

Proposed Additional Policies

4	Environment Agency
6882	Broxtowe Labour Group
6978, 2767 and 307	KENTAG (Kimberley, Eastwood, Nuthall Tram Action Group) (Supported by Borough Councillor, Richard Robinson and Gloria De Piero MP)

Details

Agent	
Please provide your client's name	The Environment Agency
Your Details	
Title	
Name	
Organisation (If responding on behalf of an organisation)	The Environment Agency
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.)
					Omission

Question 1: What does your comment relate to? Please specify exactly
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Question 2

Question 2: What is the issue with the Local Plan?	
Do you consider this paragraph or policy of the Local Plan to be:	
2.1 Legally compliant	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.	Surface water runoff and sustainable drainage systems. From a strategic overview perspective the Environment Agency welcomed the inclusion of paragraph 10 of Policy 1: Climate Change of the Aligned Core Strategy which stipulated the requirement for all new development to incorporate measures to reduce surface water runoff and incorporate sustainable drainage systems whenever feasible. We are disappointed that this requirement has not been included and expanded upon in the Publication Version of the Part 2 Local Plan and consider this a missed opportunity. Since the Lead Local Flood Authority are the statutory consultee for reviewing surface water drainage schemes for development proposals at the planning application stage we recommend
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	<p>you seek their views on this issue. From the Environment Agency's perspective we suggest you explore the possibility of incorporating at the least the following wording into either an existing or new policy in your Part 2 Local Plan:</p> <p>"All developments will be encouraged to include Sustainable Drainage Systems (SuDs) where appropriate to manage surface water effectively on site, to reduce surface water runoff and to ensure flooding is not increased elsewhere. Where possible SuDS should also be designed to enhance biodiversity value. A two stage SuDs treatment should be used in order to improve water quality. An appropriate maintenance and management plan, agreed with the Council, will be required for all Sustainable Drainage systems and where appropriate, S106 Agreements will be sought.</p> <p>Other than in exceptional circumstances (for example where it is not technically feasible or where the benefits of the scheme clearly outweigh other factors):</p> <p>a) development on greenfield sites should maintain greenfield surface water run off rates;</p> <p>b) brownfield sites should achieve as close to greenfield runoff rates as possible and must achieve betterment to existing runoff rates. A minimum of 30% reduction in run off rates will be expected;</p> <p>c) applicants should supply sufficient technical evidence to demonstrate that the maximum possible reduction in runoff rates has been achieved."</p>
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Question 4

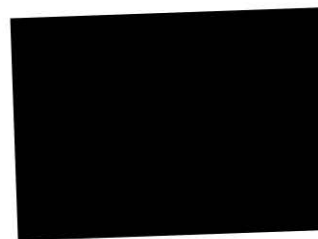
Question 4: Modifications sought	
Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this modification will make the Local Plan legally compliant or sound.	We do consider the Plan legally compliant and sound; however we wish to draw your Authority's attention to the comments the we make in answer to Question 3.

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	



6882



3rd November 2017

Broxtowe Labour Group response to the Local Plan Part 2

Dear Steffan

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Yours sincerely,

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

[REDACTED]

From: SueCooper [REDACTED]
Sent: 19 October 2017 17:33
To: Policy
Subject: Public Consultation--Local Plan Part 2

Dear Sir/Madam

Please accept this submission. I am Chairman of the pressure group KENTAG (Kimberley, Eastwood, Nuthall Tram Action Group) which was formed in 2009. Since that time the group has attracted hundreds of members in the area who recognise the need for greener, sustainable and quicker transport links at a time when the area will see future housing developments which will increase pressure on the present infrastructure.

In the past 30 years the area has witnessed a massive reduction in local employment. The coal mines, textiles and brewing which were the major employers have gone. The majority of residents now work in either Derby or Nottingham.

The group's aim over the years has been to attempt to get the tram route protected. It is essential that any future housing development saves space for the tram. This was emphasised several years ago by a government inspector who rejected an appeal against a development adjacent Nuthall island and insisted that the developers make provision in their plans to leave space for the tram.

If the population increases as a result of the Core Strategy there must be an emphasis on greater connectivity.

A tram route to Kimberley and beyond was first suggested as far back as 1991 by Borough Councillors. Since then several routes have been constructed. Meanwhile residents north of Nuthall island suffer horrendous traffic congestion if commuting to and from Nottingham at peak times. Traffic congestion will only get worse, not to mention air quality and noise.

Yours sincerely
Andrew Cooper
[REDACTED]

[REDACTED]

From: DEPIERO, Gloria [REDACTED]
Sent: 23 October 2017 13:41
To: Policy
Subject: Tram Extension
Attachments: image001.png; image003.png

policy@broxtowe.gov.uk

Broxtowe Borough Council
Foster Avenue
NG9 1AB

Our Ref: LA/DE P01002/01170532

23 October 2017

Re: Tram Extension

As Labour Member of Parliament for Ashfield (which covers part of the Broxtowe Borough) - and in particular Eastwood, I would like to add my support for protection of the proposed tram route extension from Phoenix Park to Kimberley & Eastwood as an integral part of the Broxtowe Part 2 local plan.

I would be very grateful if you could include my submission below as part of the formal feedback to the current consultation exercise.

As MP for Eastwood I am very much aware of the need to promote public transport investment along the A610 corridor from Eastwood into Nottingham.

As a previous coal mining area, Eastwood desperately needs investment in public transport infrastructure to help boost regeneration, investment and job creation. The onset of Hs2 hub station in Toton - in the southern area of neighbouring Broxtowe - will I am sure provide much additional opportunities for future transport funding. The extension of the tram from Phoenix Park out to Kimberley and Eastwood makes perfect sense in light of this.

It is right therefore that Eastwood in the north of Broxtowe, so often an area which appears to miss out on funding, going instead to more affluent parts of the borough, now starts to receive its fair share of investment.

I am passionate about securing a modern, fast and efficient means of transport for my constituents in Eastwood to be able to travel not only to Nottingham, but also the new opportunities that will be provided by Hs2 investment.

Public transport investment will also be of paramount importance alongside the new housing developments that will also take place in and around Eastwood.

Yours sincerely

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From: Robinson, Richard
Sent: 23 October 2017 18:49
To: Policy
Subject: Broxtowe Part II local plan

Importance: High

Broxtowe Part 2 Local Plan
policy@broxtowe.gov.uk

Dear Sir

As ward borough councillor for Kimberley I would like to add my support for protection of the proposed tram route extension from Phoenix Park to Kimberley & Eastwood as an integral part of the Broxtowe Part 2 local plan. I write not on only behalf of myself but the whole Labour Group of cllrs at Broxtowe, and many residents in Kimberley and the surrounding areas who support such development. We do not wish to see housing encroach or hinder on the proposed route.

The background to the campaign can be found at:

<http://richardsrobinson.org.uk/2015/02/tram-extension-line-4-phase-iii-to-kimberley-eastwood-into-amber-valley/>

- a) We believe that the provision of new housing in and around Kimberley will require much greater public transport investment and connectivity.
- b) We believe that the tram extension makes perfect sense for increased investment in the north of the borough of Broxtowe (so often starved of resources - an old coal field regeneration area), alongside resources being heavily ploughed into the south of the borough with the advent of Hs2 in Toton.
- c) we do not believe that with regards to public transport investment, there is the option to do nothing. Housing and transport investment go side by side and we need to ensure that as a council - we are leading the way in encouraging public transport investment, not forever playing catch up, and that Broxtowe should be actively working collaboratively with other local authorities to secure the tram extension to Kimberley & Eastwood during the next 12 years.