could be construed as a re-designation as Green Belt by another name via the back door.

Policy 32 : Developer Contributions

As stated in the NPPF the use of planning obligations should only be considered if it could make unacceptable development acceptable (para 203). Furthermore planning obligations should only be sought which meet all of the tests set out in the NPPF (para 204). It should be clear that any improvements to existing facilities is related to the proposed development and it is not rectifying an existing deficiency.

If any of the above mentioned **Policies** are modified then the HBF may make further comments in Hearing Statements and orally at the Examination Hearing Sessions.

Conclusion

The purpose of the Broxtowe Local Plan Part 2 is :-

- the allocation of non-strategic sites to meet the housing requirement set out in the adopted ACS ;
- the provision and maintenance of a 5 YHLS ;
- the setting out of detailed development management policies.

The Plan is unsound (not positively prepared, unjustified, ineffective and inconsistent with national policy) because the Plan fails to :-

- provide sufficient flexibility in the overall HLS ;
- demonstrate a 5 YHLS on adoption ;
- set appropriate policy requirements in **Policies 15, 17, 20, 26, 27 & 32**.

It is hoped that these representations are helpful in informing the next stage of the Broxtowe Local Plan Part 2. If you require any further assistance or information please contact the undersigned.

Yours faithfully
for and on behalf of **HBF**

[Redacted signature block]

[Redacted signature block]

[Redacted signature block]

**Broxtowe
Borough
COUNCIL**

Please provide your client's name

Title	<div> <div></div> <div></div> <div></div> <div></div> <div></div> </div>
Name	<div></div>
Organisation <small>(if responding on behalf of the organisation)</small>	Beeston Wildlife Group
Address	<div> <div></div> <div></div> <div></div> </div>
Postcode	<div></div>
Tel. Number	<div></div>
E-mail address	<div></div>

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

Please tick here

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

www.broxtowe.gov.uk/part2localplan

Please return completed forms to:

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		
	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: <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

<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>
<p>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:</p> <p>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.</p> <p>It's a haven for wildlife (including notable species) with grassland, mature hedgerows & waterside habitats.</p> <p>It's an easily accessible pocket of 'countryside' between Rylands and new Boots development.</p> <p>It's a locally valued feature, being a small field of naturalised grass surrounded by mature hedgerows.</p> <p>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.</p> <p>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).</p>

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 and is also the last remaining historic flood plain with the possibility of SSSI status due to plants found here nowhere else in the area.

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.**

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.

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**.

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

Document	Policy number	Page number	Policy text/ Paragraph number
Part 2 Local Plan	Policy 1: Flood Risk		
	Policy 2: Site Allocations		
	Policy 3: Main Built up Area Site Allocations		
	Policy 4: Awsworth Site Allocation		
	Policy 5: Brinsley Site Allocation		
	Policy 6: Eastwood Site Allocation		
	Policy 7: Kimberley Site Allocations		
	Policy 8: Development in the Green Belt		
	Policy 9: Retention of good quality existing employment sites		
	Policy 10: Town Centre and District Centre Uses		
	Policy 11: The Square, Beeston		
	Policy 12: Edge-of-Centre A1 Retail in Eastwood		
	Policy 13: Proposals for main town centre uses in edge-of-centre and out-of-centre locations		
	Policy 14: Centre of Neighbourhood Importance (Chilwell Road / High Road)		
	Policy 15: Housing size, mix and choice		
	Policy 16: Gypsies and Travellers		
	Policy 17: Place-making, design and amenity		
	Policy 18: Shopfronts, signage and security measures		
	Policy 19: Pollution, Hazardous Substances and Ground Conditions		
	Policy 20: Air Quality		
	Policy 21: Unstable land		
	Policy 22: Minerals		
	Policy 23: Proposals affecting designated and non-designated heritage assets		
	Policy 24: The health impacts of development		
	Policy 25: Culture, Tourism and Sport		
	Policy 26: Travel Plans		
	Policy 27: Local Green Space	153, 161	Text (3), 27.5 Map
	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	X	
2.2	Compliant with the duty to co-operate	X	
2.3	Sound (please see suggested modifications		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	
It is not effective as it could be with the suggested modification	
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 NEXT PAGE

We consider that the Plan is sound re the Local Green Spaces it includes, but suggest modifications as noted below

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 NEXT PAGE

Please amend 'other' to include additional green spaces in Brinsley –

Land between Church Lane and the Headstocks

Land bounded by Broad Lane, Cordy Lane, Red Lane and the Underwood Boundary

These additions would give added protection to the Green Belt in these areas, which are both important for the wildlife present, and protection to the extensive footpaths around those areas

See map enclosed

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.**

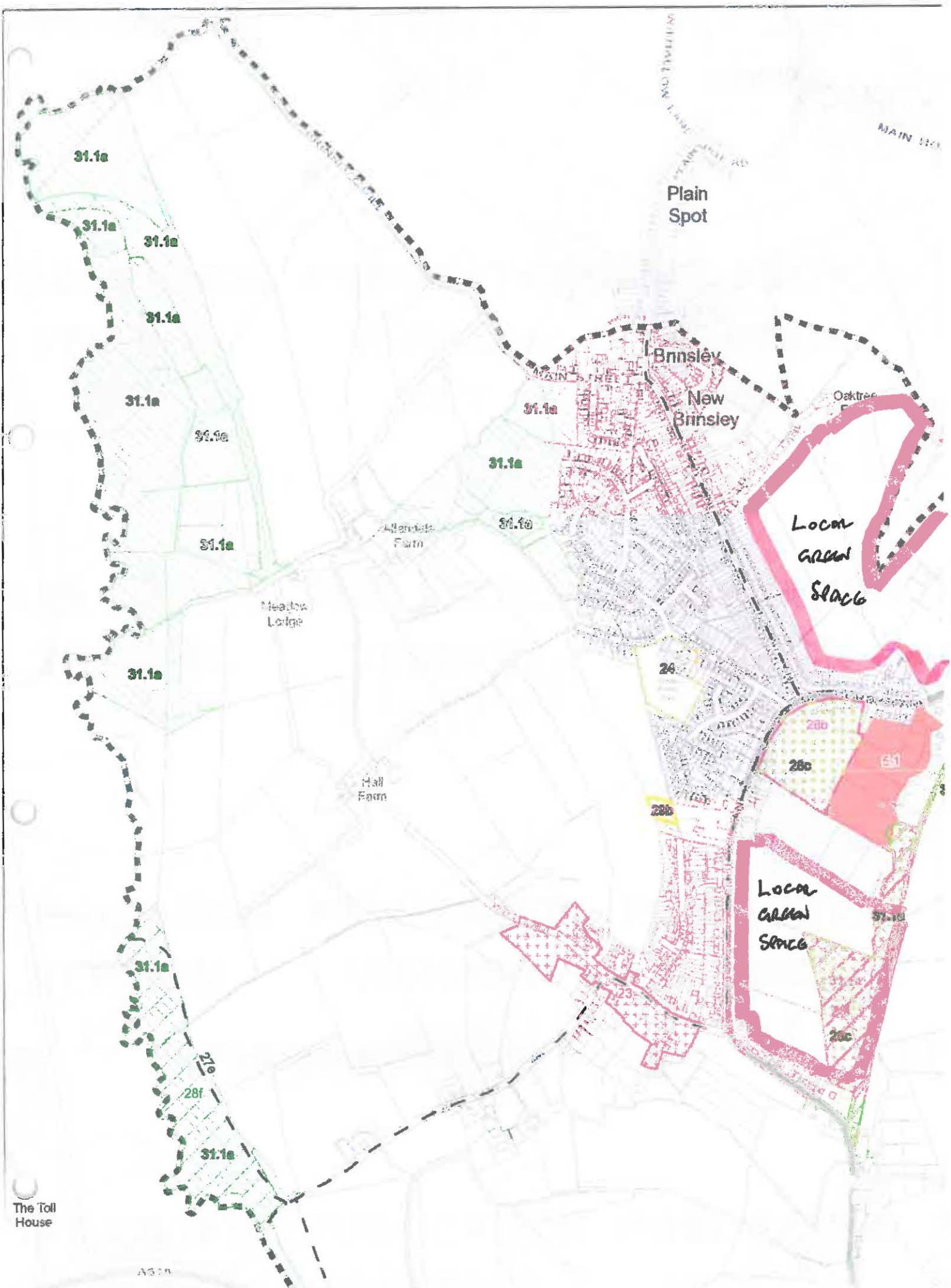
Question 5: Public Examination Attendance

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

X

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



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.



**Nottinghamshire
Wildlife Trust**

Website
www.nottinghamshirewildlife.org

President
Sir Andrew Buchanan Bt.

Registered Charity No.
224168R
A company limited by
guarantee.
Registered in England No.
748865.

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.



**Nottinghamshire
Wildlife Trust**

Website
www.nottinghamshirewildlife.org

President
Sir Andrew Buchanan Bt.

Registered Charity No.
224168R
A company limited by
guarantee.
Registered in England No.
748865.

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.



**Nottinghamshire
Wildlife Trust**

Website
www.nottinghamshirewildlife.org

President
Sir Andrew Buchanan Bt.

Registered Charity No.
224168R
A company limited by
guarantee.
Registered in England No.
748865.

Policy 7.1 Land south of Kimberley Depot

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

Modification sought

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

Policy 7.2 Land south of Eastwood Road Kimberley

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

Modification sought

Site to be excluded.

Policy 17 Place-making, Design and Amenity

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

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

Modification sought

Under n) adding reference to following:

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

Under p) adding a reference to insect houses.

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

Policy 19 Pollution, Hazardous Substances and Ground Conditions

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

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

Policy 27 Local Green Space

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

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

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

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

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

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

References

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



**Nottinghamshire
Wildlife Trust**

Website
www.nottinghamshirewildlife.org

President
Sir Andrew Buchanan Bt.

Registered Charity No.
224168R
A company limited by
guarantee.
Registered in England No.
748865.

- 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**

[Redacted]
[Redacted]
[Redacted]
[Redacted]
[Redacted]
[Redacted]
[Redacted]

Website
www.nottinghamshirewildlife.org

President
Sir Andrew Buchanan Bt.

Registered Charity No.
224168R
A company limited by
guarantee.
Registered in England No.
748865.

Stone Planning Services Limited

Ref: SPS/0086

Date: 3rd November 2017

Planning Services
Broxtowe Borough Council,
Civic Offices.
Foster Avenue,
Beeston,
Nottingham.
NG9 1AB

Dear Sir/Madam,

Representations – Broxtowe Local Plan Part 2

Stone Planning Services Limited acts for Beeston Fields Golf Club and makes representations on its behalf with regard the above.

The proposals map provides for two designations with regard to our client's ownership which is shown on Plan 1 attached. These relate to:

1. Policy 27 2.a) – Local Green Space with regard to all of the golf course; and
2. Policy 31 – Biodiversity Assets with regard to the western part of the golf course.

Local Green Space

As the Council will be aware Beeston Fields Golf Club has occupied the site covered by the existing Beeston Field Protected Open Area for over 90 years. It has been managed by the family and there is no desire to harm its overall character.

The consultation indicates that all of the golf course would be designated as Local Green Space. My client would not support that approach and considers it to be inappropriate and not consistent with the National Planning Policy Framework (NPPF).

Paragraph 77 of the NPPF makes reference to the designation of Local Green Space and states that such a designation would "not be appropriate for most green areas or open space". It then goes on to state that "designations should be used:

- Where the green space is in reasonably close proximity to the community it serves;
- Where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historical significance, recreational value (including playing field), tranquillity or richness of its wildlife; and
- Where the green area concerned is local in character and is not an extensive tract of land."

These are considered in turn.

Where the green space is in reasonably close proximity to the community it serves.

The golf course has very limited unrestricted public access with a single bridle way (BW35) passing from Bramcote Drive to The Chancery; in public access terms it serves a limited community. Hence, the golf course does not serve a close and defined geographical community; it serves a golfing community and patrons travel to the course from a disperse set of geographical communities. In our view the golf course is not in "close proximity to the community it serves".

Stone Planning Services Limited

Just because the land may be visible from adjacent properties that is not justification to designate the area as Local Green Space. Hence, designation would be inconsistent with bullet point 1 of paragraph 77 of the NPPF.

Where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historical significance, recreational value (including playing field), tranquillity or richness of its wildlife.

The space is not 'demonstrably special to a local community'. The golf course does not hold any particular significance. The site is not covered by any national, regional or local heritage, landscape or bio-diversity designation (see below). It holds recreational value for golfers and those attending events in the walled garden; however, there is no broader value in recreation terms. The site is extensive and provides a degree of peacefulness but it is not a 'tranquil' area; it is not designated as a 'tranquil' area in the Development Plan. Lastly, whilst an open area it is surrounded by housing and save for a level of bio diversity one would expect on a site of this scale it is not 'rich' in wildlife. Hence, we strongly consider that designation would be inconsistent with bullet point 2 of paragraph 77 of the NPPF.

Where the green area concerned is local in character and is not an extensive tract of land.

The Local Green Space would cover approximately 60 ha and is far in excess of what could reasonably be acknowledged as being 'local in character'. The golf course is an extensive tract of land. Hence, designation would be inconsistent with bullet point 3 of paragraph 77 of the NPPF.

From the above analysis, it is our view that it would be highly inappropriate to designate Beeston Fields Golf Course as a 'Local Green Space'. Such a policy on this site would be inconsistent with government policy as set out in paragraph 77 of the NPPF. This should be removed from the Plan.

Policy 27 2.a) with regard to Beeston Fields Golf Course is inconsistent with the Framework and in our opinion, would be contrary to paragraph 182 of the Framework and thus unsound.

Notwithstanding our comments above we consider that a blanket policy approach is inappropriate.

The current boundaries of the earlier "Protected Open Area" have remained unchanged, without review, for over 20 years. We cannot see any evidence base to justify the boundaries indicated.

We have appraised the current boundaries and feel that boundary amendments can be justified in two small areas:

- A. Paddocks off Beeston Fields Drive, Clubhouse, Car park and the Walled Garden.
- B. Area to the north of Bramcote Drive

Paddocks off Beeston Fields Drive, Clubhouse, Car park and the Walled Garden - none of this land forms part of the operational open area of the Golf Course. It consists of paddocks and groups of trees off Beeston Fields Drive, Clubhouse building, the main car park, the Walled Garden and immediately associated areas. The character of the land is defined by these functions and differs from the grassed fairways and greens of the Golf Course with its associated belts of trees. The paddocks are in part separated from land to the south by a mature belt of trees and understorey and, in character, they are more closely related to the high quality residential development off Beeston Drive. The Clubhouse and associated car park consist largely of tarmac hard surface and the building, which also differs from the Golf Course.

Stone Planning Services Limited

The Walled Garden is an enclosed garden and leisure development which is separate from the Golf Course both visually and in terms of function and character. Deletion of these areas from the proposed designated area would have no material impact on the role of the Golf Course in terms of Local Green space

Area to the north of Bramcote Drive - this area is also not part of the Golf Course function. It is separated from the Golf Course by a well-established belt of trees. This area consists of a belt of trees immediately to the north of Bramcote Drive together with an area of grassland to the north of this. The tree belt contains a number of trees which are dead and in poor condition. The grassed area does not contain any tees, greens, fairways or other golf features, and therefore differs in its character from the more manicured appearance of the Golf Course itself.

It is considered that the removal of these two small areas of land would not impact on the overall purpose of establishing the Local Green Space. The proposed Local Green Space is approximately 60 ha in area. Approximately 54 ha of land would remain in the Local Green Space. The removal of the two small areas we suggest would not affect the overall character or function of the land.

Notwithstanding the above we firmly believe that none of the site should be designated Local Green Space

Biodiversity Assets

Policy 31 – Biodiversity Assets relates to the western part of the golf course. We are concerned about the justification for this designation and have therefore commissioned RammSanderson Ecology Limited to undertake a Grassland Assessment in that area.

The Executive Summary states:

"RammSanderson Ecology Ltd was instructed by Stone Planning Services Limited to carry out a detailed grassland assessment of Beeston Fields Golf Club. This survey was carried out in order assess the validity of the Local Wildlife Site (LWS) designation for Acidic Grassland Communities, currently in place to the west of the club, based on presence and abundance of LWS qualifying flora species within the site boundary.

The findings of the surveys are summarised below:

- A total of 25 quadrats were assessed throughout the grassland habitats within the site, with quadrats from each community analysed separately.*
- An average of 5.4 species including an average of 1 LWS species were found in each quadrat from the acid grassland communities.*
- An average of 5 species and 0 LWS species were found in the amenity grassland on/around the tees and fairways.*
- A total of 6 LWS species within the golf club, all within the western area of the golf club, with 6 or more criteria species need, this therefore meets the criteria for dry, acidic grassland LWS.*

However, only small pockets of the acidic grassland community detailed in the LWS citation were found within the golf course, with the majority of grassland areas being very regularly, intensively managed, amenity grassland and therefore do not fall within the criteria for classification.

Stone Planning Services Limited

Therefore, as per the published Nottinghamshire LWS boundary rules, flexibility should be used to create a more accurate LWS boundary at the site. If a 1:3 ratio was used it could retain the specific areas in the northwestern section of the golf course as LWS but leave the amenity areas of grassland and majority of the golf course site out of the designation making it much more logical. It would also assist the golf course to carry out targeted management on acid grassland areas identified to be of greater biological importance. The current designation incorporates large areas of amenity land, which leads to confusion and lack of suitable management of the acidic grassland. This would result in an area of approximately 8 hectares of LWS within the golf course boundary.

Based on the current findings, it is recommended that the areas of acidic grassland are retained within the golf course and are managed in line with their specific requirements to increase their botanical interest."

It concluded the following:

"The survey found that the eastern side of the golf course is comprised of amenity grassland (MG7) containing 0 LWS species. As such no further comments in relation to this compartment are made in this report. The results of the NVC assessment confirmed that there are areas of acidic grassland (NVC community U2) dominated by wavy hair grass (Deschampsia flexuosa) within the grounds of the Golf Course. However, these were isolated to small areas in the west 1 compartment, within the less intensively managed 'rough' areas of the golf course. A total of 6 LWS criteria species for lowland dry acidic grassland were identified within the site. A seventh species, sheep's fescue (Festuca ovina) was potentially identified, but not with certainty, due to its vegetative state at the time of survey. Therefore, it was considered that areas of the western side of the site meets the criteria for acid grassland LWS in Nottinghamshire based on the presence of 6 criteria species (with 6 or more required under the criteria).

However, these 6 species were found in very small numbers spread across the western compartments. The highest number of LWS species found in any one quadrat was 3 (Q17, Q18, Q19 and Q21 as per Figure 5). The quadrats within the west 2 compartment to the south only contained 1 LWS criteria species, sweet vernal grass (*Anthoxanthum odoratum*) and whilst this is an LWS dry acid grassland species it is also a common species in a variety of grassland habitats along with the other species recorded in these quadrats. such as white clover (*Trifolium repens*) and common sorrel (*Rumex acetosa*).

*This result indicates that this is a relatively poor-quality acid grassland lacking in species diversity. Very few forb species were found at the time of the survey and whilst this is likely to be in part due to the time of year, where several acidic grassland species would now be either very difficult to find in such a habitat or would be dormant, it also points to a poor sward diversity as some species should still be apparent, vegetatively at this time of year and these were not observed. Given that the LWS criteria species previously found on the site and used to justify the designation also indicate a lack of forb diversity within the grassland. Whilst this is not uncommon in acidic grassland, the grassland species list is still less diverse than good examples of such a habitat where species such as *Potentilla* sp, heath milkwort (*Polygala serpilifolia*) and wild thyme (*Thymus polytrichus*) would be present.*

Whilst the U2 community in itself is not particularly rich in flowering species, under specific management it can be more diverse than that which was present at the time of survey or to transition it to a different acidic grassland community with a more diverse botanical assemblage.

Stone Planning Services Limited

Based on the areas in which the better quality acidic grassland was found, it is recommended that the boundary of the LWS is much reduced, to become more realistic and less confusing to ensure correct management of the better-quality habitats.

The recommended boundary changes are in line with the LWS boundary rules as per the Nottinghamshire. Biological and Geological Record Centre (NBGRC) SINC selection criteria 2007 where flexibility should be applied. Excerpts from the boundary rules section can be found below:

"Below the 25% level we suggest the 1:3 ratio is maintained. This is a very crude rule of thumb, but it does put a sensible limit on the amount of associated LBAP habitat that could be brought into the SINC category. Any LBAP areas outside a SINC designated by these rules would of course be monitored in any event."

"There needs to be some flexibility as well. Where no obvious boundary is present on the ground it makes sense to recognise obvious edges to a site, the top of a rise, the boundary of a surrounding traditionally managed area, a local watershed etc. These will have to be justified site by site."

Traditionally/ Once-Traditionally- Managed Land Parcels

	% of parcel of SINC quality	Minimum standard of remainder of parcel	Area for SINC designation
1	>= 50%	Altered /re-sown/species poor	All parcel notified as SINC
2	<50%	Altered /re-sown/species poor	SINC area + 10m boundary in non SINC remainder designated SINC
3	25-50%	Remainder LBAP quality	All parcel notified
4	<25%	Remainder LBAP quality	SINC area + up to 3x SINC area of LBAOP habitat + 10m boundary. Any remaining LBAP habitat monitored.

Table from NGBG SINC Criteria 2007 document.

As per the boundary rules, if the area between the acid grassland areas were such that the whole current LWS area could be restored/habitat created to bring the LWS in its entirety into a good habitat, then a larger area would be logical. However, the golf course having been in place for 89 years and will never have anything but very high levels of management resulting in very short swards and a lack of species and structural diversity. If the designation is more sensibly delineated, it may lend to a more appropriate approach to conservation management of the acidic grassland areas. The current management of these 'rough' areas is evidently maintaining some of the key acidic grassland species but may have led to a decline in other LWS criteria species originally identified during the designation in 2010. As such some guidance on the management of this habitat type may be useful.

Therefore, either applying the flexibility aspect of the boundary rulings or using the 1:3 ratio based on less than 25% of the area being of LWS criteria habitat (with the remaining habitat not being of LWS or LBAP quality), it is recommended that a more sensible boundary as per Figure 6 is applied to the site. This follows the longer term 'rough' areas and also is in line with the key LWS criteria areas. This allows for the landowners to target management in the correct areas and avoids confusion as to what areas are designated as acid grassland and why."

Stone Planning Services Limited

Our client has also commissioned their agronomist to assess the potential for bio diversity enhancement in the identified area with highest bio diversity (Holes 5, 6 and 7) whilst ensuring the golf course remains operational for golf. Introducing a blanket policy will not achieve any enhancement, working with the owners will.

We therefore consider that the evidence base does not justify the biodiversity designation and should be removed from Policy 31. Furthermore, working with the owners on a Management Plan would achieve the bio diversity objectives set out in the Plan and the Framework. Unnecessary policy designation would not. We object to its designation.

Our clients are willing to work with the Council to develop a Management Plan for sensitive areas that have acidic grassland but that should be out with the policy designation.

In our view the Part 2 Plan – Policies 27 and 31 insofar as they relate to our client's site indicated on Plan 1 are not consistent with the Framework. The Plan is not sound in this respect.

If you require any further information, then do not hesitate to contact me. Please note that we would wish to participate in the Examination.

Yours faithfully

[Redacted Signature]

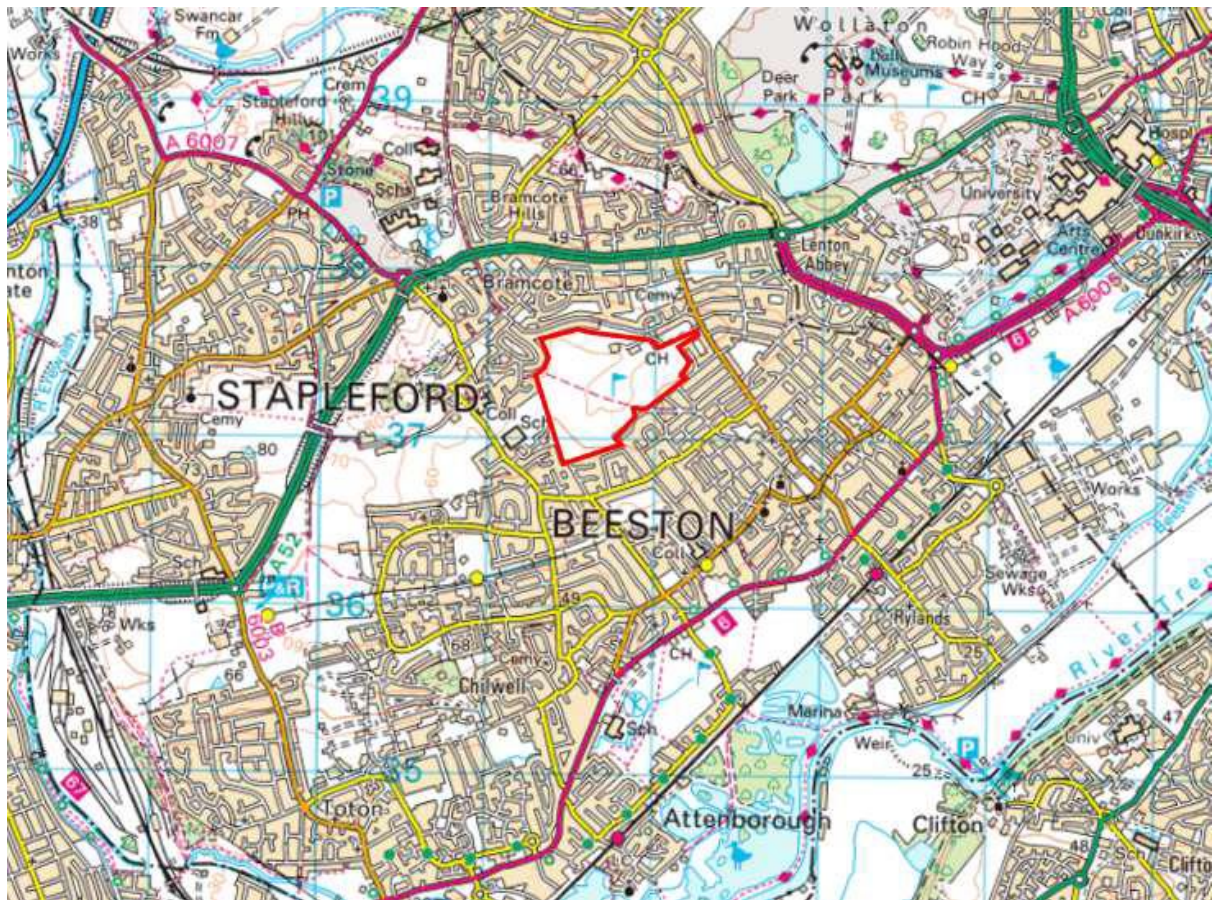
[Redacted Name]

[Redacted Address Line]

Enclosures

1. Plan 1 – Site Location
2. Grassland Assessment – RammSandersson Ecology Limited

PLAN 1 - SITE PLAN



**BEESTON FIELDS GOLF COURSE,
BEESTON**
Grassland Assessment



Client:

Stone Planning Services Ltd

Report Reference:

RSE 1290 01 V1

Issue Date:

October 2017

East Midlands:	West Midlands:	Contact:
Osprey House	Chase View Barn	
		www.rammsanderson.com
		@rammsanderson

Project Details

Client: Stone Planning Services Ltd

Project: Beeston Fields, Golf Course

Reference: RSE_1290_01-V1

Report Title: NVC Grassland Assessment

DISCLOSURE:

The information provided within this report has been prepared and provided as true and in accordance with the Chartered Institute of Ecology and Environmental Management's (CIEEM) Code of Professional Conduct. It is intended for the sole use of the Client and their agents in accordance with the agreement under which our services were performed. Unauthorised communication, reproduction or usage of this report by any party other than the aforementioned is prohibited. No warranty, express or implied, is made as to the advice in this report or any other service provided by RammSanderson Ecology Ltd. This report has been prepared by an ecological specialist and does not purport to provide legal advice. RammSanderson is a trading name of RammSanderson Ecology Limited, as registered in England & Wales (Company No.: 8999992).



Document Control

Originated: **Rhia McBain** BSc (Hons) MCIEEM Senior Ecologist 30/10/2017

Technical Reviewed: **Oliver Ramm** BSc MCIEEM Director 31/10/2017

Issued to Client: **Oliver Ramm** BSc MCIEEM Director 01/11/2017

Revisions:

1 EXECUTIVE SUMMARY

1.1 Background

RammSanderson Ecology Ltd was instructed by Stone Planning Services Ltd to carry out a detailed grassland assessment of Beeston Fields Golf Club. This survey was carried out in order to assess the validity of the Local Wildlife Site (LWS) designation for Acidic Grassland Communities, currently in place to the west of the club, based on presence and abundance of LWS qualifying flora species within the site boundary.

ii The findings of the surveys are summarised below:

- A total of 25 quadrats were assessed throughout the grassland habitats within the site, with quadrats from each community analysed separately.
- An average of 5.4 species including an average of 1 LWS species were found in each quadrat from the acid grassland communities.
- An average of 5 species and 0 LWS species were found in the amenity grassland on/around the tees and fairways.
- A total of 6 LWS species within the golf club, all within the western area of the golf club, with 6 or more criteria species needed, this therefore meets the criteria for dry, acidic grassland LWS.

iii However, only small pockets of the acidic grassland community detailed in the LWS citation were found within the golf course, with the majority of grassland areas being very regularly, intensively managed, amenity grassland and therefore do not fall within the criteria for classification.

iv Therefore, as per the published Nottinghamshire LWS boundary rules, flexibility should be used to create a more accurate LWS boundary at the site. If a 1:3 ratio was used it could retain the specific areas in the north-western section of the golf course as LWS but leave the amenity areas of grassland and majority of the golf course site out of the designation making it much more logical. It would also assist the golf course to carry out targeted management on acid grassland areas identified to be of greater biological importance. The current designation incorporates large areas of amenity land, which leads to confusion and lack of suitable management of the acidic grassland. This would result in an area of approximately 8 hectares of LWS within the golf course boundary.

v Based on the current findings, it is recommended that the areas of acidic grassland are retained within the golf course and are managed in line with their specific requirements to increase their botanical interest.

CONTENTS

1	EXECUTIVE SUMMARY	3
1.1	BACKGROUND	3
2	INTRODUCTION AND BACKGROUND	6
2.1	PURPOSE AND SCOPE OF THIS REPORT	6
2.2	SITE CONTEXT AND LOCATION	7
3	LEGISLATION AND PLANNING POLICY	9
3.1	GENERAL & REGIONALLY SPECIFIC POLICIES	9
4	METHODOLOGY	10
4.1	NVC GRASSLAND ASSESSMENT	10
4.2	DESK BASED ASSESSMENT	10
4.3	LIMITATIONS	10
4.4	ACCURATE LIFESPAN OF ECOLOGICAL DATA	10
5	RESULTS	11
5.1	SURVEYORS	11
5.2	DESK STUDY	11
5.3	NVC GRASSLAND ASSESSMENT	13
6	DISCUSSION & RECOMMENDATIONS	15
7	REFERENCES	18

FIGURES

FIGURE 1: BEESTON FIELDS COMPARTMENT PLAN	6
FIGURE 2: SITE LOCATION PLAN	7
FIGURE 3: SITE CONTEXT PLAN	8
FIGURE 4: BEESTON FIELDS SITE AND LWS BOUNDARIES	12
FIGURE 5: QUADRAT LOCATIONS & LWS QUALIFYING SPECIES AT EACH LOCATION	14
FIGURE 6: RECOMMENDED BOUNDARY AMENDMENT FOR LWS	17

TABLES

TABLE 1: CONSULTED RESOURCES	10
TABLE 2: SUMMARY OF SURVEY CONDITIONS	11

APPENDICES

APPENDIX 1: SPECIES LIST	19
APPENDIX 2: NOTTINGHAMSHIRE LWS SELECTION CRITERIA	22

2 INTRODUCTION AND BACKGROUND

2.1 Purpose and Scope of this Report

- RammSanderson Ecology Ltd was commissioned by Stone Planning Services Ltd. to assess the grassland on the Beeston Fields Golf Club site in relation to the Local Wildlife Site (LWS) designation currently in place for acidic grassland on the western section of the site, and whether the grassland to the east differs from the west.
- ii The site boundary was defined by the boundary sent by the client and drawn from the Broxtowe Local Plan (<http://broxtowe.maps.arcgis.com/apps/webappviewer/index.html?id=2bc67a64432944a3918069616517bbd2> accessed 2017). However, for the purposes of the survey the site was split into the three sections (or compartments) of the golf course, on site the course is separated by a hedge and a PRoW (see Figure 1 below). These compartments were labelled; east, west 1 and west 2. All of compartments West 1 and West 2 are currently under LWS designation (see Figure 4) and are designated as a “golf course containing notable acidic grassland”.

Figure 1: Beeston Fields compartment plan



- iii As shown on the above plan, two areas of the site were not surveyed due to access restrictions at the time of survey. The walled garden contains, as expected, ornamental planting, fruit trees and mown, amenity grassland with greenhouses and assorted buildings. The area to the north of the East compartment were two horse grazing paddocks and were under separate ownership to the golf course and therefore not subject to survey at that time.
- iv This Appraisal is based on a review of the development proposals provided by the Client, desk study data (third party information) and a survey of the Site. The aims of this report are to:

- Discuss the results of an NVC methodology grassland survey of the golf course and the full species list of the site.
 - Evaluate the species diversity and composition present and compare results against the Nottinghamshire County Council Guidelines for the Selection of acid grassland Local Wildlife Sites.
 - Identify any specific ecologically valuable grassland areas to preserve /manage within the golf course.
 - Assess the differences between the species and habitats on the western and eastern section of the golf course.
- v This report pertains to these results only; recommendations included within this report are the professional opinion of an experienced ecologist and therefore the view of RammSanderson Ecology Ltd.
- vi The surveys and desk based assessments undertaken as part of this review and subsequent report are prepared in accordance with the British Standard for Biodiversity Code of Practice for Planning and Development (BS42020:2013).

2.2 Site Context and Location

The site comprises three compartments of a golf course (Beeston Fields Golf Club) which is approximately 43Ha of amenity grassland, semi-improved grassland, scattered trees, broadleaved and mixed woodland, ornamental planting including some ornamental heather beds, scattered scrub and tall ruderal. It lies between the residential areas of Beeston and Bramcote, the two western compartments are separated by a historic Public Right of Way (PRoW) which dates back to before the club house was built as a residential dwelling in 1837. The golf course itself was established in 1927 and therefore the amenity grassland has been in place for decades so has been improved for nearly a century. There is a mature hedgerow separating the eastern and western compartments.

Figure 2: Site Location Plan

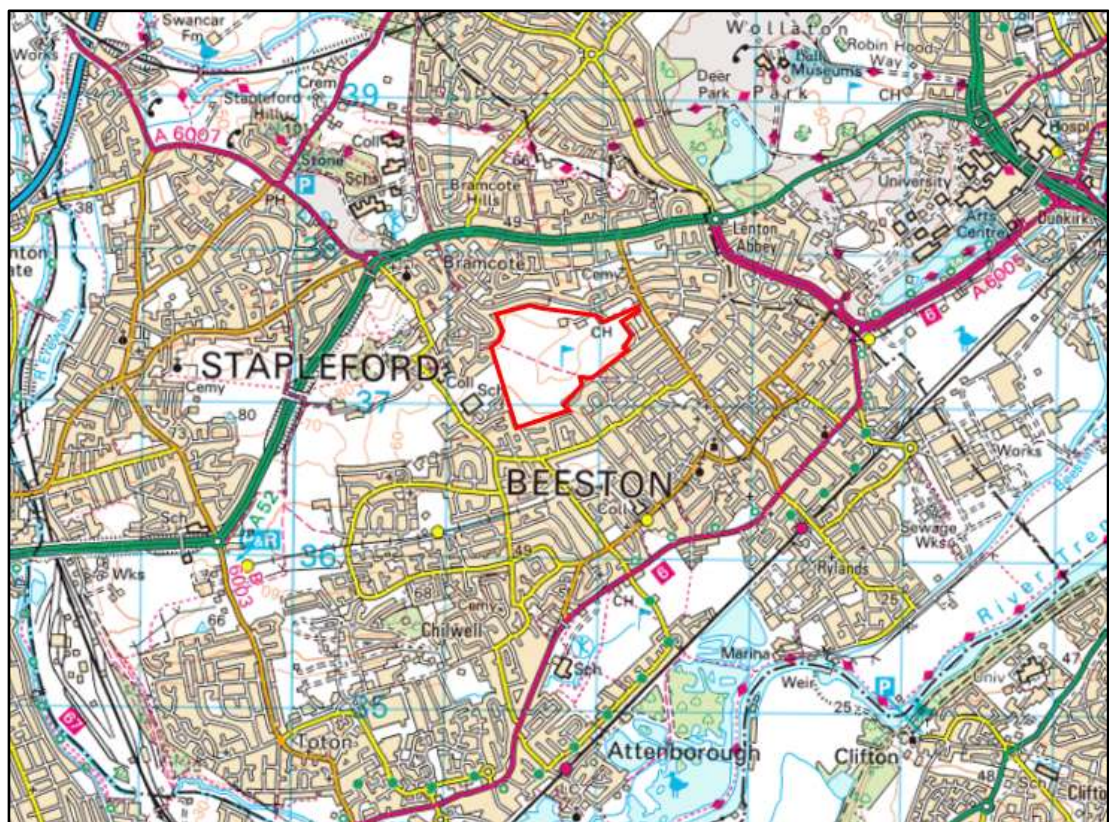


Figure 3: Site Context Plan



© Google 2015, Image reproduced under licence from Google EarthPro

3 LEGISLATION AND PLANNING POLICY

3.1 General & Regionally Specific Policies

Articles of British legislation, policy guidance and both Local Biodiversity Action Plans (BAPs) and the NERC Act 2006 are referred to throughout this report. Their context and application is explained in the relevant sections of this report. The relevant articles of legislation are:

- The National Planning Policy Framework (2012)
- ODPM Circular 06/2005 (retained as Technical Guidance on NPPF 2012)
- Local planning policies (Broxtowe Borough Council)
- The Conservation of Habitats and Species Regulations 2010 (as amended);
- The Wildlife and Countryside Act 1981 (as amended);
- EC Council Directive on the Conservation of Wild Birds 79/409/EEC;
- National Parks and Access to the Countryside Act 1949;
- The Countryside and Rights of Way Act 2000;
- The Hedgerow Regulations 1997;
- The Natural Environment and Rural Communities (NERC) Act 2006;
- Local Biodiversity Action Plan for Nottinghamshire.

4 METHODOLOGY

4.1 NVC Grassland assessment

The site (with the exception of the areas highlighted as no access) was subject to a full National Vegetation Classification (NVC) grassland survey. In this case a 2m x 2m quadrat was used for sampling, with all species within the quadrat and their relative abundances (%) recorded. A total of 25 quadrats were surveyed across the site, with quadrats taken at random as the site was walked. Care was taken to ensure a sampling of as many areas as possible however the site an actively used golf course and as such, fairways, tees and greens could only be sampled occasionally. In addition, a full grassland species list was taken during the site walkover.

4.2 Desk Based Assessment

Data regarding non-statutory designated sites, regarding Beeston Field in particular, was requested from the local ecological records centre and online resources, details of which are provided in Table 1 below.

Table 1: Consulted resources

Consultee/Resource	Data Sought	Search Radius from Boundary
Nottinghamshire Biological and Geological Record Centre	Non-Statutory Site Designations, protected/notable species records	1km

NB: Desk study data is third party controlled data, purchased or consulted for the purposes of this report only. RammSanderson Ecology Ltd cannot vouch for its accuracy and cannot be held liable for any error(s) in these data.

4.3 Limitations

- It should be noted that whilst every effort has been made to provide a comprehensive description of the site, no investigation could ensure the complete characterisation and prediction of the natural environment.
- ii Botanical surveys during the period of October to April are generally less efficient than during the spring or summer, and it is possible that some plant species, especially fine leaved grass species and spring/early summer flowering herbaceous species may have been missed by the field survey. However, in view of the ecological character of the habitats recorded it is considered that the survey is adequate to make a robust assessment of habitats present and the sites likely nature conservation significance.

4.4 Accurate lifespan of ecological data

The majority of ecological data remain valid for only short periods due to the inherently transient nature of the subject. The survey results contained in this report are considered accurate for approximately 2 years, notwithstanding any considerable changes to the site conditions.

5 RESULTS

5.1 Surveyors

The survey was carried out by Rhia McBain BSc (Hons) MCIEEM and Amy Skuce BSc (Hons) GradCIEEM. Rhia has been completing botanical surveys for over 12 years and been an ecology professional for nearly 10 years. Amy has been undertaking botanical assessments for four years, with three years' experience as an ecological consultant. Both are appropriately qualified and experienced to carry out this type of survey.

Table 2: Summary of survey conditions

	Survey 1
Survey type	NVC grassland assessment
Date completed	25/10/17
Temperature	14°C
Wind speed (Beaufort Scale)	2
Cloud cover	3
Precipitation	0

5.2 Desk Study

Beeston Fields Golf Course is a non-statutorily designated site, having been designated as a Local Wildlife Site (LWS), previously Sites of Importance for Nature Conservation (SINCs), in 2010. The site was designated due to the golf course containing an area of notable acid grassland.

ii The site was designated with 9 Nottinghamshire LWS acid grassland criteria species identified as present:

- Early hair grass (*Aira praecox*)
- Sweet vernal grass (*Anthoxanthum odoratum*)
- Wavy hair grass (*Deschampsia flexuosa*)
- Sheep's fescue (*Festuca ovina*)
- Heath bedstraw (*Galium saxatile*)
- Mat-grass (*Nardus stricta*)
- Bird's foot (*Ornithopus perpusillus*)
- Sheep's sorrel (*Rumex acetosella* agg.)
- Slender trefoil (*Trifolium micranthum*)

Figure 4: Beeston Fields Site and LWS boundaries



5.3 NVC Grassland Assessment

The plan overleaf highlights where each quadrat was placed. A total of 25 grassland quadrats were assessed as part of the survey. A total of 6 LWS qualifying species were found, however only a maximum of 3 were ever found in any one quadrat. Therefore, it is considered that the quality of the acidic grassland is relatively poor. However, despite this the criteria are that 6 or more species are identified, this site has therefore met the criteria for dry, acid grassland in Nottinghamshire.

- ii Following NVC best practice, the quadrats were separated into different communities where these were apparent on the ground, preferably taking a minimum of 5 quadrats where possible per community and using a random sampling method. These formed three groups during this survey with the number of quadrats taken in brackets:
 - Amenity / semi-improved mesotrophic grassland community (15),
 - Acidic grassland community (8),
 - Heath community (2).
- iii A total of 14 quadrats found 0 LWS qualifying species across both western and eastern sections of the site.
- iv Only 5 quadrats were taken on the eastern compartment due to the lack of variation in habitats and the larger number of golfers active in this section. This compartment was analysed as MG7a (*Lolium perenne*-*Trifolium repens* leys), this was in keeping with what was apparent on the ground with evidence of low botanical diversity and high levels of amenity management.
- v Of the two western compartments, the northernmost portion of Western 1 compartment had the better quality acidic grassland, with the NVC classification resulting in a best fit of U2 (*Deschampsia flexuosa*, most likely to be U2a- *Deschampsia flexuosa* - *Festuca ovina*-*Agrostis capillaris* community).
- vi The majority of the two western compartments still mostly comprised MG7a community which was present throughout the pathways, fairways and tees.
- vii The heather areas, which were mostly planted beds with several ornamental varieties of *Calluna spp* and *Daboecia sp* also present in the western areas. Despite being ornamental planting these were also assessed under NVC and resulted in an H9d or H2a classification. The H2 classification is considered the most accurate definition due to the presence of gorse just outside the quadrat but within the habitat. The addition of further species after a spring or summer survey would be the best way to ensure a full NVC fit within this habitat type.

Figure 5: Quadrat locations & LWS qualifying species at each location



6 DISCUSSION & RECOMMENDATIONS

- The survey found that the eastern side of the golf course is comprised of amenity grassland (MG7) containing 0 LWS species. As such no further comments in relation to this compartment are made in this report.
- ii The results of the NVC assessment confirmed that there are areas of acidic grassland (NVC community U2) dominated by wavy hair grass (*Deschampsia flexuosa*) within the grounds of the Golf Course. However, these were isolated to small areas in the west 1 compartment, within the less intensively managed 'rough' areas of the golf course. A total of 6 LWS criteria species for lowland dry acidic grassland were identified within the site. A seventh species, sheep's fescue (*Festuca ovina*) was potentially identified, but not with certainty, due to its vegetative state at the time of survey. Therefore, it was considered that areas of the western side of the site meets the criteria for acid grassland LWS in Nottinghamshire based on the presence of 6 criteria species (with 6 or more required under the criteria).
 - iii However, these 6 species were found in very small numbers spread across the western compartments. The highest number of LWS species found in any one quadrat was 3 (Q17, Q18, Q19 and Q21 as per Figure 5). The quadrats within the west 2 compartment to the south only contained 1 LWS criteria species, sweet vernal grass (*Anthoxanthum odoratum*) and whilst this is an LWS dry acid grassland species it is also a common species in a variety of grassland habitats along with the other species recorded in these quadrats. such as white clover (*Trifolium repens*) and common sorrel (*Rumex acetosa*).
 - iv This result indicates that this is a relatively poor-quality acid grassland lacking in species diversity. Very few forb species were found at the time of the survey and whilst this is likely to be in part due to the time of year, where several acidic grassland species would now be either very difficult to find in such a habitat or would be dormant, it also points to a poor sward diversity as some species should still be apparent, vegetatively at this time of year and these were not observed. Given that the LWS criteria species previously found on the site and used to justify the designation also indicate a lack of forb diversity within the grassland. Whilst this is not uncommon in acidic grassland, the grassland species list is still less diverse than good examples of such a habitat where species such as *Potentilla* sp, heath milkwort (*Polygala serpyllifolia*) and wild thyme (*Thymus polytrichus*) would be present.
 - v Whilst the U2 community in itself is not particularly rich in flowering species, under specific management it can be more diverse than that which was present at the time of survey or to transition it to a different acidic grassland community with a more diverse botanical assemblage.
 - vi Based on the areas in which the better quality acidic grassland was found, it is recommended that the boundary of the LWS is much reduced, to become more realistic and less confusing to ensure correct management of the better-quality habitats.
 - vii The recommended boundary changes are in line with the LWS boundary rules as per the Nottinghamshire Biological and Geological Record Centre (NBGRC) SINC selection criteria 2007 where flexibility should be applied. Excerpts from the boundary rules section can be found below;

"Below the 25% level we suggest the 1:3 ratio is maintained. This is a very crude rule of thumb, but it does put a sensible limit on the amount of associated LBAP habitat that could be brought into the SINC category. Any LBAP areas outside a SINC designated by these rules would of course be monitored in any event."

"There needs to be some flexibility as well. Where no obvious boundary is present on the ground it makes sense to recognise obvious edges to a site, the top of a rise, the boundary of a surrounding traditionally managed area, a local watershed etc. These will have to be justified site by site."

Traditionally/ Once-Traditionally- Managed Land Parcels

	% of parcel of SINC quality	minimum standard of remainder of parcel	area for SINC designation
1	>/=50%	altered/ re-sown/ species poor	all parcel notified as SINC
2	<50%	altered/ re-sown/ species poor	SINC area + 10m boundary in non-SINC remainder designated SINC
3	25-50%	remainder LBAP quality	all parcel notified
4	<25%	remainder LBAP quality	SINC area + up to 3x SINC area of LBAP habitat, + 10m boundary . Any remaining LBAP habitat monitored.

Table from NGBG SINC Criteria 2007 document.

- viii As per the boundary rules, if the area between the acid grassland areas were such that the whole current LWS area could be restored/habitat created to bring the LWS in its entirety into a good habitat, then a larger area would be logical. However, the golf course having been in place for 89 years and will never have anything but very high levels of management resulting in very short swards and a lack of species and structural diversity. If the designation is more sensibly delineated, it may lend to a more appropriate approach to conservation management of the acidic grassland areas. The current management of these 'rough' areas is evidently maintaining some of the key acidic grassland species but may have led to a decline in other LWS criteria species originally identified during the designation in 2010. As such some guidance on the management of this habitat type may be useful.
- ix Therefore, either applying the flexibility aspect of the boundary rulings or using the 1:3 ratio based on less than 25% of the area being of LWS criteria habitat (with the remaining habitat not being of LWS or LBAP quality), it is recommended that a more sensible boundary as per Figure 6 is applied to the site. This follows the longer term 'rough' areas and also is in line with the key LWS criteria areas. This allows for the landowners to target management in the correct areas and avoids confusion as to what areas are designated as acid grassland and why.

Figure 6: Recommended boundary amendment for LWS



- x Management of the above acidic grassland areas should include; cutting of the grassland areas to a height of 100-150cm in early June and another cut in late September, allowing for non-dominant species to come through and still allows the flowering and setting seed of key species. This management should be evaluated each year depending on species composition within the sward. All arisings must be removed, or the grassland sward will become nutrient rich and smothered. Use of any soil / grassland improvement product such as lime or sand, fertilisers, pesticides and/or herbicides should be avoided within the acid grassland areas without consulting an ecologist.

- BS 42020:2013 Biodiversity – Code of Practice for Planning and Development 2013: The British Standards Institution.
- ii Clements, D. & Tofts, R., 1992. Hedgerow Evaluation and Grading Systems (HEGS). s.l.:s.n.
 - iii Department of Communities & Local Government, 2012. National Planning Policy Framework, London: DCLG.
 - iv Institute of Ecology and Environmental Management, 2006. Guidelines for Ecological Impact Assessment in the UK. 2nd ed. Winchester: IEEM.
 - v Institute of Ecology and Environmental Management, 2012. Guidelines for Preliminary Ecological Appraisal. 2nd ed. Winchester: IEEM.
 - vi Institute of Environmental Assessment, 1995. Guidelines for Baseline Ecological Assessment. London: E & FN Spon.
 - vii Joint Nature Conservancy Council, 2010. Handbook for Phase 1 habitat survey. Peterborough: JNCC.
 - viii Local Plan Part 2: 2017-2028, Sept 2017. Broxtowe Borough Council.
 - ix <http://broxtowe.maps.arcgis.com/apps/webappviewer/index.html?id=2bc67a64432944a3918069616517bbd2> Accessed October 2017.
 - x Nottinghamshire Biological and Geological Record Centre, 2007. SINC Selection Criteria in Nottinghamshire
 - xi Office of the Deputy Prime Minister, 06/2005. Government Circular: Biodiversity and Geological Conservation - Statutory Obligations and their impact within the planning system. London: ODPM.
 - xii Rodwell, J.S. (ed.) 1991. British Plant Communities. Volume 2. Mires and heath. Cambridge University Press.
 - xiii Rodwell, J. S. (ed.) 1992. British Plant Communities. Volume 3. Grassland and montane communities. Cambridge University Press.
 - xiv Rodwell, J.S. (ed.) 2000. British plant communities. Volume 5. Maritime communities and vegetation of open habitats. Cambridge University Press.

Appendix 1: Species List

Common Name	Scientific Name
Sycamore	<i>Acer pseudoplatanus</i>
Yarrow	<i>Achillea millefolium</i>
Common bent	<i>Agrostis capilla</i>
Bent sp.	<i>Agrostis sp.</i>
Creeping bent	<i>Agrostis stolonifera</i>
Brown bent	<i>Agrostis vinealis</i>
Garlic mustard	<i>Alliaria petiolate</i>
Fly agaric	<i>Amanita muscaria</i>
Scarlet pimpernel	<i>Anagallis arvensis</i>
Cow parsley	<i>Anthiscus sylvestris</i>
Sweet vernal grass	<i>Anthoxanthum odoratum</i>
Daisy	<i>Bellis perennis</i>
Soft brome	<i>Bromus hordeaceus</i>
Brome sp.	<i>Bromus sp.</i>
Heather (ornamental 1)	<i>Calluna spp.</i>
Heather (ornamental 2)	<i>Calluna spp.</i>
Heather	<i>Calluna vulgaris</i>
Bittercress sp.	<i>Cardamine sp.</i>
Mouse ear	<i>Cerastium fontanum</i>
Rosebay willowherb	<i>Chamerion angustifolium</i>
Creeping thistle	<i>Cirsium arvense</i>
Yellow club fungi	<i>Clavuliopsis sp.</i>
Broom	<i>Cytisus scoparius</i>
Heather (ornamental 3)	<i>Daboecia sp</i>
Cock's foot	<i>Dactylis glomerate</i>
Wavy hair grass	<i>Deschampsia flexuosa</i>
Greater willowherb	<i>Epilobium hirsutum</i>
Willowherb sp.	<i>Epilobium sp.</i>

Red fescue	<i>Festuca rubra</i>
Fescue sp.	<i>Festuca sp.</i>
Ash	<i>Fraxinus excelsior</i>
Cleavers	<i>Galium aparine</i>
Heath bedstraw	<i>Galium saxatile</i>
Wood avens	<i>Geum urbanum</i>
Yorkshire fog	<i>Holcus lanatus</i>
Creeping soft grass	<i>Holcus mollis</i>
Holcus sp.	<i>Holcus sp.</i>
Feather moss sp.	<i>Hypnales sp.</i>
Cat's ear	<i>Hypochaeris radicata</i>
Narrow leaved everlasting pea	<i>Lathyrus sylvestris</i>
Hawkbit sp.	<i>Leontodon sp.</i>
Perennial rye grass	<i>Lolium perenne</i>
Wood rush sp.	<i>Luzula sp.</i>
Black medick	<i>Medicago lupulina</i>
Mat grass	<i>Nardus stricta</i>
Ribwort Plantain	<i>Plantago lanceolate</i>
Hoary plantain	<i>Plantago media</i>
Timothy grass	<i>Phleum pratense</i>
Annual meadow grass	<i>Poa annua</i>
Smooth meadow grass	<i>Poa pratensis</i>
Rough meadow grass	<i>Poa trivialis</i>
Self heal	<i>Prunella vulgaris</i>
Oak	<i>Quercus robur</i>
Creeping buttercup	<i>Ranunculus repens</i>
Common sorrel	<i>Rumex acetosa</i>
Sheep's sorrel	<i>Rumex acetosella</i>
Broad leaved dock	<i>Rumex obtusifolius</i>
Ragwort	<i>Senecio jacobaea</i>

Chickweed

Stellaria media

Dandelion

Taraxacum officinale agg.

White clover

Trifolium repens

Gorse (Ornamental)

Ulex sp.

Thyme leaved speedwell

Veronica serpyllifolia

Vetch sp.

Vicia sp.

Appendix 2: Nottinghamshire LWS Selection Criteria

xx Taken from <https://www.nottinghamcity.gov.uk/events-markets-parks-and-museums/parks-and-open-spaces/nottinghamshire-biological-and-geological-record-centre-nbgrc/> October 2017, LWS previously referred to as SINC (Sites of Importance for Nature Conservation).

Details

Agent	
Please provide your client's name	Beeston Fields Golf Club
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?	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.)
27: Local Green Space		See attached			

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	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>See attached</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>To delete Beeston Fields Golf Club from the list of Local Green spaces set out in the policy</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 explain our client's case to the inspector and challenge the Council regarding its designation.</p>

Broxtowe Part 2 Local Plan



Broxtowe
Borough
COUNCIL

Agent

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

Your Details

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

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

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

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

Please tick here

☐

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

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

www.broxtowe.gov.uk/part2localplan

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

Please return completed forms to:

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

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

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

Document	Policy number	Page number	Policy text/ Paragraph number
Part 2 Local Plan	Policy 1: Flood Risk		
	Policy 2: Site Allocations		
	Policy 3: Main Built up Area Site Allocations		
	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 and 15	Policy 27.3
	Policy 28: Green Infrastructure Assets		
	Policy 29: Cemetery Extensions		
	Policy 30: Landscape		
	Policy 31: Biodiversity Assets		
	Policy 32: Developer Contributions		
Policies Map			
Sustainability Appraisal			
Other (e.g. omission, evidence document etc.)			

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

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

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

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

Your comments

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

Policy 27 proposes the designation of a number of areas of land as Local Green Space. Land to the east and west of Coventry Lane, Bramcote is one of the proposed areas of Local Green Space. Map 61 on page 156 shows the proposed area of local green space extending to include the Gospel Hall and adjoining land.

The inclusion of the Gospel Hall Trust land in the proposed designation is not justified and the Publication version of the plan is therefore unsound. We have made separate representations to Policy 3.3 proposing the inclusion of the Gospel Hall Trust land in the proposed housing allocation.

As the Publication Plan notes, the National Planning Policy Framework (NPPF) is clear that Local Green Space designation will not be appropriate for most green areas or open space and should only be used where;

- the green space is in reasonably close proximity to the community it serves;
- the green area is demonstrably special to a local community and holds a particular local significance because of its beauty, historic significance, recreational value, tranquillity or richness in wildlife; and
- the area is local in character and not an extensive tract of land.

The Gospel Hall Trust land clearly does not meet the criteria for designation as part of the proposed area of Local Green Space. The land is previously developed consisting of the Gospel Hall and associated parking and is not publicly accessible.

It is assumed that the designation is a result of the fact that the land has been inappropriately omitted from the proposed residential allocation to the north (Policy 3.3). We have made a separate representation proposing an amendment to Policy 3.3 to include the Gospel Hall Trust land within the proposed housing allocation.

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.

Map 61 and the Proposals Map should be amended to remove the Gospel Hall Trust land from the proposed 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.**

Question 5: Public Examination Attendance

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

Yes, I wish to participate at the public examination

✓

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

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

Given the Gospel Hall Trust's interest in part of the land proposed for designation as a Local Green Space, it is important that the Trust is represented at the public examination.

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

Guidance Note:

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

'Legally Compliant':

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

‘Compliant with the Duty to Co-operate’:

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

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

‘Sound’

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

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

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

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

Agent

Please provide your client's name	Crampin, Barden and Scott
-----------------------------------	---------------------------

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

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		
	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	
	Policy 28: Green Infrastructure Assets		
	Policy 29: Cemetery Extensions		
	Policy 30: Landscape		
	Policy 31: Biodiversity Assets		
	Policy 32: Developer Contributions		
Policies Map	South (Bramcote)		
Sustainability Appraisal			
Other (e.g. omission, evidence document etc.)	Extent of designation – see plan		

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.

Justified: Replacement of LP policy E13 'Prominent Areas for Special Protection' with a Local Green Space designation is inappropriate in the case of Burnt Hill, as it is too large at 30 hectares (and nearly 50 hectares with the contiguous Windmill Hill). To function as Local Green Space and the landscape protection functions of E13 could reasonably be achieved with other policy.

Positively prepared: LVIA (enclosed) has demonstrated that the land is developable without landscape impact and would enable safe public access and protection of the woodland and the wider green belt. This would meet housing and green infrastructure objectives in ACS Policies 2 and 16 and NPPF paragraph 81. The draft Plan meets neither and would prevent this.

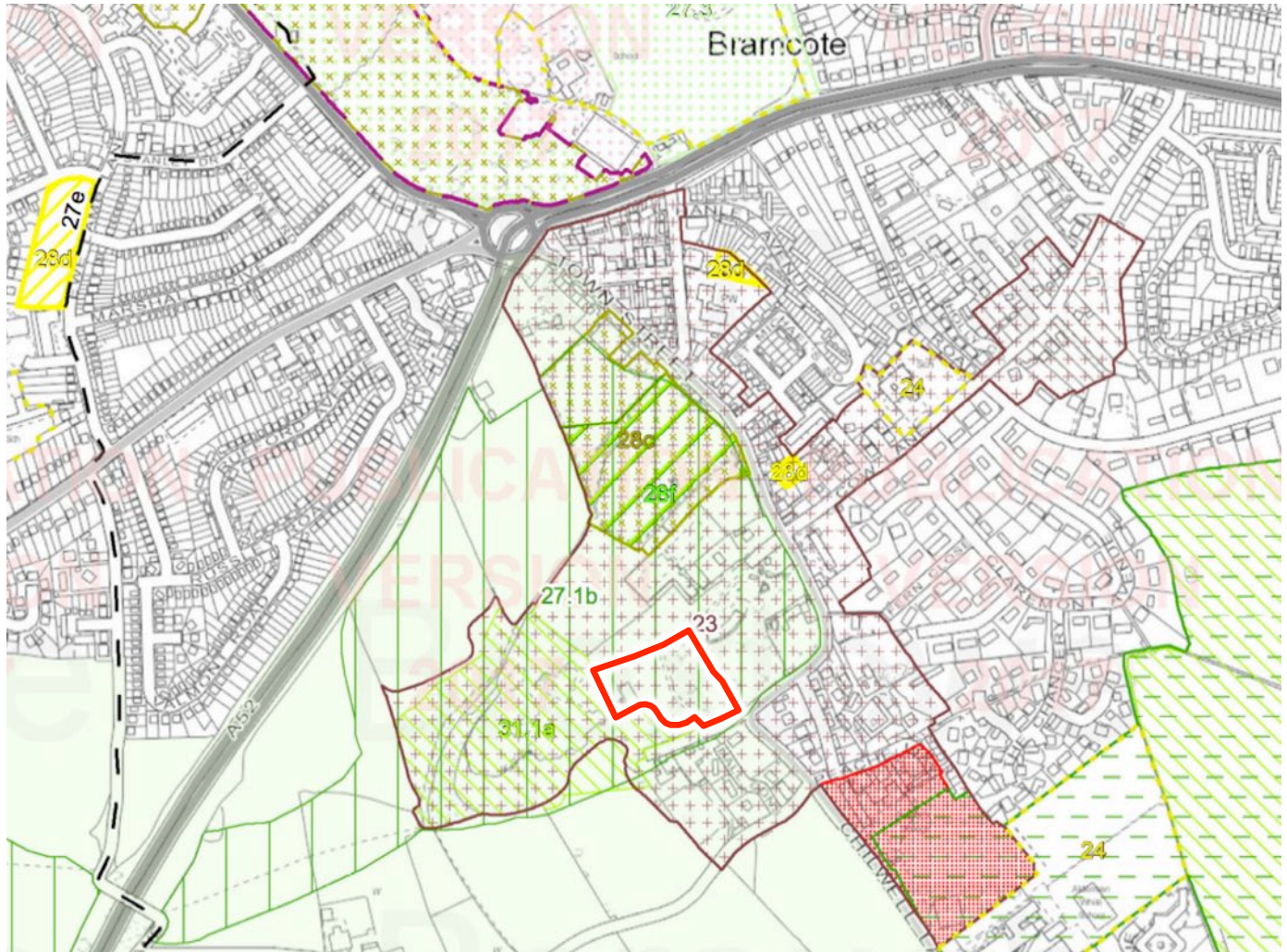
Effective: A detailed design and access, to which the local planning authority made no objection on previous submission, exists for limited development of the site, which is therefore deliverable. Designation as Informal Open Space under draft Policy 28 (1c) may be more appropriate as it would allow the green infrastructure benefits of development to be realised without harm.

Consistent: NPPF paragraph 77 states that the Local Green Space designation will not be appropriate for most green areas or open space and should only be used where the green area concerned is not an extensive tract of land. As the designation is 30 hectares in area, it is not local in character and the subject part that is local could be designated Informal Open 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.

Amend the Policies Map to remove land outlined red on the plan below from 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

Because it may be necessary to discuss the merits and consequences of, and alternatives to designation in more detail and to discuss the impact of residential development of the site, in particular by reference to the submitted Landscape and Visual Impact Assessment (LVIA).

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 Borough Council
Lawrence Avenue
Eastwood
NG16 3LD

By email to: policy@broxtowe.gov.uk

Dear Sir or Madam,

Re: Broxtowe Local Plan Part 2

Gladman Developments Ltd. (hereafter referred to as "Gladman") has considerable experience in the development industry across a number of sectors including residential and employment land. This letter provides the response of Gladman to the current consultation held by Broxtowe Borough Council (BBC) on the Local Plan Part 2 (LPP2).

The LPP2 will help to deliver housing required in Broxtowe over the plan period. To ensure this is achieved, the Plan should distribute housing to a range of sites that will distribute housing to a range of sites that will **support the Plan's strategy**, provide sustainable locations for development and ensure housing is delivered. To address situations where housing does not come forward as expected, the LPP2 should ensure that it allows for flexibility in order to ensure a five year supply of deliverable housing sites can be maintained over the course of the plan period.

Local Plan Part 1

The Local Plan Part 1 (LPP1) specifies the overall spatial strategy for growth and allocates strategic sites. As well as the spatial strategy it sets the housing requirement for the borough. Whereas the emerging LPP2 is intended to deal with non-strategic allocations and more detailed development management policies.

Local Plan Part 2

Site Allocations

In allocating sites the Council should be mindful that to maximize housing supply the widest possible range of sites, by size and market location are required so that house builders of all types and sizes have access to suitable land in order to offer the widest possible range of products. The key to increased housing supply is the number of sales outlets. Whilst some SUEs may have multiple outlets, in general increasing the number of sales outlets available means increasing the number of housing sites. So for any given time period, all else been equal, overall sales and build out rates are faster from 20 sites of 50 units than 10 sites of 100 units or 1 site of 1,000 units. The maximum delivery is achieved not just because there are more sales outlets but because the widest possible range of products and locations are available to meet the widest possible range

of demand. In summary a wider variety of sites in the widest possible range of locations ensures all types of house builder have access to suitable land which in turn increases housing delivery.

Five year housing land supply

The Council must ensure that it is able to demonstrate a rolling five year housing land supply over the plan **period in order to be compliant with the Framework and meet fully the needs of the Borough's communities** and support the economic prospects of the wider area. It is important that the Council uses realistic delivery rates in its housing land supply. On average, annual delivery rates should be in the region of around 30 dwellings per annum per developer acting on site.

Gladman are of the view that the housing land supply calculation for Broxtowe Borough should include a 20% buffer to take into account the previous persistent under-delivery of housing within the borough. The Council should also plan to ensure that any shortfall is made good within the first 5 years of the plan in line with the PPG¹. Based on the Council's latest 5 year housing land supply assessment (5YHLS) the Council is only able to demonstrate 3.6 years. However, the approach advocated by the Council is inappropriate, the buffer should be applied to the annual requirement after the undersupply since the start of the plan period has been added. As such, this would further reduce the Council's **housing** land supply position.

In light of the above it is evident that additional housing land is required to ensure that upon adoption of the Plan the Council is able to demonstrate a robust 5YHLS position.

Policies

Policy 15: Housing Size, Mix and Choice

The above policy seeks to impose the optional technical standards for new homes as set out in the 2015 Written Ministerial Statement. The Council should ensure that it is able to demonstrate robust evidence on viability and whether this is actually achievable across the entire plan period and its consideration on viability of the Plan as a whole in terms of delivering the above policy and what effects it may have on other elements of the policy 15 i.e. the provision of affordable housing.

Further, it is noted that the above policy also seeks to secure at least 5% of housing above 20 dwellings to be in the form of serviced plots for self-build development. In this regard, whilst the government is committed to increasing home ownership through a variety of means such as the provision of starter homes, it is important that the Council is able to demonstrate robust evidence of need which is notably lacking from the Council's **SHMA**.

Notwithstanding the above, Gladman take this opportunity to point out that the provision of starter homes should nonetheless be considered equivalent to the provision of affordable housing and not in addition to. This is quite clearly the Government's intention and is intended to be reflected through amendments to the definition of affordable housing contained in the Framework.

Policy 17: Place-making, Design and Amenity

Whilst noting the importance of design, Gladman do not consider that it is appropriate to place a mandatory **requirement on all sites of 10 or more dwellings to be required to score 9 or more 'greens' in the Building for Life 12 or equivalent**. The reason for this is that some developments may not be able to meet certain criteria simply due to their location or site characteristics. As such, this policy could have the negative consequence of stifling future development opportunities.

Policy 22: Minerals

¹ PPG Reference ID: 3-035-20140306

The above policy appears to be overly onerous and seeks to prevent development from sterilizing mineral resources to meet longer term need. Paragraph 143 of the Framework states that in preparing local plans, local planning authorities should set out policies to encourage the prior extraction of minerals, where practicable and feasible, if it necessary for non-mineral development to take place. Gladman acknowledge the importance of mineral assets, but is of the view that the local policy framework that relates to this must clearly set out that this will be suitably balance against competing development needs rather than a blanket approach that would seek to prevent the delivery of sustainable growth opportunities.

Policy 23: Proposals affecting designated and non-designated heritage assets

This policy relates to all heritage assets according to their significance. This policy should go further so that it recognises that there are two separate balancing exercises which need to be undertaken for designated and non-designated heritage assets. Paragraph 132 – 134 of the Framework relate specifically to designated heritage assets and highlight that the more important the asset the greater the weight that should be attached. Paragraph 135 of the Framework relates specifically to non-designated heritage assets and the policy test that should be applied in these instances is that a balanced judgment should be reached having regard to the scale of any harm and the significance of the heritage asset.

Policy 27: Local Green Space

Paragraph 77 of the Framework sets out the following in terms of when it is appropriate or not to designated land as Local Green Space (LGS). It states that:

“The Local Green Space designation will not be appropriate for most green areas or open space. The designation should only be used:

- Where the green space is in reasonably close proximity to the community it serves;
- Where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquility or richness of its wildlife; and
- Where the green area concerned is a local in character and is not an extensive tract of land.” (emphasis added)

The PPG provides further guidance on the designation of LGS and states:

“There are no hard and fast rules about how big a Local Green Space can be because places are different and a degree of judgment will inevitably be needed. However, paragraph 77 of the National Planning Policy Framework is clear that Local Green Space Designation should only be used where the green area concerned is not an extensive tract of land. Consequently, blanket designation of open countryside adjacent to settlements will not be appropriate. In particular, designation should not be proposed as a ‘back door’ way to try to achieve what would amount to a new area of Green Belt by another name.” (emphasis added)

In light of the above, Gladman question the justification of introducing the LGS as defined on map 61 which appears to be an extensive tract of land and therefore does not meet the tests required by the Framework.

Conclusions

Gladman have highlighted a number of concerns through these representations. This includes the lack of non-strategic allocations and the inconsistent approach with regards to several policies with the requirements of the Framework. Gladman believe that further allocations are required to ensure the borough’s housing needs are met in full and that an appropriate trigger mechanism is required to ensure that remedial action will be taken should monitoring indicate that the Plan is not enabling the level of development that is required to meet the needs of the area.

Gladman also take this opportunity to request that we are afforded the opportunity to participate at the public hearing sessions at the Examination in Public to discuss the issues raised.

Yours faithfully,

[REDACTED]

Broxtowe Part 2 Local Plan



Agent

Please provide your client's name

Your Details

Title	Mr Mrs <u>Miss</u> Ms Other:
Name	MARION WALLWORK
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 would like to be contacted by the Planning Policy Team regarding future consultations.

Please tick here



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

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

www.broxtowe.gov.uk/part2localplan

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

Please return completed forms to:

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

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

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

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

Question 4: Modifications sought

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

Policy 18

I do not believe there should be any more building on Green Belt sites. New building should be on brown field sites.

Policy 18

There should be much stricter controls on shop fronts, fascias, and advertisements

Policy 27

All existing local green space should be protected. And new building developments should always include green space and tree planting

Policy 15

Housing development needs to include social housing

Policy 19

Fracking should not be allowed because of inherent dangers in ground stability and in water contamination.

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

Details

Agent	
Please provide your client's name	
Your Details	
Title	Mr
Name	Alan Beale
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.)
27: Local Green Space					

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	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>You are turning green spaces into narrow corridors and the existing green spaces are significant in size. Your plans are to reduce the size of these and to turn them into narrow manicured corridors</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>You need to reflect on how wildlife corridors can be maintained and not cut back by your new plans</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

POLICY 27

154-156

Agent

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

Your Details

Title	Mr Mrs Miss Ms Other
Name	DAVID PEARSON
Organisation (If responding on behalf of the organisation)	
Address	[REDACTED]
Postcode	[REDACTED]
Tel. Number	[REDACTED]
E-mail address	[REDACTED]

Broxtowe Borough Council
Planning & Community Development

- 3 NOV 2017

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

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

If you <u>would like</u> to be contacted by the Planning Policy Team regarding future consultations.	
Please tick here	<input checked="" type="checkbox"/>
Please help us save money and the environment by using email 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		
	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	154-155	
	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.

Policy 27: One Page only, merely re-iterates the Core Strategy. No thought, justification has been given to this policy.

Para 3: Already referred to in comments on earlier policies, no real consideration of local green space.

There is nothing on this page that indicates a policy.

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.

There needs to be a wider consultation with various bodies with regard to what should happen with green space in the area e.g. environment agency etc.

There is no evidence that this has been done or that there is a "real policy" on Local Green Space.

There needs to be a policy; which is not evident in this document.

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

Question 5: Public Examination Attendance

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

Yes, I wish to participate at the public examination



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

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

I have great concerns that there is no evidence with regard to consultation with agencies, local residents etc. in compiling this "policy".
I wish to put forward Stapleford residents' concerns with regard to local Green Space, which as far as I can see has not been sought out or taken into consideration.
Evidence for this is one page of quotations from Core Strategy & NPPF, + list of areas.
Policy 27 is not a policy that has been considered.

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

Details

Agent	
Please provide your client's name	
Your Details	
Title	Mr
Name	Sheldon Zlotowitz
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?	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>
---	---

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>

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]

Broxtowe Part 2 Local Plan



Broxtowe
Borough
COUNCIL

Agent

Please provide your client's name

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	Alynis Harris
Organisation (if responding on behalf of the organisation)	
Address	[Redacted]
Postcode	[Redacted]
Tel. Number	[Redacted]
E-mail address	[Redacted]

Broxtowe Borough Council
Planning & Community Development

- 3 NOV 2017

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

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

☐ 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	38, 39	POLICY 3-5 PARAS 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 paras.
	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.

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.*

Question 4: Modifications sought

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

* Please see attached sheet.

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'.

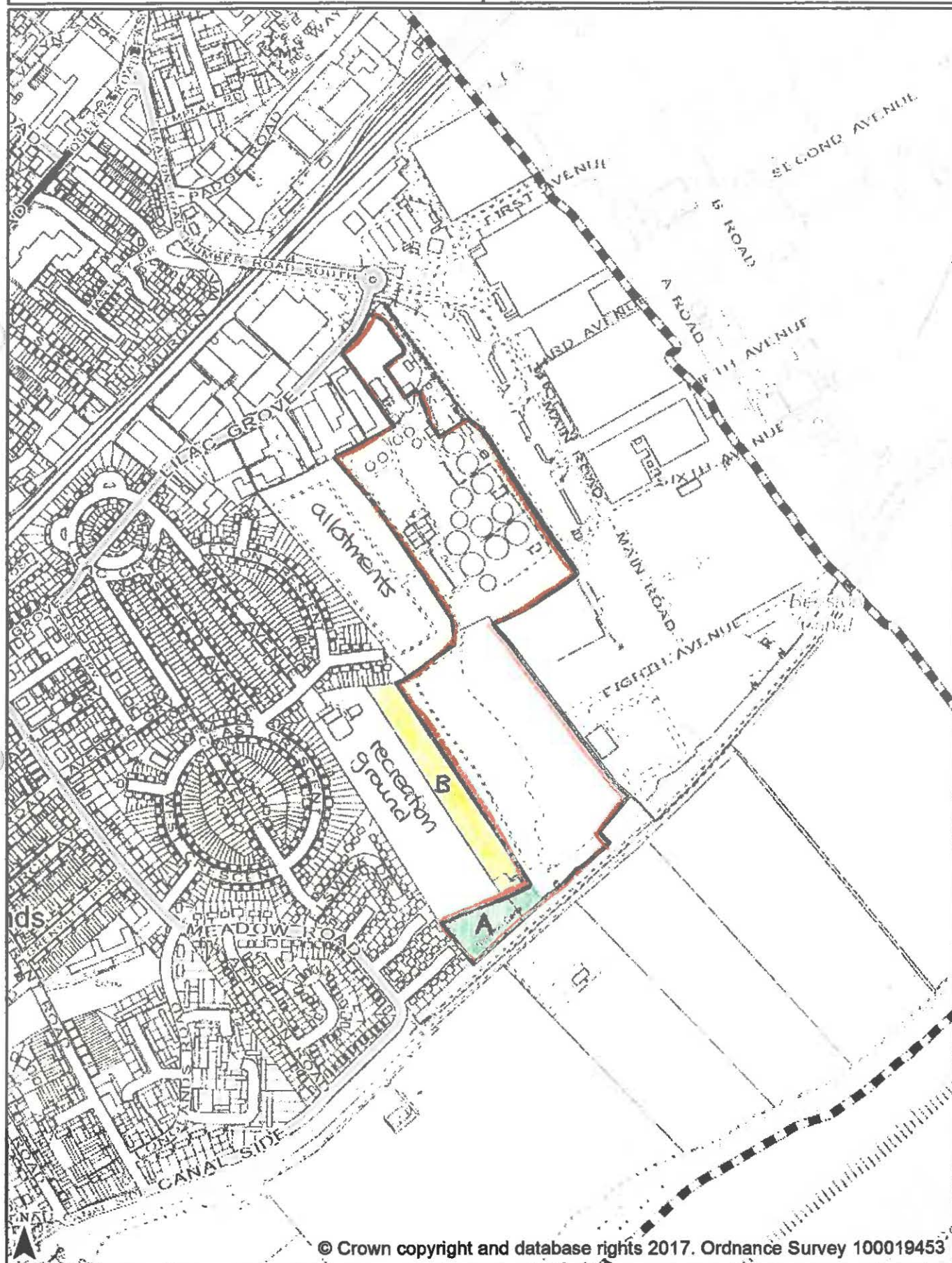
To meet the 'Test of Soundness', the independent Planning Inspector is required to consider whether or not our Local Plan is '**justified**', '**effective**', has been '**positively prepared**', and is '**consistent with national policy**'. You may wish to consider the following before making a representation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



2.1
2.2
2.3
2.4



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).

QUESTION 4 (Modifications continued)

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:

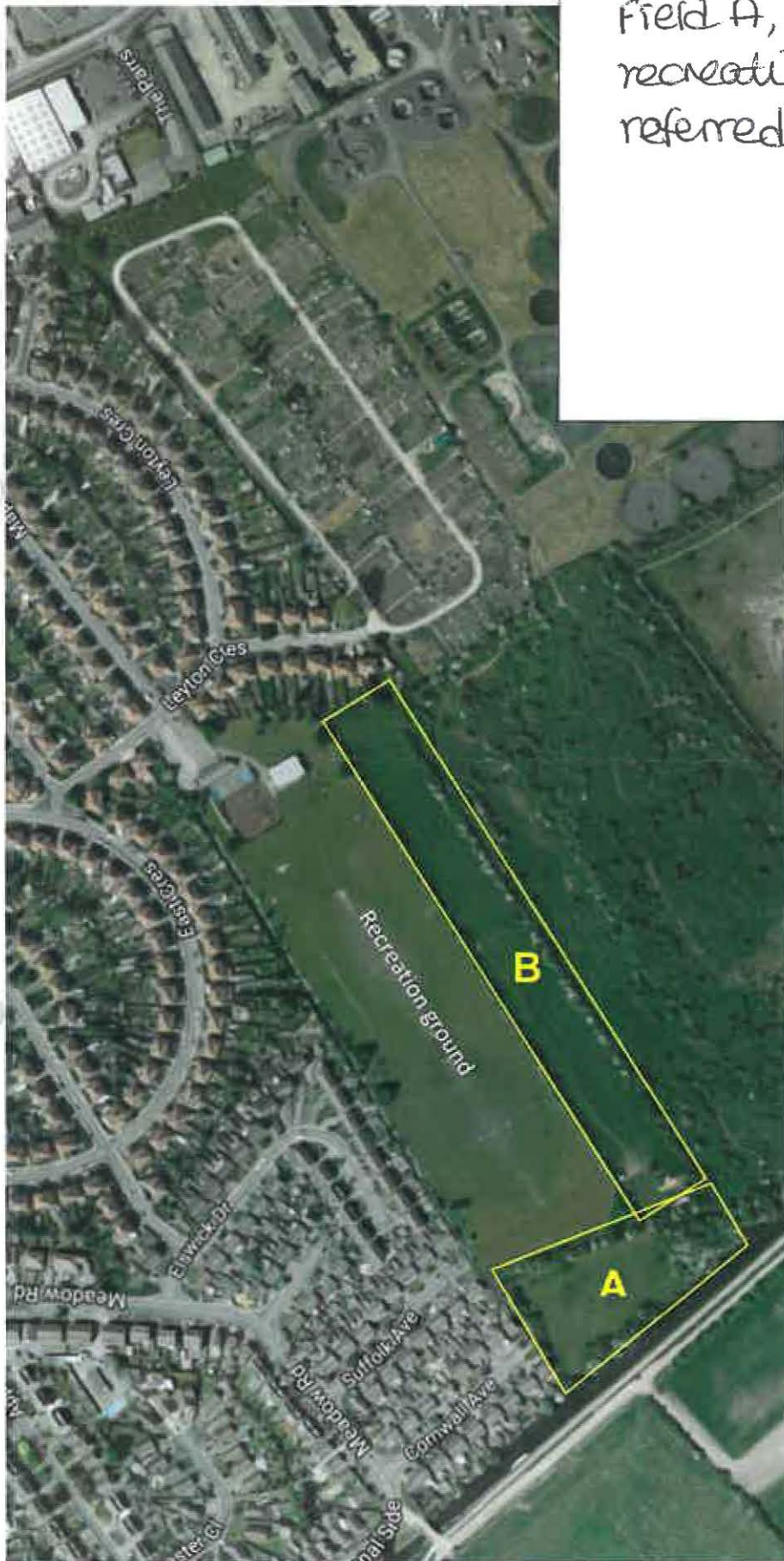
The Local Plan will be justified in designating fields A and B (and the recreation ground) as Local Green Space, as they are of very special value to our local community, and this would protect them for the future.

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



well worn 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.

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

Dear Sir

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

Policy: 3.3 Bramcote (East of Coventry Lane)

Key Development Requirements

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

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

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

Sustainability Appraisal

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

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

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

Yours faithfully

Stephen Austin

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Broxtowe Borough Council
Foster Avenue
Beeston
NG9 1AB

Copies to: Bramcote Neighbourhood Forum
Anna Soubry MP
Mr Henry, Executive Head, White Hills Park Federation

Broxtowe Borough Council
Planning & Community Development

20 OCT 2017

Consultation: Broxtowe Borough Council Local Plan

Dear Sir/Madam,

In submitting my thoughts on the Broxtowe Local Plan, I will confine my remarks to the Bramcote ward.

AECOM's housing needs assessment for Bramcote ward in the period 2011-2028 is in the region of 130-236 net additional buildings, figures which can easily be met without encroaching on the Green Belt.

There is, however, a proposal to build 350 houses on Green Belt land on the school playing fields near Coventry Lane. This would have a significantly detrimental impact on the local environment.

A major arterial road, one of the busiest in Nottingham (the A52) bisects Bramcote and is fed by other busy roads such as Ilkeston Road and Coventry Lane. 350 houses would bring up to 700 more motor vehicles onto our roads, adding to the already high levels of exhaust emissions within the area.

The main justification for the proposal to build on the Coventry Lane site is that Mr Henry, executive head of the White Hills Park Federation, needs to asset strip this land in order to finance a new school and sixth form college.

It has been said this new build would provide benefits for local children and the wider local community.

As for the local community, Bramcote is an affluent area without conspicuous need of assistance. A compensatory material benefit for the loss of a priceless asset - the integrity of the Bramcote Green Belt - would represent a net loss of inestimable proportions.

As for our children, it must be remembered that in recent UK history a correlation between levels of capital spending on education and educational outcomes

has never been established (source: 'Analysis' Radio 4). The characters of achieving cohorts and those of under achieving cohorts are stubbornly persistent. The competitive model for educational institutions devolves increasingly into a battle between Heads for the 'best brains', for achievers who will boost the ratings of a school in the iniquitous league tables. The predilection for shiny new buildings is a consequence of this. Many of Bramcote's children attend prestigious institutions such as the High School, Trent College, Bluecoat and George Spencer. We could forgive Mr Heery for coveting these children, but we must not pretend that children are the beneficiaries of the placements and transfers which ensue from the brand wars of rival school empires. The evidence is irrefutable: the inequalities in society and in the opportunities of our children are increasingly entrenched. We take solace in the delusory charade of shuffling the pack.

Such fallacies are engrained in our attitudes to buildings. Like a pill popping hypochondriac enthralled to the latest medication, we have a dangerous addiction to the idea that if an institution isn't perfect, then a shiny new building is the answer.

There is a childish notion being put about that the old Bramcote School and Bramcote Leisure Centre, each being over 50 years old, have reached the end of their 'natural lives'. What nonsense. Buildings last as long as people care about them, even in extreme circumstances.

Take the humble post war prefab for example. These were designed to last only 10 years, and yet TV presenters Dan Cruikshank and Greg Wallace have each appeared in programmes which featured people in Greater London who still lived in original post war prefabs. Far from being reluctant tenants, these people loved their homely little dwellings. Most touching of all was a disabled lady interviewed by Greg Wallace who had lived in the same prefab almost her entire life. Its interior would have graced the pages of an ideal homes magazine, and she spoke movingly of her love for its generous and airy proportions and the light which flooded through its well appointed windows. Sadly, she was soon to be evicted as her lifetime home was to be bulldozed to make way for property development.

using the 'natural life' metaphor i.e. a prefab can last for more than 60 years than the solid bricks and mortar constructions which are the Bramcote School and the Bramcote Leisure Centre can barely have reached adolescence.

Whatever faults these last 2 buildings have ^{are} more likely a consequence of strategic neglect than ~~are~~ symptoms of terminal decline.

The current leisure centre is popular and profitable and its location next to the A52 minimizes its environmental impact on the park. It is screened from the park by a beautiful wood.

The old school is still viable, and with TLC and prudent investment it could furnish the needs of ^{present and} future generations of school children, especially those on the Stapleford side who now have to walk twice as far to reach their current school location.

Let's not be duped by the shiny new school, shiny new leisure centre brigade. The cost is too high as the people of Bramcote made clear when they voted overwhelmingly in favour of maintaining the established boundaries of the Green Belt at a special meeting in the Memorial Hall in 2016. Furthermore, the current Bramcote ward conservative councillors were elected on a pledge to save the Green Belt.

It is often said that open spaces are the lungs of a city. I would go further and say that they are also the soul of a city, nurturing that inner space which allows our imaginations to flourish.

Contrast this with the claustrophobia of many modern lives, both spatial and temporal. Long working hours, crowded commutes, the persistent clamours of communication devices. These strictures on personal freedom increasingly invade the developmental years. Too often childhood is starved of spontaneity and warmth. Pre school infants are routinely institutionalized in nurseries, denying them that most humane source of primary socialisation: the ubiquitous parent. They are later exposed to a bulimic education system which

force feeds facts far too numerous for wisdom to assimilate, to be periodically disgorged in frenetic bouts of examination. We are obsessed with labelling and grading our children, of forever demanding achievement; stifling the opportunity for natural development and personal growth. I would rather they left school with 100 pieces of knowledge which they cherish than a 1000 which ^{put} encumber their brains. Education should be about planting seeds, not building monuments: a view which latest Ofsted Reports are beginning to recognise. Whilst we strain for a sense of proportion, it is no wonder that so many adult lives end up sterile and sad.

Open spaces make us happy. Any psychologist will tell you. They remind us that life is about being, much more than it is about being in pursuit of something. Whilst urbanization offers comfort and convenience, left unchecked it becomes a ~~pr~~ prison; its walls the urban sprawl, its gaoler the pursuit of profit. It's time to wake up and open our eyes. Let's not let the Bramcote Green Belts become the Bramcote Greed Belts.

Yours sincerely,



Broxtowe Part 2 Local Plan



Broxtowe
Borough
COUNCIL

Agent

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

Your Details

Title	Mr	<input checked="" type="checkbox"/> Mrs	<input type="checkbox"/> Miss	<input type="checkbox"/> Mx	Other:
Name	ROGER HUXTABLE				
Organisation (if responding on behalf of the organisation)					
Address	<div style="background-color: black; width: 100%; height: 60px;"></div>				
Postcode	<div style="background-color: black; width: 100%; height: 20px;"></div>				
Tel. Number	<div style="background-color: black; width: 100%; height: 20px;"></div>				
E-mail address	<div style="background-color: black; width: 100%; height: 20px;"></div>				

Broxtowe Borough Council
Planning & Community Development

20 OCT 2017

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

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

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

Please tick here ☐

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

For more information including an online response form please visit:

www.broxtowe.gov.uk/part2localplan

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

Please return completed forms to:

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

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

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

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

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

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

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

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

Your comments

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

Please see enclosed letter

Question 4: Modifications sought

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

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

Question 5: Public Examination Attendance

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

Yes, I wish to participate at the public examination

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

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

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

Guidance Note:

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

'Legally Compliant':

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

'Compliant with the Duty to Co-operate':

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

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

'Sound'

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

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

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

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

Broxtowe Part 2 Local Plan



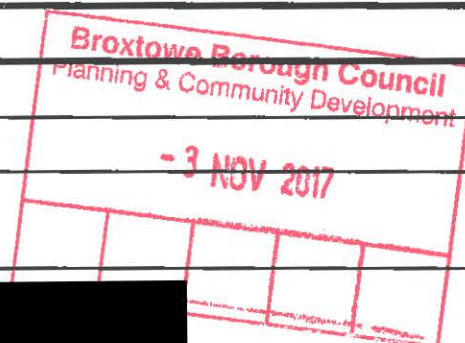
Broxtowe
Borough
COUNCIL

Agent

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

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

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

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

Please tick here

☐

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

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

www.broxtowe.gov.uk/part2localplan

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

Please return completed forms to:

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

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

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

Document	Policy number	Page number	Policy text/ Paragraph number
Part 2 Local Plan	Policy 1: Flood Risk		
	Policy 2: Site Allocations		
	Policy 3: Main Built up Area Site Allocations		
	Policy 4: Awsworth Site Allocation		
	Policy 5: Brinsley Site Allocation		
	Policy 6: Eastwood Site Allocation		
	Policy 7: Kimberley Site Allocations		
	Policy 8: Development in the Green Belt		
	Policy 9: Retention of good quality existing employment sites		
	Policy 10: Town Centre and District Centre Uses		
	Policy 11: The Square, Beeston		
	Policy 12: Edge-of-Centre A1 Retail in Eastwood		
	Policy 13: Proposals for main town centre uses in edge-of-centre and out-of-centre locations		
	Policy 14: Centre of Neighbourhood Importance (Chilwell Road / High Road)		
	Policy 15: Housing size, mix and choice		
	Policy 16: Gypsies and Travellers		
	Policy 17: Place-making, design and amenity		
	Policy 18: Shopfronts, signage and security measures		
	Policy 19: Pollution, Hazardous Substances and Ground Conditions		
	Policy 20: Air Quality		
	Policy 21: Unstable land		
	Policy 22: Minerals		
	Policy 23: Proposals affecting designated and non-designated heritage assets		
	Policy 24: The health impacts of development		
	Policy 25: Culture, Tourism and Sport		
	Policy 26: Travel Plans		
	Policy 27: Local Green Space	138 & 39	3.5313-315
	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 NOT 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.

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

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 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 Broxtownes C.A.T. meetings. Designation as Local Green Space is justified by its value locally.

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

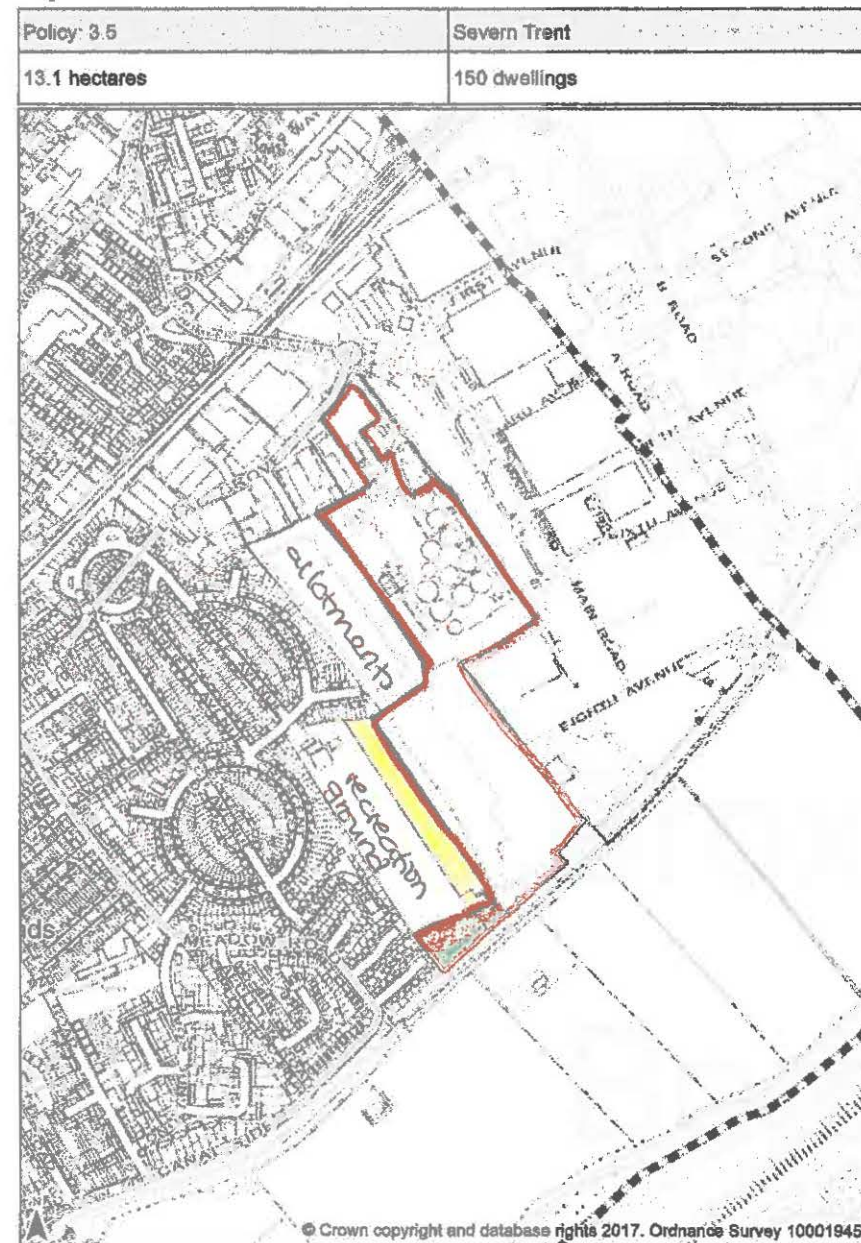
Key Development Aspirations;

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



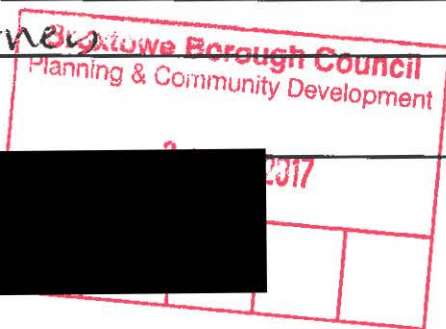
Broxtowe
Borough
COUNCIL

Agent

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

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					



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 3 - Site para 2.13 - 31
	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 paras
	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 (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 habitat.
- * its of historic interest: field + adjacent canal are over 200yrs old / field contains remains of an ancient track.
- * its of recreational value to walkers / dogowners who use the field everyday, shown by the well-worn paths.

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 hedgerow, 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.**

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'.

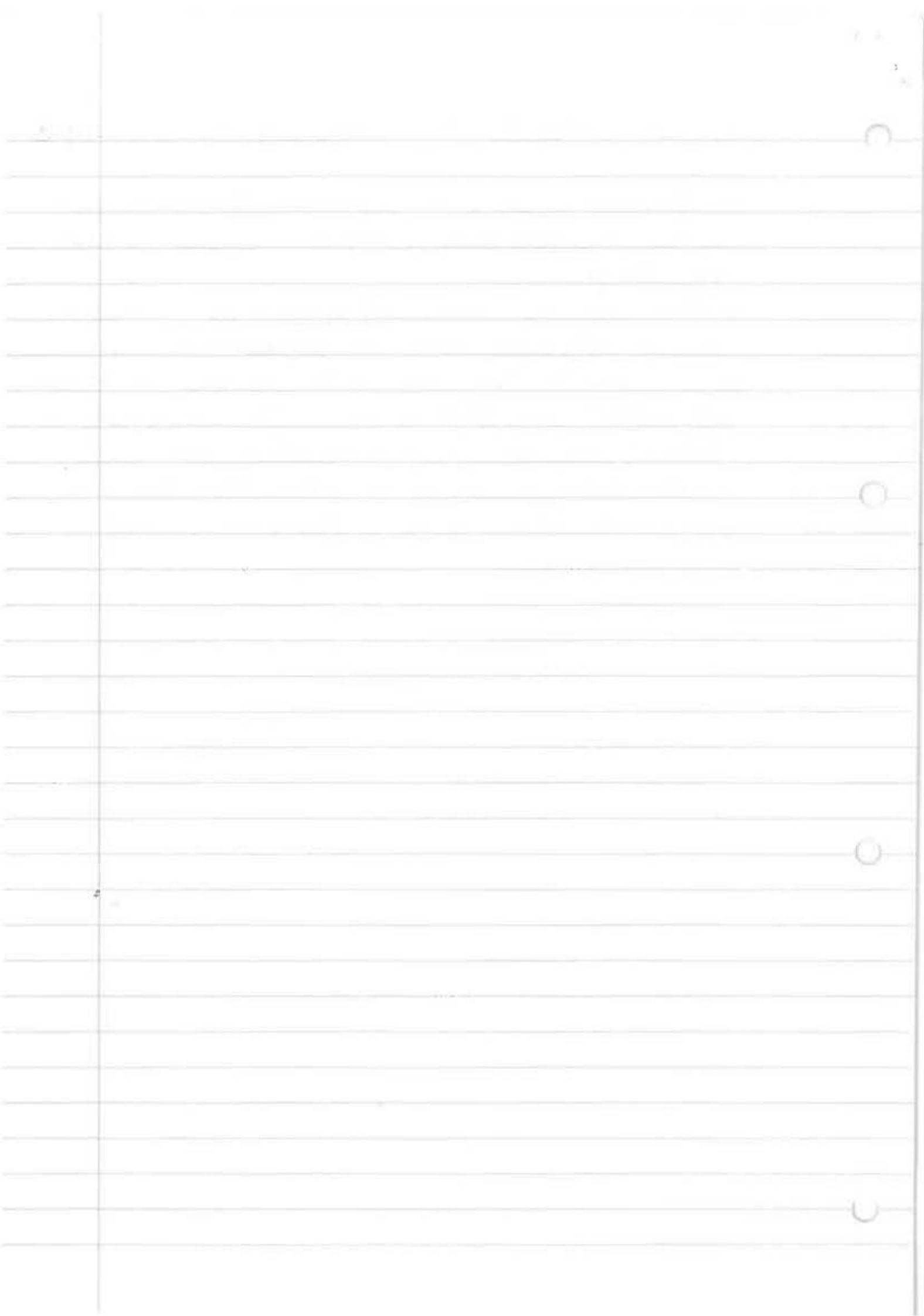
To meet the 'Test of Soundness', the independent Planning Inspector is required to consider whether or not our Local Plan is '**justified**', '**effective**', has been '**positively prepared**', and is '**consistent with national policy**'. You may wish to consider the following before making a representation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

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 Ryland and the new ^{Severn} ~~East~~ 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
- 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.

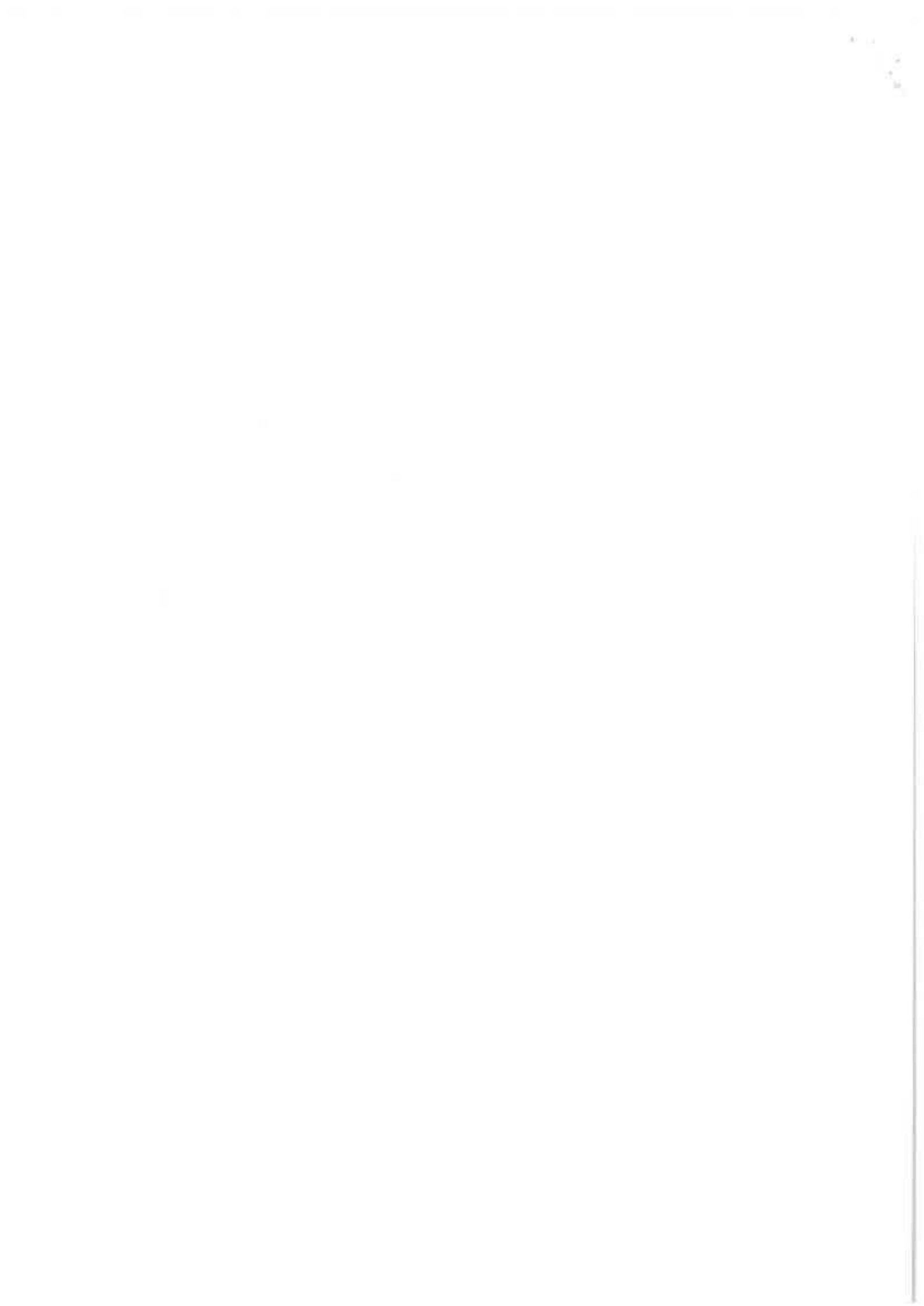
What the Sustainability Appraisal says

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

Policy 3.5	Severn Trent
13.1 hectares	150 dwellings

© Crown copyright and database rights 2017. Ordnance Survey 100019453



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	
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	
	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.

I INCLUDE THE CORNHILL AVENUE FIELD (COLOURED GREEN ON THE PLAN) IN A HOUSING SITE IS NOT JUSTIFIED AS IT IS OF MUCH GREATER 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) NATURE TO WILDLIFE D) PART OF A GREEN CORRIDOR STRETCHING FROM THE CANAL TO ALMOST LILAC GROVE. E) EASILY ACCESSIBLE "POCKET OF COUNTRYSIDE" BETWEEN RYLANDS AND THE PROPOSED SEVENTON TREST DEVELOPMENT. F) EDUCATIONAL VALUE FOR LEARNING ABOUT NATURE G) ITS VALUE TO THE COMMUNITY WAS DEMONSTRATED AT BROXTON'S JULY CAT MEETING WHERE LOCAL PEOPLE VOTED UNANIMOUSLY (48 VOTES) TO KEEP THIS FIELD AND NOT BUILD HERE (VOTE WAS 100% BY COUNCILLOR 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.

THE FOLLOWING MODIFICATIONS SHOULD BE MADE TO THE LOCAL PLAN:

A] CORNWALL AVENUE FIELD (WITH ITS SURROUNDING WOODGROUNDS SHOULD BE REMOVED FROM THE SEVEN TRENT HOUSING SITE.

B] CORNWALL AVENUE FIELD (WITH ITS SURROUNDING WOODGROUNDS 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 WOODGROUNDS. 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 SEVEN TRENT 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 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':

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

