

BROXTOWE BOROUGH COUNCIL

Part 2 Local Plan: Site Allocations and Development Management Policies

Statement of Compliance with the Duty to Cooperate

July 2018

Quick guide to the Statement of Compliance with the Duty to Cooperate

This document provides evidence that the Broxtowe Part 2 Local Plan: Site Allocations and Development Management Policies has been prepared in accordance with the Duty to Cooperate.

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1.0 Introduction

- 1.1** This report sets out how Broxtowe Borough Council has complied with the duty to cooperate introduced under the Localism Act 2011 in the preparation of the Broxtowe Borough Council Part 2 Local Plan: Site Allocations and Development Management Policies.
- 1.2** Part 1 of Broxtowe's Local Plan, the Broxtowe Borough Aligned Core Strategy, was adopted in 2014, and provides the planning framework for the strategic development of Greater Nottingham, including how the objectively assessed need for housing and employment will be met across the Housing Market Area (which comprises the full administrative areas of Broxtowe, Erewash, Gedling and Rushcliffe Borough Councils and Nottingham City Council). How the Duty to Cooperate was met for matters included in the Core Strategy was set out in a separate Compliance Statement (2013), and was tested at the Core Strategy Examination.
- 1.3** The Core Strategy dealt with many of the strategic matters with cross-boundary implications. Nonetheless, the Duty to Cooperate is an on-going continuous process of engagement that continues through to implementation, and this statement has been prepared to demonstrate how Broxtowe Borough Council has met the Duty in the preparation of its Part 2 Local Plan.
- 1.4** There is a long history of joint working and cooperation between the Councils making up Greater Nottingham, and other key stakeholders in the area. The preparation of Core Strategies in Greater Nottingham was part of this process, with on-going and constructive engagement between constituent and neighbouring authorities and relevant organisations since the preparation process began in 2008.
- 1.5** The Infrastructure Delivery Plan which underpinned the Greater Nottingham Core Strategies was prepared with the full positive engagement of the Environment Agency, English Heritage, Natural England, Homes and Communities Agency, Clinical Commissioning Groups (role formerly provided by Primary Care Trusts), Highways England and the three Highway Authorities. The relevant elements of this have been rolled forward and updated, and an Infrastructure Delivery Plan has been prepared to support the Part 2 Local Plan.
- 1.5** Broxtowe Borough Council has sought to positively engage with all the relevant duty to cooperate bodies throughout the preparation of the Part 2 Local Plan, and is confident that it has fully complied with the duty.

2.0 Duty to Cooperate' as set out in the Localism Act 2011

- 2.1** The duty to cooperate is set out in Section 110 of the Localism Act 2011 which requires an amendment to Part 2 of the Planning and Compulsory Purchase Act 2004.
- 2.2** The Act makes clear that the 'duty' applies to all those with planning responsibilities, including local planning authorities and other planning bodies, undertaking the

preparation of Local and other prescribed plans in so far as these plans relate to a 'strategic matter'. The duty:

- Relates to sustainable development or use of land that would have a significant impact on at least two local planning areas or on a planning matter that falls within the remit of a County Council;
- Requires that Councils set out planning policies to address such issues;
- Requires that Councils and public bodies 'engage constructively, actively and on an ongoing basis' to develop strategic policies; and
- Requires Councils to consider joint approaches to plan making.

2.3 Paragraphs 178 to 181 of the NPPF give guidance on planning 'strategically across local boundaries' and highlight the importance of joint working to meet development requirements that cannot be wholly met within a single local planning area, through either joint planning policies or informal strategies such as infrastructure and investment plans.

2.4 The NPPF states that: "The Government expects joint working on areas of common interest to be diligently undertaken for the mutual benefit of neighbouring authorities" (NPPF paragraph 178) and further that: "Local planning authorities should work collaboratively with other bodies to ensure that strategic priorities across local boundaries are properly coordinated and clearly reflected in individual Local Plans." (NPPF paragraph 179).

2.5 Part 2 of the Town & Country Planning (Local Planning) (England) Regulations 2012 which came into effect on the 6th April 2012, clarifies that the bodies prescribed for the purposes of section 33A (1) (c) of the Localism Act 2011 (in relation to the duty to cooperate) comprise the following:

- Local Planning Authorities, either neighbouring or making up the Housing Market Area
- Environment Agency
- Historic England
- Natural England
- Mayor of London
- Civil Aviation Authority
- Homes England (formerly Homes and Communities Agency)
- NHS Nottingham West (Primary Care Trust) now replaced by Clinical Commissioning Group
- Office of the Rail Regulator
- Highways England
- Transport for London
- Integrated Transport Authorities
- Highway Authorities

- Marine Management Organisation
- Local Enterprise Partnerships
- Local Nature Partnerships

2.6 There are two main separate aspects of the duty:

- i. The legal requirement to cooperate. PINs will need to see sufficient evidence to demonstrate that the duty to cooperate has been undertaken in accordance with the 2011 act appropriate to the plan being examined.
- ii. If PINs consider that the legal requirement to cooperate has been met through joint working but there is disagreement about the policy outcome (for example the proposed level of housing provision), then this will need to be resolved through the examination process based on the evidence.²

2.7 This document sets out how the legal duty has been met by Broxtowe Borough Council on an on-going basis, in the preparation of the Broxtowe Part 2 Local Plan and how any strategic issues have been resolved through the duty. Some of these duty to cooperate groups in relation to London and Marine Management are not relevant to Broxtowe.

3.0 The Plan Area and Relationship to the Greater Nottingham Housing Market Area

3.1 The Part 2 Local Plan covers the administrative area of Broxtowe, which is a Borough Council. However, much of the built up area of Greater Nottingham is located in the wider Housing Market Area (HMA), which consists of the council areas of Erewash Borough, Gedling Borough, Nottingham City and Rushcliffe Borough, together with the relevant parts of Nottinghamshire and Derbyshire County Councils. In addition, the Hucknall part of Ashfield, although located in the Nottingham Outer HMA, has a strong functional relationship with, and forms part of Greater Nottingham.

4.0 Cooperation with Greater Nottingham Councils and Prescribed Bodies

The preparation of the Greater Nottingham Core Strategies was overseen by the Greater Nottingham Joint Planning Advisory Board (JPAB), which is made up of the Portfolio Holding Councillors for planning and transport of the constituent authorities. JPAB meets around four times a year, and although the Core Strategies are now adopted, it has turned its focus towards implementation of the Core Strategies, which includes the preparation of Part 2 Local Plans where relevant. Several of the prescribed bodies are observer members of JPAB, including the Environment Agency, Natural England, Highways England, Homes England and D2N2 Local Enterprise Partnership.

² See para 182 of NPPF (2012)

- 4.1** JPAB is serviced by at least monthly meetings of the planning officers of the constituent Councils. Recent cooperation has focused on matters such as the implementation of Sustainable Urban Extensions, progressing the planning of the HS2 Hub Station at Toton which is a mixed use allocation in this Local Plan, and working together on creating aligned and consistent Self Build Register for Greater Nottingham. Pilot Brownfield Registers for Broxtowe, Gedling, Nottingham and Rushcliffe have also been successfully jointly prepared.
- 4.2** JPAB receives regular updates on Local Plan progress across Greater Nottingham, and the officer group works together to ensure the continuing coherent strategic planning of the area, commissioning new evidence as necessary (such as the Employment Land Forecasting Study 2015 and SFRA Addendum 2017). JPAB is gearing up to begin a review of the Core Strategies, using the 2016-based household projections (due for release later in 2018) as the basis for objectively assessed need. Anticipated timescales for this are shown on the current Local Development Scheme with adoption expected in 2021.
- 4.3** This on-going process has ensured that no unresolved duty to cooperate issues have arisen between the constituent Councils in the preparation of their Part 2 Local Plans.
- 4.4** This section sets the nature of cooperation with each Prescribed Body, gives a summary of cooperation, process of consultation and sets out what, if any, outstanding key strategic issues need to be considered at the Examination. Although in every case, it is considered that the legal requirement under the duty to cooperate has been met, it has not always been possible to resolve fully issues where parties disagree. It is the Borough Council's view that the legal and soundness aspects of the duty to cooperate have been resolved, however, where issues are not fully resolved with a prescribed body, these issues are set out.
- 4.5** Although the duty to cooperate goes beyond consultation, several of the prescribed bodies have made representations on the Publication version of the Part 2 Local Plan. In a few cases these have identified some issues which can be met through minor changes to the Local Plan, and they also flag up a small number of which remain unresolved. However, none of these fall into the category of having "a significant impact on at least two local planning areas" and so are not considered to be of a strategic nature.
- 4.6** Appendix 1 details the steps taken to resolve issues raised by the prescribed bodies, both up to publication and then as a result of comments received during the publication consultation on the plan.

Appendix 1
Nottingham City Council

When they were consulted	What they were consulted on	What they Said	What has happened subsequently / What we did in response
November 2013	Site Allocations Issues and Options Consultation	107 - Land at Woodhouse Way Nuthall <ul style="list-style-type: none"> • Would not support the development of this site. 	Site not allocated in line with their request
		220 - Land east of Low Wood Road Nuthall <ul style="list-style-type: none"> • Would not support the development of this site. 	Site not allocated in line with their request
		Town Centres Main town centre uses below 1,000sqm should not need to provide an impact assessment.	500 is the appropriate figure which follows evidence in the Carter Jonas retail evidence to support the Local Plan from 2015
		Transport <ul style="list-style-type: none"> • Requirement of transport measures should be assessed on a site by site basis (i.e. no threshold) • If thresholds used then percentage margin should be included. Integrated transport hubs and linked sustainable systems are key and any safeguarded routes should be retained so long as there is sufficient capacity. 	Agree in principle and most of these issues will be included in the development management process. Routes for transport infrastructure such as the tram extension to the HS2 station are safeguarded in policies, but there remains uncertainty as to the exact route and alignment.
January / February 2015	Meetings with Nottingham City and Ashfield District Councils to discuss and agree a joint approach to cross-boundary Green Belt between settlements.	Agreed Joint approach	
February 2015	Preferred Approach to site allocations: Green Belt	NCC were a partner in this consultation	

	Review Consultation		
February 2015	Development Management Policies Issues and Options Consultation	No representations made.	
November 2015	Strategic Location for Growth at Toton Consultation	<ul style="list-style-type: none"> Submitted two possible masterplan's (not intended to be comprehensive – rather to stimulate debate). Masterplan should not prejudice development around the station. When developed this area will have a very different character to current and should be planned as a new place. Residential development should reflect the place one developed rather than as it is now. Low density suburban development may not be appropriate. Masterplanning should include former nursery to the west of Toton Lane and Garden Centre to the East of Toton Lane – options to acquire these sites may emerge as structures around the station are consolidated. Options to move existing uses within the location to achieve better disposition of land should be considered – e.g. George Spencer to relocate to the East of Toton Lane. Net Park and Ride site could also be relocated outside the location for growth or part of HS2 operational land. Local centre should be visible and accessible from 	<p>It will be possible to include the broad amounts of economic development put forward by Nottingham City Council , although other ways are put forward of achieving this. This will also allow for the delivery of housing in such a way that this is deliverable in the short to medium term, will function as a better connected development to the existing settlement of Toton in line with the principles established by the Design Review process (include link) prior more comprehensive re-development of the location once HS2 is operational</p> <p>Planning with a view to the density of the residential development as it will sit in a mixed use location is considered to be good planning, and this may include higher average density when compared to Toton. The points relating to inclusion of the nursery in the location, the local centre and the principle of increasing the economic potential are also agreed in principle.</p> <p>For Bardills, although the suggestion of not excluding this area from our thinking is sensible and good planning, it is considered too early at</p>

		<p>Toton Lane to ensure vitality and viability.</p> <ul style="list-style-type: none"> Planned housing at 30 dwgs/ha average (reflective of current development in the area) should be increased because of nature of future development in area. Lower end of the density range should be around 40 dwgs/ha which would free up more land for economic development. Example of good quality high density housing = Green Street Development in the Meadows area of the City – both sustainable and attractive. Developing all or some of the housing on the East of Toton Lane would allow more economic development to the West with a better relationship with the Toton hub. It is considered that the amount of economic development to the West of Toton Lane should be increased more in-line with the Oxalis development approach. 	<p>this stage to take steps to include this within an area proposed to be removed from the Green Belt. The reason for this is that the long term Green Belt boundary is considered to be best located along the existing tram line and park and ride being a defensible long term boundary. In addition the area to the north of the strategic location including that in the vicinity of the garden centre is identified as a Green Infrastructure corridor.</p> <p>The re-location of the school is considered to be a disproportionate upheaval particularly as this is at the northern edge of the strategic location and can be successfully incorporated into planning for the wider area without compromising other ambitions. The tram park and ride may be relocated in the long term, but ambitions for the wider area can be incorporated with the Tram park and ride in its current location.</p>
August 2016	Site Allocations Potential Additional Sites Consultation	<p>Bramcote: Support Allocation and question availability of supporting evidence.</p> <p>Represents significant contribution to housing requirements of Greater Nottingham as well as those in Broxtowe (set out in the Aligned Core Strategy).</p> <p>Although currently Green Belt it forms a natural sustainable extension to the existing urban area of</p>	<p>Broxtowe welcome the support from the City Council with regards to the potential Bramcote site allocation. This allocation was carried forward into the publication version of the Part 2 Local Plan and sufficient supporting evidence was available with the consultation, in particular the evidence from the previous Green Belt Review consultation</p>

		<p>Greater Nottingham and provides opportunities to enhance Green Infrastructure and wildlife corridors throughout the site and protects Bramcote Park, Stapleford Hill and the Ridgeline.</p> <p>It also has direct access off Coventry Lane.</p>	
		<p>Chetwynd: Support Allocation and question availability of supporting evidence.</p> <p>Represents significant contribution to housing requirements of Greater Nottingham as well as those in Broxtowe (set out in the Aligned Core Strategy).</p> <p>Located with the existing built up area of Greater Nottingham and is brownfield.</p> <p>Proposals further Core Strategies approach in terms of urban concentration with regeneration.</p>	<p>Broxtowe welcome the support from the City Council with regards to the potential Chetwynd site allocation. This allocation was carried forward into the publication version of the Part 2 Local Plan with no objections from the City Council to doing so.</p>
		<p>Nuthall: Oppose Allocation - In the joint assessment carried out by Nottingham City and Broxtowe the site performs very well in Green Belt terms. Development would involve encroaching across the existing defensible boundary that is formed by the disused railway line and Blenheim Industrial Estate and there is no obvious new defensible boundary.</p> <p>The site lies immediately adjacent to a SSSI, Local Nature Reserve and Ancient Semi-Natural. It is ancient woodland and has a woodland ground flora that includes notable</p>	<p>Broxtowe note the strong objection from the City Council and as a result of the consultation response the site was not carried forward into the Part 2 Local Plan.</p>

		<p>species. City Council has strong concerns about residential development within such close proximity to a site and habitat of such high value.</p> <p>Ancient woodland should always have a buffer that is retained as open space or agriculture and not developed so as not to isolate the fauna that uses the woodland and to protect the woodland from excessive human pressure. For example to protect form fly-tipping, the spread of non-native species and pressure to trim over-hanging trees etc.</p> <p>Although a buffer is proposed to Sellers Wood the need to provide more direct pedestrian and cycle links to the urban area to the east and increased human activity will have a potential negative impact, including on Colliers Wood.</p> <p>Grande 3 Agricultural Land quality – Local Planning Authorities should seek to use areas of poor quality land in preference to that of high quality. No assessment has been provided to show that there is no alternative (as required by NPPF).</p> <p>Vehicular access would need to be taken through Blenheim Industrial Estate as the city would not permit direct access from Sellers Wood Drive West which it owns, in order to avoid harm to the SSSI. This would provide poor connection with the wider urban area, promoting a</p>	
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		<p>greater propensity for car borne journeys due to poor links to public transport or existing footpath/cycle links specifically into the urban area within the City to the east.</p> <p>The site is remote from existing facilities.</p> <p>Possible highway capacity issue with surrounding highway network as well as conflict between Heavy Goods Vehicles using the Industrial Estate.</p> <p>New public green space to the west of the site would not be an ideal location for the existing residential areas within the City.</p> <p>Noted that distances are 'as the crow fly's' and hides how poor the connections are to surrounding facilities.</p> <p>Site performs poorly in sustainability terms.</p> <p>Notwithstanding the strong objection, should the site be taken forward for development and S106 contributions would need to consider the impact of the development on the City (e.g. Education, transport to be paid to City Council and not County Council).</p>	
February 2017	Brinsley Alternative Site Consultation		
September 2017	Publication	No objections but request that tram route is safeguarded in the site allocation at Kimberley (Policy 7.1)	No specific safeguarding is necessary as the potential tram route will be via an embankment at the south eastern boundary of the site which is unsuitable for development in any event and is

			protected via requirements to maintain green infrastructure corridors.
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Erewash Borough Council Comments

When they were consulted	What they were consulted on	What they Said	What has happened subsequently / What we did in response
November 2013	Site Allocations Issues and Options Consultation	<p>Transport</p> <p>Support the site allocations document but note that any development near the boundary between Erewash and Broxtowe should take into account the cumulative impact of traffic with that of other sites planned on both sides of the boundary.</p>	<p>Noted and extensive work in relation to HS2 in particular will fully take into account cross boundary issues.</p>
February 2015	Preferred Approach to site allocations: Green Belt Review Consultation	<p>Growth of Awsworth should capitalise on close proximity to Ilkeston railway station - fostering sustainable travel e.g. additional (or re-routed) local bus services, or enhancements to footpaths, roads and cycle-ways.</p> <p>EBC has produced the Ilkeston Gateway Supplementary Planning Document (SPD) - framework transport/access proposals will be considered against in order for its full economic potential to be reached.</p> <p>Importance of collaborative working - EBC wish to provide support to any future efforts to further enhance connectivity between Awsworth and Ilkeston station.</p> <p>Disused Bennerley Viaduct important as part of the accessibility network - aware of efforts to return the Viaduct to an active use and generally support any</p>	<p>Broxtowe has incorporated the request into the Awsworth housing allocation in the Part 2 Local Plan Policy 4.1: Land west of Awsworth (inside the bypass) which includes the following key development requirements;</p> <ul style="list-style-type: none"> • <i>“Provide safe pedestrian crossing points across the bypass.</i> • <i>Enhance Green Infrastructure corridors by linking Awsworth with Ilkeston/Cotmanhay via Bennerley Viaduct.</i> • <i>Enhance walking and cycling routes to Ilkeston Railway Station.</i> • <i>Enhance bus routes adjacent to the site”</i> <p>Broxtowe has also incorporated the request with regards to Bennerley Viaduct (as part of the ‘Great Northern Path’ recreation route) into the Part 2 Local Plan Policy 28: Green Infrastructure Assets which states;</p>

		<p>such initiatives in this regard. Its re-establishment could contribute to enhancing the local Green Infrastructure network and allow walkers and cyclists to cross and explore the Erewash Valley in an east-west direction.</p> <p>Viaduct would also contribute to the extension of the Great Northern Greenway, a recreational trail, beyond the current point of termination at Cotmanhay, crossing the Erewash Valley and finally over into Broxtowe heading in the direction of Awsworth.</p>	<p><i>“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:...</i></p> <p><i>e) Recreational Routes”</i></p>
		<p>Zone 7: Notes conclusions which recognise the important role to ensure continued separation of settlements.</p> <p>Development would additionally serve to substantially narrow the current gap between Eastwood and Cotmanhay</p>	<p>Broxtowe Borough Council welcomes Erewash Borough Councils support for their conclusion that development is not appropriate in this location. This area has not been carried forward as an allocation in the Part 2 Local Plan.</p>
		<p>Zone 33: Zone broadly flanks the western fringes of Stapleford.</p> <p>Close proximity between the land under review inside Broxtowe and a number of urban areas (in Erewash) situated west of the River Erewash.</p> <p>Noted than no release of Green Belt land within zone is required.</p>	<p>Broxtowe Borough Council welcomes Erewash Borough Councils support for their conclusion that development is not appropriate in this location. This area has not been carried forward as an allocation in the Part 2 Local Plan.</p>
		<p>Zone 43: Presence of River Erewash and lack of defences expose area to flooding – mitigation required</p>	<p>Broxtowe Borough Council welcomes Erewash Borough Council support for their position with regards to the lack of</p>

		if released for development	flood defences. This area has not been carried forward as an allocation in the Part 2 Local Plan.
		Zone 44: Contains Attenborough Nature Reserve, a prominent area of wetland with great ecological significance. EBC fully agree with BBC's conclusion that any release of Green Belt for residential development would be inappropriate.	Broxtowe Borough Council welcomes Erewash Borough Councils support for their conclusion that development is not appropriate in this location. This area has not been carried forward as an allocation in the Part 2 Local Plan.
		Zone 48 & 49: Located to the south-west of the settlement of Trowell, directly abutting Erewash - assessment acknowledges number of limiting factors which raise uncertainties as to the suitability of these broad locations to deliver future housing development.	Broxtowe Borough Council welcomes Erewash Borough Council support for their position with regards to the constraints associated with development at Trowell. Trowell is not a 'Key Settlement' in the Aligned Core Strategy and no amendments to the Green Belt boundary are proposed here. This area has not been carried forward as an allocation in the Part 2 Local Plan
February 2015	Development Management Policies Issues and Options Consultation	No representations made.	
November 2015	Strategic Location for Growth at Toton Consultation	<p>Erewash are supportive of Broxtowe in meeting development requirements of the ACS.</p> <p>Support incorporation of recommendations into on-going work as set out in EBC's Toton HS2 Station Area Plan.</p> <p>EBC strongly advocate establishment of north-south</p>	Comments have been incorporated in the submission version of the Plan

		<p>link road connecting A6005, B5010 and HS2 station.</p> <p>Future development should not prejudice the ability to construct north-south route.</p> <p>EBC urge caution regarding scale of retail floor space to be promoted – suggest the use of the word ‘neighbourhood’ rather than ‘local’.</p> <p>Encouraged that Broxtowe are committed to working with Erewash to ensure that development design takes into account the Sandiacre Lock Conservation Area.</p>	
August 2016	Site Allocations Potential Additional Sites Consultation	<p>Chetwynd: Support Allocation –importance of constraining the scale of retail to that of a ‘small neighbourhood centre’ (as proposed) cannot be understated. The vitality and viability of existing local centres such as Stapleford and Sandiacre will rely on the supply of retail within the development being proportionate to the need of the incumbent population and sensitive to the existing hierarchy of retail centres across the wider area.</p> <p>Future proposals should utilise existing and, where necessary, accommodate new public transport options to minimise wider and longer term private car use.</p> <p>Support provision of Green Infrastructure including link to Strategic Location for Growth.</p>	<p>Broxtowe welcome the support from Erewash Borough Council with regards to the potential Chetwynd site allocation. This allocation was carried forward into the publication version of the Part 2 Local Plan.</p> <p>The emphasis on non- private car use has been incorporated into the ‘Key Development Requirements’ for the specific site allocation.</p> <p>The importance of the size of the local center was incorporated into the ‘Key Development Requirements’ for the specific site allocation and the size threshold for the ‘out-of-town’ retail provision being ‘capped’ at 500 gross square meters.</p>
February	Brinsley Alternative	No representations made.	

2017	Site Consultation	
September 2017	Publication	No strategic concerns raised

Gedling Borough Council

When they were consulted	What they were consulted on	What they Said	What has happened subsequently / What we did in response
November 2013	Site Allocations Issues and Options Consultation	No representations made.	
Autumn 2014	Green Belt Review Framework	No representations made.	
February 2015	Preferred Approach to site allocations: Green Belt Review Consultation	No representations made.	
February 2015	Development Management Policies Issues and Options Consultation	No representations made.	
November 2015	Strategic Location for Growth at Toton Consultation	No representations made.	
August 2016	Site Allocations Potential Additional Sites Consultation	No representations made.	
February 2017	Brinsley Alternative Site Consultation	No representations made.	
September 2017	Publication	<p>Consider that Broxtowe Borough Council has fulfilled its Duty to Cooperate.</p> <p>The evidence indicates that the housing supply and P2LP allocations are more than sufficient to meet the ACS requirement of 6,150 both in quantity and by location.</p>	Noted.

Ashfield District Council

When they were consulted	What they were consulted on	What they Said	What has happened subsequently / What we did in response
November 2013	Site Allocations Issues and Options Consultation	<u>Housing / General Development</u> Housing mix and density should be determined on a site by site basis supported by an up-to-date assessment of local need.	Noted
		<u>Brinsley Generally</u> Any development in Brinsley would impact upon the infrastructure in Underwood and possibly Jacksdale.	The site allocated is in line with ADCs request
		<u>197 – North of Cordy Lane Brinsley</u> Concern about coalescence with Underwood if whole of site is developed.	Site not allocated
		513 - Land belonging to Stubbing Wood Farm Watnall <ul style="list-style-type: none"> Any future development contributions from this site should be made available to Ashfield DC as development would affect the services and infrastructure in Hucknall. 	Site not allocated
		Economic Issues/Job Creation Additional employment allocations should not be made so long as there is an enabling policy to deliver business growth not in the plan.	Employment allocations are in line with the requirement in the ACS and will not adversely impact on ADC
		Climate Change Specific sites for renewable energy should not be allocated because flexibility is required to adapt to the ever changing renewable industry.	Sites not allocated
		Community Facilities <ul style="list-style-type: none"> Certainty in private investment through planning process is needed to ensure implementation. Should be linked to master planning for the whole area to 	Addressed through specific allocations

		create sustainable communities.	
		Healthy Living <ul style="list-style-type: none"> Sites need to be considered alongside other development GI should be driven by local evidence base. 	Addressed through specific allocations and Green Infrastructure policy 28
		Transport <ul style="list-style-type: none"> No size threshold should be applied and should be dictated by viability. 	Addressed through application process.
January / February 2015	Meetings with Nottingham City and Ashfield District Councils to discuss and agree a joint approach to cross-boundary Green Belt between settlements.	Agreed Joint approach	
February 2015	Preferred Approach to site allocations: Green Belt Review Consultation	ADC were a partner in this consultation.	
February 2015	Development Management Policies Issues and Options Consultation	No representations made.	
November 2015	Strategic Location for Growth at Toton Consultation	No representations made.	
August 2016	Site Allocations Potential Additional Sites Consultation	No representations made.	
February 2017	Brinsley Alternative Site Consultation	ADC have concerns regarding the impact of Option 2 on the Green Belt between Brinsley and Underwood. Policy 3 of the Greater Nottingham Aligned Core Strategy (ACS) indicates that the principle of the Nottingham Derby Green Belt will be retained. Section 3 of Policy 3 indicates that, in reviewing Green Belt boundaries, consideration will be given to:	These comments have been addressed in the submission version of the Plan.

		<ul style="list-style-type: none"> a) The statutory purposes of the Green Belt , in particular the need to maintain the openness and prevent coalescence between Nottingham, Derby and other surrounding settlements; b) Establishing a permanent boundary which allows for development in line with the settlement hierarchy and/or to meet local needs; c) The appropriateness of defining safeguarded land to allow for longer term development needs; and d) Retaining or creating defensible boundaries. e) <p>ADC is of the opinion that the proposed Brinsley Option 2 consultation site would have an adverse effect on the coalescence of Brinsley and Underwood. Policy 3 of the ACS identified the prevention of coalescence as an important consideration in reviewing Green Belt boundaries. The 2015 Green Belt Review undertaken by Broxtowe indicates that the area scores very high in Green Belt terms with regard to the merging of settlements. Development would directly adjoin Ashfield's boundary and would go beyond the built up area in Brinsley towards Underwood's settlement boundary.</p> <p>ADC was proposing to allocate land at Winter Closes in Underwood in the 2013 withdrawn Ashfield Local Plan. The Council has now determined that the site is not suitable because it scores very high in relation to merging of settlements (Underwood and Brinsley) in the 2015 Ashfield Green Belt Review. It should be noted that, in the interests of good planning practice and the Duty to Cooperate, a requirement in the 2011 Localism Act, Ashfield has worked closely with Broxtowe to ensure a consistent approach to reviewing Green Belt boundaries. The site assessments undertaken should play a crucial</p>	
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		<p>role in determining which sites are the most appropriate in Green Belt terms.</p> <p>As part of their response (letter dated 14th October 2013) to the public consultation on the 2013 withdrawn Ashfield Local Plan, Brinsley Parish Council objected to the proposals to allocate Winter Closes. One of their reasons related to the effect it would have on the coalescence between Brinsley and Underwood. The Parish indicated that:</p> <p><i>“This initial development, therefore, could lead to significant further development which will give the risk of coalescence between the two villages of Underwood and Brinsley which would be completely unacceptable as we would then lose the separation between the two villages and Brinsley is one of the last true villages in Broxtowe surrounded by Green Belt on all sides”.</i></p> <p>Brinsley Parish Council’s response to Selston Neighbourhood Area Consultation in 2013 in relation to Winter Closes proposed allocation stated that their proposal, to remove Winter Closes, would ensure that the narrow Green Belt gap between the two villages is removed from consideration for development purposes, which is to the benefit of both communities and in line with National Planning Practice Guidance concerning the prevention of coalescence of settlements. The allocation of the Option 2 site would clearly go against Brinsley Parish Councils Commitment to protect the narrow Green Belt gap between Brinsley and Underwood.</p> <p>In conclusion, ADC has concerns that the allocation of Option 2 would significantly reduce the gap between Underwood and Brinsley. Both Ashfield’s and Broxtowe’s Green Belt Assessments for the area</p>	
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		between Underwood and Brinsley have scored very high with regard to merging of settlements. The prevention of coalescence is a key priority in terms of Green Belt Policy.	
September 2017	Publication	No issues raised	

Bolsover District Council:

When they were consulted	What they were consulted on	What they Said	What has happened subsequently / What we did in response
Jointly prepared by the HMA Councils	Green Belt Review Methodology	Bolsover District Council: No objections to the methodology.	Noted

No representations made to any other consultations.

Nottinghamshire County Council

When they were consulted	What they were consulted on	What they Said	What has happened subsequently / What we did in response
November 2013	Site Allocations Issues and Options Consultation	Housing / General Development <ul style="list-style-type: none"> Stress importance of good design and layout of new development, this should include the provision of supporting waste infrastructure and integrating heat and/or power from other developments where viable. 	Policy 1 of the ACS and Policy 1 of this Local Plan give sufficient steer to these issues.
		190 – North of Barlows Cottages Awsworth <ul style="list-style-type: none"> Significant part of site covered by SINC 2/256 – species-rich neutral grassland which would need to be protected from development. 	Site not allocated for housing
		192 - West of Awsworth Lane South of Newtons Lane Cossall <ul style="list-style-type: none"> Area covered in rough grassland, scrub and hedgerows which may have nature conservation value and may support protected species. 	Site not allocated for housing
		197 – North of Cordy Lane Brinsley <ul style="list-style-type: none"> Adjacent SINC 5/2328 and SINC 2/167 – mitigation for indirect impacts would be required which could include buffer zone. 	Site not allocated for housing
		198 – East of Church Lane Brinsley <ul style="list-style-type: none"> Adjacent SINC 5/2302 – mitigation for indirect impacts would be required including significant corridor/buffer along Brinsley Brook 	Much smaller site allocated in part to take on board the NCC comments
		376 - Land opposite 28 Church Lane Brinsley	AS above

		<ul style="list-style-type: none"> Adjacent SINC 5/3405 – mitigation for indirect impacts would be required which could include buffer zone. 	
		<p>3 – Wade Printers (and adjacent land) Baker Road</p> <ul style="list-style-type: none"> Adjacent SINC 5/273 – questions extent of SINC boundary Mitigation for indirect impacts would be required which could include buffer zone. Mitigation for direct impact may involve reduction in developable space. 	Site not allocated for housing
		<p>125 - Land at Church Street Eastwood</p> <ul style="list-style-type: none"> Remnant area of neutral grassland which may have conservation value. 	Urban site (and not allocated in this Local Plan) but points will be addressed through the development management process
		<p>130 - Church Street Eastwood (Raleigh)</p> <ul style="list-style-type: none"> Area of grassland and scrub which may have conservation value. 	Urban site (and not allocated in this Local Plan) but points will be addressed through the development management process
		<p>138 - Walker Street Eastwood</p> <ul style="list-style-type: none"> Area of grassland, scrub and post-industrial habitat which may have conservation value. 	Site allocated in full co-operation (and agreement) from NCC who are the owners of this site.
		<p>143 - South of Smithurst Road Giltbrook</p> <ul style="list-style-type: none"> Area of grassland and scrub which may have conservation value. 	Urban site (and not allocated in this Local Plan) but points have been addressed through the development management process
		<p>146 – Chewton Street Newthorpe</p> <ul style="list-style-type: none"> Area of grassland and hedgerows which may have conservation value. 	Urban site (and not allocated in this Local Plan) but points will be addressed through the development management process
		<p>203 – Nether Green East of Mansfield Road Eastwood</p> <ul style="list-style-type: none"> Adjacent SINC 2/259 – mitigation for indirect impacts would be required which could include 	Site not allocated for housing

		buffer zone. <ul style="list-style-type: none"> Area of grassland and hedgerows which may have conservation value. 	
		204 – North of 4 Mill Road Beauvale <ul style="list-style-type: none"> Area of grassland and hedgerows which may have conservation value. 	Site not allocated for housing
		206 – East of Baker Road/North of Nottingham Road Giltbrook <ul style="list-style-type: none"> Part of site covered by SINC 2/274 – marshy grassland which would need to be protected from development. Adjacent SINC 5/253 – mitigation for indirect impacts would be required which would include significant green corridor/buffer along the Brinsley Brook. Area of grassland and hedgerows which may have conservation value. 	Site not allocated for housing
		313 - Brookhill Leys Farm Eastwood <ul style="list-style-type: none"> Adjacent SINC 2/245 – mitigation for indirect impacts would be required which could include buffer zone. 	Urban site (and not allocated in this Local Plan) but points will be addressed through the development management process
		519 - Land off Thorn Drive & West of the Pastures Newthorpe <ul style="list-style-type: none"> Area of grassland and scrub which may have conservation value. 	Site not allocated for housing. This is protected by Policy 28 as open space and land for flood mitigation if required.
		103 – Land east of New Farm Lane Nuthall <ul style="list-style-type: none"> Site entirely covered by SINC 5/753 – species-rich calcareous grassland which should not be developed. 	Site not allocated for housing

		105 - Land west of New Farm Lane Nuthall <ul style="list-style-type: none"> Area of grassland which may have conservation value. 	Site not allocated for housing
		131 - Church Hill Kimberley <ul style="list-style-type: none"> Site entirely covered by SINC 2/276 – species-rich neutral grassland which should not be developed. 	Eastern part of the earlier proposed allocation to remain in the Green Belt. The railway embankment now forms the western boundary of the site
		144 - South of Eastwood Road Kimberley <ul style="list-style-type: none"> Area of grassland and trees which may have conservation value. 	Previously allocated site and development area reduced to preserve Green Infrastructure
		145 – Land between 3 and 12 Hardy Close Kimberley <ul style="list-style-type: none"> Adjacent Kimberley Railway Cutting SSSI and SINC 2/71 Mitigation for indirect impacts would be required which could include buffer zone. Area of grassland which may have conservation value. 	Urban site (and not allocated in this Local Plan) but points will be addressed through the development management process
		215 - Land adjacent to Kimberley Depot Eastwood Road Kimberley <ul style="list-style-type: none"> Site partly covered by SINC 2/140 – disused railway which would need to be protected from development. Area of grassland, hedgerows and scrub which may have conservation value. 	Site proposed to be allocated but will not come forward until later in the plan period and comments will be fully addressed through the details of any application. No development will take place on the embankment as it will not be practical to do so.
		218 - South of Kimberley Road Nuthall <ul style="list-style-type: none"> Great Crested Newts believed to be in pond on site. 	Points addressed through the development management process
		234 - Land at New Farm Nuthall <ul style="list-style-type: none"> Site entirely covered by SINC 5/753 – species-rich calcareous grassland which should not be developed. 	Site not allocated for housing

		271 - Gilt Hill Farm Kimberley <ul style="list-style-type: none"> Area of grassland and hedgerows which may have conservation value. 	Site not allocated for housing
		285 - Land north of Alma Hill west of Millfield Road Kimberley <ul style="list-style-type: none"> Area of grassland and mature hedgerows which may have conservation value. 	Site not allocated for housing
		411 - 2 High Street Kimberley <ul style="list-style-type: none"> Adjacent SINC 2/140 mitigation for indirect impacts would be required which could include buffer zone. Area of grassland and scrub which may have conservation value. 	Eastern part of the earlier proposed allocation to remain in the Green Belt. The railway embankment now forms the western boundary of the site
		428 – Rear of Chilton Drive Watnall <ul style="list-style-type: none"> Adjacent Kimberley Railway Cutting SSSI and SINC 2/71 Mitigation for indirect impacts would be required which could include buffer zone. 	Points addressed through the development management process
		586 – Kimberley Brewery <ul style="list-style-type: none"> Area of woodland which may have conservation value. 	Points addressed through the development management process
		104 – Land off Coventry Lane Bramcote <ul style="list-style-type: none"> Site partly covered by SINC 2/6 –canal which would need to be protected from development. 	Site not allocated for housing
		107 - Land at Woodhouse Way Nuthall <ul style="list-style-type: none"> Site partly covered by SINC 5/755 –woodland which would need to be protected from development. 	Site not allocated for housing
		108 - Field Farm north of Ilkeston Road Stapleford <ul style="list-style-type: none"> Adjacent SINC 5/1086 mitigation for indirect impacts 	Site allocated in the Core Strategy and points fully addressed through the development management

		<p>would be required which could include buffer zone.</p> <ul style="list-style-type: none"> Area of grassland and scrub which may have conservation value. 	process. Construction now underway on site.
		<p>111 – Land off Moss Drive Bramcote</p> <ul style="list-style-type: none"> Adjacent SINC 5/1086 mitigation for indirect impacts would be required which could include buffer zone. Area of grassland and scrub which may have conservation value. 	Site not allocated for housing
		<p>220 - Land east of Low Wood Road Nuthall</p> <ul style="list-style-type: none"> Site partly covered by SINC 2/57 – parkland, grassland, woodland and ponds which would need to be protected from development. 	Site not allocated for housing
		<p>258 – Land at Lilac Grove Beeston</p> <ul style="list-style-type: none"> Area of grassland and scrub which may have conservation value. 	Urban site expected to come forward in the later stages of this Local Plan. Issues will be fully addressed through the development management process.
		<p>298 – Spring Farm Nottingham Road Trowell Moor</p> <ul style="list-style-type: none"> Prominent Area for Special Protection identified under constraints heading Landscape Quality and Character which has not been defined or referenced in the documents. 	Site not allocated for housing
		<p>410 - South of Baulk Lane Stapleford</p> <ul style="list-style-type: none"> Area of grassland and scrub which may have conservation value. 	Site not allocated for housing
		<p>Toton - (133, 254, 259, 403, 132, 407 & 358) Site 358</p> <ul style="list-style-type: none"> Partly covered by SINC 5/2210 –mosaic of habitats on railway sidings which would need to be protected from development. 	Toton Strategic Location for Growth allocated following full dialogue with the County Council including protections for nature conservation/ green Infrastructure.

		<p>Site 133</p> <ul style="list-style-type: none"> • Adjacent SINC 5/2210 mitigation for indirect impacts would be required which could include buffer zone. 	
		<p>189 - Land at Smithfield Avenue Trowell</p> <ul style="list-style-type: none"> • Site partly covered by SINC 2/6 –canal which would need to be protected from development. • Area of grassland, hedgerows and scrub which may have conservation value. 	Site not allocated for housing
		<p>513 - Land belonging to Stubbing Wood Farm Watnall</p> <ul style="list-style-type: none"> • Adjacent SINC 2/319 mitigation for indirect impacts would be required which could include buffer zone. • Area of grassland and scrub which may have conservation value. 	Site not allocated for housing
		<p>Economic Issues/Job Creation</p> <ul style="list-style-type: none"> • Local employment policies should make adequate provision for waste management and waste related development and would welcome the opportunity to discuss suitability of existing or proposed employment sites. 	Sites available and full dialogue with NCC ongoing regarding their role as the waste planning authority.
		<p>Enhancing the Environment</p> <ul style="list-style-type: none"> • Undesignated sites may have ecological value • Ecological assessments of sites should be carried out before they are allocated for development. • Sites that consist wholly or partly of SINCs should not be considered further. 	Noted and Policy 31 of the Local Plan has been amended to better protect ecological value
		<p>Transport</p> <ul style="list-style-type: none"> • Individual development sites should be accompanied by a site specific Transport Assessment (or transport 	Comments addressed through allocation work and there is sufficient policy seer to enable these matters to be adequately addressed through the development

		<p>statement for smaller sites) and a cumulative impact transport assessment (where small sites are clustered together).</p> <ul style="list-style-type: none"> • Transport impact of the total quantum of development on non-strategic sites has already been taken into consideration (through the CS). • All development will need to contribute towards a package of transport infrastructure required to support new development in the Borough (as set out in the Broxtowe Infrastructure Delivery Plan). 	management process
		<p>Local plans should include policies on minerals safeguarding and consultation areas.</p>	<p>Broxtowe has incorporated the request to include a policy on minerals safeguarding and consultation areas into the Part 2 Local Plan Policy 22: Minerals which states that;</p> <p><i>“Development will not be permitted which would needlessly sterilise mineral resources of economic importance or pose a serious hindrance to future extraction in the vicinity”.</i></p> <p>The justification text 22.1 recognises the minerals safeguarding and consultation areas and shows them on map 40.</p>
		<p>Omission of specific policy on developer contributions – would welcome involvement in CIL development.</p>	<p>Broxtowe has incorporated the request to include a policy on developer contributions into the Part 2 Local Plan Policy 32: Developer Contributions.</p> <p>Broxtowe Borough Council is yet to determine whether to develop a Community Infrastructure Levy (CIL). If a</p>

			CIL is developed then Nottinghamshire County Council will be consulted.
		Landscape Character Assessment within the Infrastructure Delivery Plan Constraints/Requirement summary.	
		<p>No subheading or reference to Landscape Character in locally distinctive issues.</p> <p>Site constraints often reference 'N/A' for landscape quality and character.</p> <p>A more informed & consistent approach to landscape quality and character required.</p>	Up to date landscape character work was undertaken to support this local plan. This has informed policies and allocations.
		<p>Employment Sites</p> <ul style="list-style-type: none"> • E31 – covered by SINC 2/140 & SINC 2/276 areas of disused railway and species-rich neural grassland which need to be protected from development. • E35 – adjacent SINC 2/245, mitigation would be required which may include buffer zone. • E36 – significant part of site grassland and scrub which may have nature conservation value. • E30 - significant part of site woodland which may have nature conservation value. <p>E31 – Partly covered by SINC 2/140 & SINC 2/276 site contains grassland and scrub which may have nature conservation value.</p>	Issues will be addressed through the development management process
		The County Council welcome the opportunity of cross boarder infrastructure working, to ensure that the facilities	

		meet the needs of the communities. E.g. Rolls Royce (p157), Clifton, (p160) (Not an exclusive list).	
		<p>Stapleford / Bramcote;</p> <ul style="list-style-type: none"> • Boundary too superficial when considering Green Belt Criteria • New boundary in this area should be based on a strong feature having regard to long term unforeseen development requirements and endure for long term e.g. 30 years • Boundary should follow east-west railway line providing a proper long term physical definition. • Should be considered as part of the urban area but not necessarily identified for development. <p>Urban spaces, playing fields etc. can be adequately protected by other policies – other land can be identified as safeguarded.</p>	The Green Belt boundary does follow the railway line and there are no outstanding issues for this allocation with the County Council.
		<p>Possible new policy: Coal – Mineral Safeguarding Areas</p> <p>“The County Council welcomes the inclusion of a policy on minerals safeguarding. In order to maintain consistency with the emerging Minerals Local Plan, account should be taken of policy DM13 ‘Mineral safeguarding and consultation areas’ and any subsequent amendments as the Minerals Plan progresses.”</p> <p>“It is also important to note that Para 143 point 3 of the NPPF states that as well as defining Minerals Safeguarding Areas, Minerals Consultation Areas (based on the Minerals Safeguarding Areas) should be included.”</p>	Ongoing dialogue with the County Council regarding their role as minerals planning authority and no further policy amendments are needed for this Local Plan. Coal safeguarding areas are shown on the policies map.

		<ul style="list-style-type: none"> It is also worth noting that a sand and gravel safeguarding area exists in the south of the district which you may wish to consider.” 	
Autumn 2014	Green Belt Review Framework	<p>H6: Density of housing development</p> <p>“The County Council recommends that reference to public transport accessibility appraisal mechanisms is essential for sustainable developments, and to ensure the long term viability of a development in terms of public transport provision”</p>	<p>Broxtowe has incorporated the request into the Part 2 Local Plan and which can now be seen in Policy 22: Minerals.</p> <p>Care has been taken as Broxtowe is not the Minerals Planning Authority, Nottinghamshire County Council is.</p> <p>At the time of the publication of the Broxtowe Part 2 Local Plan the Nottinghamshire County Council Minerals local plan has been withdrawn from Examination. However, the County Council have advised that the Minerals safeguarding and consultation areas cover the same geographic area and this is based on the economic mineral resource as identified by the British Geological Survey, this is the data that Broxtowe have applied.</p>
February 2015	Preferred Approach to site allocations: Green Belt Review Consultation	<p>T1: Developers’ contributions to integrated transport measures</p> <p>“Any new approach should ensure that public transport provision is prioritised as part of any future policy development.”</p>	Noted. This relates to a requirement for high densities that may not be viable or appropriate in all locations.
		<p>T4: Park-and-ride facilities</p> <ul style="list-style-type: none"> “The Council isn’t currently considering any future 	This may be problematic in relation to s106 ‘pooling restrictions’.

		Park & Ride developments in Broxtowe.”	
February 2015	Development Management Policies Issues and Options Consultation	T5: South Notts Rail Network (SNRN) The policy is listed in a schedule of comments; however no comments on this policy are actually made.	Noted and points will be considered.
		T6: Nottingham Express Transit (NET) The policy is listed in a schedule of comments; however no comments on this policy are actually made.	
		T12: Facilities for people with limited mobility “It is important that the [County] Council can negotiate with developers for contributions to include such facilities as part of developments i.e. raised kerbs, audio and visual information. The Council requests the inclusion and retention of Policy T12.”	Policy not needed as this issue will be addressed through good inclusive design in Policy 17
		Possible new policy: Sustainable transport networks “Any single policy should include reference to the role of accessible public transport networks as part of a sustainable transport framework.”	This may be problematic in relation to s106 ‘pooling restrictions’.
		Possible new policy: Travel plans “The inclusion of a local policy setting out what is considered to be “significant” is supported.”	Noted
		E16: Sites of Importance for Nature Conservation The policy “should certainly be retained, or incorporated into a ‘natural environment policy (see below).”	Broxtowe has incorporated the request into the Part 2 Local Plan Policy 26: Travel Plans which states that; <i>“All developments of 10 or more dwellings or 1,000 square meters or more gross floorspace will be expected to submit a Travel Plan with their application.”</i>
		Possible new policy: Green infrastructure	Broxtowe has incorporated the request into the Part 2

		<p>“A policy relating to the natural environment (i.e. beyond just locally designated sites) [and so presumably potentially part of a new GI policy] is also required, which could incorporate policy E16, above.” In addition, the policy would need to : ensure that impacts on biodiversity are minimised; contribute to the establishment of coherent ecological networks; set criteria against which proposals affecting designated wildlife sites will be judged; plan positively for networks of biodiversity and GI; plan for biodiversity at a landscape scale across local authority boundaries; identify and map components of ecological networks; promote the preservation, restoration and re-creation of priority habitats; promote the recovery of populations of priority species; identify suitable monitoring indicators; prevent harm to geological conservation interests; and “make provision for an Nature Improvement Areas which may be identified in the plan area in the future”.</p>	<p>Local Plan and which can now be seen in Policy 28: Green Infrastructure Assets and Policy 31: Biodiversity Assets which in combination seek to protect important biodiversity assets whilst creating/enhancing GI routes.</p>
		<p>H5: Affordable housing “The County Council welcome the issue of whether a consistent Borough Wide approach is appropriate, this will help when considering viability issues/priorities relating to the delivery of new housing sites.”</p>	<p>Noted</p>
		<p>EM1 (?) New employment sites and/or RC2 and RC3 Community and education facilities “Paragraph 3.4.21 (p38) the County Council welcome the plans for “specific provision” for education which is also supported in Policy RC2 and RC3 (p55-56). Where ‘Reference to particular sites will need updating’ is included. The Capacity of schools sites to allow for further expansion</p>	<p>Noted</p>

		is an issue that is changing over the duration of the plan period.”	
		<p>RC5: Protection of open spaces The policy does “not provide an adequate framework, standards or criteria for an objective determination of the role and value of open spaces in new development...There needs to be a very clear relationship between the demographic projections of the local areas and the open spaces required – a PPG 17 type study which is only partly reported in the Council’s Green Spaces Strategy 2009-16.”</p>	<p>Paragraph 3.4.21 of the Aligned Core Strategy, which is referred to on page 38 of our consultation document with regard to policy EM1, is about the ‘knowledge based economy’; unclear what “specific provision” is referring to; and unclear as to the perceived relationship between employment and education policies. Further discussions have been held with Nottinghamshire County Council.</p>
		<p>RC6: Open space: requirements for new developments The policy does “not provide an adequate framework, standards or criteria for an objective determination of the role and value of open spaces in new development...There needs to be a very clear relationship between the demographic projections of the local areas and the open spaces required – a PPG 17 type study which is only partly reported in the Council’s Green Spaces Strategy 2009-16.”</p>	<p>Broxtowe has incorporated the request into the Part 2 Local Plan and which can now be seen in Policy 27: Local Green Space and Policy 28: Green Infrastructure Assets. Including the justification text 16.13 which links the distance from households to different types of Green Space and states that;</p> <p><i>“16.13 The need for the provision and maintenance of playing pitches, and associated developer contributions, will be assessed on a case-by-case basis, using evidence from the Playing Pitch Strategy (PPS, adopted in January 2017) and the Green Infrastructure Strategy (GIS, adopted in January 2015).”</i></p>
November 2015	Strategic Location for Growth at Toton Consultation	No representations made.	
August 2016	Site Allocations Potential Additional	Bramcote: A coal Minerals Safeguarding Area/Minerals Consultation Area covers the entirety of the site. There it is	Ongoing dialogue with the County Council regarding their role as minerals planning authority and no further

	<p>Sites Consultation</p> <p>important to avoid the needless sterilisation of economically important mineral reserves and to ensure that development would not pose a serious hindrance to future extraction. Where there is need for non-minerals development prior extraction should be sought where practicable.</p> <p>Note that site contains the Bramcote Quarry and Landfill – site restoration has been completed. County Council acknowledge the identified desire for further development and improvements to the site restoration as part of wider green infrastructure enhancements.</p> <p>Need to provide good access to health and social facilities – in Bramcote many of the health indicators are similar or no better than the England average.</p> <p>Area identified is larger than that which might be required, wider area includes several local wildlife sites and local nature reserves. Area hatched for residential development includes Bramcote Moor Grasslands Local Wildlife Site (LWS). This LWS appears to be last vestige of the Bramcote Moor (which once existed in the area) shown on historic maps. The LWS are of at least county-level importance and would need to be retained in its entirety. If this were not possible the County Council would object to the allocation of the site.</p> <p>Further information could be provided regarding the value of the LWS and how its interest would be protected (e.g. by incorporating into public open space and securing long term positive management).</p>	<p>policy amendments are needed for this Local Plan. Coal safeguarding areas are shown on the policies map.</p> <p>The allocation at Bramcote has been reached in full dialogue with NCC. See previous comments regarding review and mitigation for the LWS.</p>
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		<p>Should be designed to include good non-motorised permeability and where possible pass through public open space and green corridors with good natural surveillance.</p> <p>Heritage List should make reference to site of Bramcote Hall and the design landscape that is an un-designated heritage asset.</p> <p>Further detailed transport assessments required. County Council is likely to request developer contribution to provide bus service to serve the development adequately.</p>	
		<p>Chetwynd: A coal Minerals Safeguarding Area/Minerals Consultation Area covers the southern part of the site. There it is important to avoid the needless sterilisation of economically important mineral reserves and to ensure that development would not pose a serious hindrance to future extraction. Where there is need for non-minerals development prior extraction should be sought where practicable.</p> <p>Need to provide good access to health and social facilities – for Chetwynd Barracks many of the health indicators are similar or no better than the England average.</p> <p>Existing mature vegetation on site should be retained and incorporated into the development where possible. Hobgoblin Wood and adjacent Local Wildlife Site (LWS) are to be retained which is welcomed. Opportunities for</p>	<p>Site has been allocated in full dialogue with NCC who are supportive of the allocation</p>

		<p>significant Green Infrastructure improvement should be pursued.</p> <p>Should be designed to include good non-motorised permeability and where possible pass through public open space and green corridors with good natural surveillance. Bridleway network in Broxtowe is segmented and north-south bridleway through site would be an excellent addition to the network.</p> <p>Further detailed transport assessments required.</p> <p>County Council is likely to request developer contribution to provide bus service and a bus stop to serve the development adequately including penetrating into the site to ensure that all new residents have access to quality public transport and infrastructure.</p> <p>Nuthall: Oppose Allocation - Need to provide good access to health and social facilities – in Nuthall many of the health indicators are worse than the England average with all-cause death aged under 65 and 75 both being statistically worse than the England average and therefore improvements are particularly important.</p> <p>Serious concerns regarding Sellers Wood SSSI would be abutted by new development (approx. 630m). Buffer indicated by no suggestion of how broad this would be. Development would have a serious urbanising effect on a site that is of regional importance for wildlife. Concern regarding increased public access pressure, potential for fly-tipping of garden waste, predation of wildlife by pets,</p>	<p>Site not allocated for housing</p>
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		<p>general disturbance by noise and artificial lighting, potential air quality impacts etc. Development also restricts opportunities for woodland expansion/linking and may compound the effects of HS2.</p> <p>County Council would object to the allocation of this site.</p> <p>List of heritage constraints should include the site of the Grade II listed Blenheim Farm (within the city of Nottingham). Allocation would also be in an area associated with early coal mining, for which there are a number of records close by showing on the Nottinghamshire Historic Environment Record.</p> <p>Further detailed transport assessments required.</p> <p>County Council is likely to request developer contribution to provide bus service and bus stop to serve the development adequately.</p>	
February 2017	Brinsley additional site consultation	<p>As raised at previous stages of consultation, the adopted (and emerging) Minerals and Waste Local Plans form part of the development plan for the area and as such need to be considered as part of the development of the Part 2 Local Plan. The County Council will not reiterate the points already made at previous stage, instead would highlight the following points relating specifically to the Option 2 site:</p> <ul style="list-style-type: none"> - The site lies within a Minerals Safeguarding and Consultation Area for Coal (as per Policy DM13 of the emerging Minerals Local Plan). The reference to the presence of coal under 'other' in the consultation document is welcomed. The County Council would refer to the views of 	<p>Broxtowe note the strong objection from the County Council and as a result of the consultation response the site was not carried forward into the Part 2 Local Plan.</p>

		<p>The Coal Authority in terms of assessment the impact of the development against Policy DM13.</p> <p>- There are no existing waste facilities in the vicinity of the site which would raise an issues in terms of safeguarding in line with Policy WCS10 of the adopted Waste Core Strategy.</p> <p><u>Nature conservation</u> - Option 2 is not covered by any nature conservation designations. However, the Winter Close Grassland, New Brinsley LWS (5/2328) abuts part of the north-western boundary of the proposed allocation and would need to be protected during development. The site appears to be dominated by improved (or possibly semi-improved) grassland, bounded by hedgerows and has some potential to support protected species; as such, a Preliminary Ecological Appraisal of the site should support any planning application. The site layout should be designed to retain existing features such as trees and hedgerows.</p> <p><u>Right of Way</u> - There are no recorded public rights of way over Option 2.</p> <p>The County Council would take this opportunity to inform the District Council that Brinsley Footpath No 31 crosses Option 1. The route on the ground is understood to deviate from the route shown on the Definitive Map. Should this option be taken forward, this discrepancy should be noted and any future developer advised of such.</p> <p><u>Landscape and visual impact</u> (comments provided by Via East Midlands on behalf of the County Council) - As with</p>	
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		<p>Option 1, Option 2 lies within Policy Zone NC03 (Selston and Eastwood Urban Fringe Farmland) within the Nottinghamshire Coalfield Character Area. The overall landscape strategy is to enhance. Any development of this site should following the recommended Landscape Actions where possible. Winter Close BioSINC/LWS lies to the north of the site (neutral grassland). Ecological surveys should be carried out, including recommended mitigations measures. Visual impact on existing residents along Cordy Lane and Broad Lane should be considered.</p> <p>Option 2 provides a more integrated extension to the village than Option 1, which was to the east of the A608.</p> <p><u>Public Health</u> -Detailed comments on the links between planning and health were provided as part of the County Council's response to the previous Additional Sites Consultation. Further to these general comments, in terms of the Option 2 site, the relevant local health report can be found attached. This sets out the health profile of the local area and shows that many of the indicators for the area local to the site are 'not better than the England average'.</p> <p>As with all sites being considered for allocation, it is recommended that the relevant Local Estate Forum and Clinical Commissioning Group be consulted on the proposals in terms of the likely additional healthcare requirements that will be generated as a result of the development of the site(s). Further details on the impact of proposals at this site on public health will be provided when more details are</p>	
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		<p>available at the planning application stage.</p> <p><u>Strategic Highways</u> - The County Council has no comments to make on the alternative site in relation to strategic transport planning.</p>	
September 2017	Publication	<p>Generally supportive but raise issues specific to dealing with the Chetwynd and Toton allocations in a coordinated manner (policies 3.1. And 3.2), the provision of infrastructure and concern regarding potential housing on the Local Wildlife Site at Bramcote</p>	<p>These issues are substantially resolved. Amendments to the Chetwynd and Toton allocations especially in relation to the provision of infrastructure have fully taken on board the comments of the County Council and the LWS at Bramcote has been reviewed with details in the SA. A small section on the south west of the site is of most ecological interest and this will form part of a green infrastructure corridor, and an additional Key Development Requirement in Policy 3.3 that any loss of the LSW land is mitigated/ compensated at equivalent quality within close proximity to its current location.</p>

Derbyshire County Council

When they were consulted	What they were consulted on	What they Said	What has happened subsequently / What we did in response
November 2013	Site Allocations Issues and Options Consultation	No representations made.	
Autumn 2014	Green Belt Review Framework	No representations made.	
February 2015	Preferred Approach to site allocations: Green Belt Review Consultation	No representations made.	
February 2015	Development Management Policies Issues and Options Consultation	No representations made.	
November 2015	Strategic Location for Growth at Toton Consultation	<ul style="list-style-type: none"> • The ACS has been through a rigorous examination process in front of a Local Plan inspector and the scale of housing and employment development has been deemed appropriate. • Broad area of housing proposed for allocation would form logical sustainable urban extension to the existing area of Toton. • If the housing allocation were increased significantly above 500 dwellings there could be potential adverse effects on future housing delivery in Erewash 	Agree with almost all of their comments. The one exception is the 18,000 square metres of employment provision which is considered can be enhanced without competing with city centres, or impeding the delivery of other sites such as Stanton. An increase in economic potential to include the DB Schenker site has significant potential to assist in the delivery of Stanton to encourage the relocation of the existing rail connected uses to Stanton. In addition any economic development at this location

		<p>(particularly Long Eaton, Sandiacre and possibly Stanton Ironworks).</p> <ul style="list-style-type: none"> • The level of employment land (18,000sqm) appears to be pitched at around the right level; any substantial increase could have potential consequences on the attraction of employment land to investors in Erewash (particularly Long Eaton and Stanton Ironworks). • Much of the area included in the allocation is Green Belt and it is important that any masterplanning incorporates significant areas of landscaping and open space to form separation between Toton, Stapleford, Long Eaton and Chilwell. • An increase in employment and housing development is likely to have an impact on the amount of open space and landscaping. • Connectivity proposals do not conflict with Derbyshire County Council plans and are broadly supported. • Concerned that there should be connectivity through the site and not just to the station. • Bus operators have indicated that they would wish to serve the station as part of a through service rather than at the end of a spur. • Mention of NET extending through the site but suggest that we would want to safeguard high-standard routes through the site for buses, walking and cycling and local connections from adjacent housing and employment areas. 	<p>should be complementary and not compete with that offered at other locations including Long Eaton, Stanton and the city centres.</p>
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		<ul style="list-style-type: none"> • Much of our literature relates to S106 agreements but we might want to use the term 'developer contributions' to provide flexibility in the future should we wish to adopt CIL. • Support approach to allow the school to expand if required. • Concern that there could be an impact on Derbyshire schools due to proximity of the site to the boundary and would wish for assessment of impact to be undertaken, in addition to potential pupils of Derbyshire wishing to attend new primary school/ extended secondary. • Greater consideration should be given to the impact on waste management facilities. There is no mention of current provision and whether that needs to be improved. • Any development should take into account the potential impact on Erewash especially; Erewash Canal, Nutbrook Trail, local residents and the Sandiacre Lock Conservation Area. This part of Erewash is also part of the Erewash Green Belt. • Any development should take into account the effect on landscape character. • Opportunities are supported; to expand green infrastructure network around the site, to link the west with the Erewash Valley and Canal, and where development would be designed to have full regard to maintaining the landscape and character of the 	
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		<p>Riverside Meadows and the character and appearance of the Conservation Area.</p> <ul style="list-style-type: none"> EBC plan showing east-west access from existing cycle routes should be extended to strategic location, links with Sandiacre and Nutbrook Trail with the consideration of east to west infrastructure connectivity. 	
August 2016	Site Allocations Potential Additional Sites Consultation	<p>Chetwynd: Support Allocation – Located in very sustainable location within the urban area between Toton and Chilwell in a well-established large surrounding residential area.</p> <p>Well located to take advantage of the recently opened NET extension and proposed HS2 station both of which area a short distance away.</p> <p>Development of the site is unlikely to have any significant implications for housing delivery in nearby Erewash Borough Council and Long Eaton particularly.</p> <p>Erewash Borough Council has no housing allocations in Long Eaton and has only one allocation in Stanton.</p> <p>Distance between Chetwynd and Stanton is unlikely to raise any significant delivery or viability concerns for Stanton.</p>	<p>Broxtowe Borough Council welcomes the support from Derbyshire County Council for the allocation of Chetwynd Barracks and has carried this through as a housing allocation in the Part 2 Local Plan Policy 3.1.</p>
February 2017	Brinsley Alternative Site Consultation	No representations made.	
September 2017	Publication	No objections but strong reference to the need to plan transport infrastructure in a comprehensive and coordinated way regarding the Chetwynd and Toton allocation (3.1. and	These issues are addressed in the proposed changes to the policies.

		3.2) with reference to the East Midlands Gateway model	
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The Environment Agency:

When they were consulted	What they were consulted on	What they Said	What has happened subsequently / What we did in response
November 2013	Site Allocations Issues and Options	35 - Land off Main Street Awsworth <ul style="list-style-type: none"> Former landfill site underlain by principal aquifer with potential for development to cause pollution. Environmental assessment required 	Site benefits from extant planning permission (implemented by access road). The site has been carried forward as a commitment in the Part 2 Local Plan and contributes towards the Aligned Core Strategy housing requirement for Awsworth.
		36 - The Ponderosa Awsworth <ul style="list-style-type: none"> Adjacent to former landfill site and underlain by principal aquifer site which has potential for development to cause pollution. Environmental assessment required. 	Development of the site is complete and contributes towards the Aligned Core Strategy housing requirement for Awsworth.
		190 – North of Barlows Cottages Awsworth <ul style="list-style-type: none"> Low flood risk area Ordinary watercourse within site. Watercourse must remain open and site specific flood risk assessment and flood mitigation measures required. 	Green Belt site which was considered further through the Green Belt Review.
		192 - West of Awsworth Lane South of Newtons Lane Cossall <ul style="list-style-type: none"> Former Common Farm landfill site underlain by principal aquifer with potential for development to cause pollution. Environmental assessment required. Site specific flood risk assessment focusing on sustainable surface water management required. Site specific flood risk assessment regarding 	Site no allocated for housing.

		infiltration of surface water need to be considered.	
		117 - Land at Newtons Lane Awsworth 394 – Rear of 13-27 The Glebe Cossall 138 - Walker Street Eastwood 146 – Chewton Street Newthorpe <ul style="list-style-type: none"> • No constraints. • Site specific flood risk assessment focusing on sustainable surface water management required. 	As comments for Nottinghamshire County Council staring on page 58 of this statement.
		564 - Land at Gin Close Way Awsworth <ul style="list-style-type: none"> • Historical flooding in vicinity • Surface water strategy required to reduce flooding to others. • Development would have potential to pollute groundwater • Environmental assessment required. 	Site benefits from extant planning permission. The site has been carried forward as a commitment in the Part 2 Local Plan and contributes towards the Aligned Core Strategy housing requirement for Awsworth.
		197 – North of Cordy Lane Brinsley <ul style="list-style-type: none"> • Site specific flood risk assessment focusing on sustainable surface water management and analysis of watercourse through site required. 	Green Belt site which was considered further through the Green Belt Review.
		200 - West of High Street Brinsley <ul style="list-style-type: none"> • No specific constraints • Surface water flooding to north of site requires investigation 	
		376 - Land opposite 28 Church Lane Brinsley <ul style="list-style-type: none"> • No specific constraints • Surface water flooding through middle of site requires investigation 	Green Belt site which was considered further through the Green Belt Review.
		3 – Wade Printers (and adjacent land) Baker Road	Site not allocated for housing.

		<ul style="list-style-type: none"> • Site specific flood risk assessment focusing on sustainable surface water management required. • Drain adjacent to East of site that will need site specific flood risk assessment. • Historic use of site potential for development to cause pollution to secondary aquifer environmental assessment required. 	
		<p>34 - Land off Acorn Avenue Giltbrook</p> <ul style="list-style-type: none"> • Historical flooding in vicinity • Surface water strategy required to reduce flooding to others. • Development has potential to pollute groundwater • Environmental assessment required. 	Part commitment and part to be protected for open space and flood mitigation on land to rear of Thorn Drive.
		<p>130 - Church Street Eastwood (Raleigh)</p> <ul style="list-style-type: none"> • Site specific flood risk assessment focusing on sustainable surface water management required. • Historic use underlain by secondary aquifer with potential for development to cause pollution. • Environmental assessment required. 	Same general response as in relation to comments in response to NCC for all remaining sites. Comments to be addressed through the development management process.
		<p>143 - South of Smithurst Road Giltbrook</p> <ul style="list-style-type: none"> • Site specific flood risk assessment focusing on sustainable surface water management required. • Flood mitigation assessment required for drain on Western boundary of site. 	Planning Permission granted and issues fully addresses.
		<p>203 – Nether Green East of Mansfield Road Eastwood</p> <ul style="list-style-type: none"> • South West and Western boundary within flood zone 3. • Sequential test and flood risk assessment (if 	Site not allocated for housing

		<p>sequentially preferable) required.</p> <ul style="list-style-type: none"> Flood risk management and biodiversity protection required for Brinsley Brook on Western part of site. 	
		<p>204 – North of 4 Mill Road Beauvale 206 – East of Baker Road/North of Nottingham Road Giltbrook 208 – West of Moorgreen 514 – Hall Farm Cockerhouse Road Eastwood</p> <ul style="list-style-type: none"> Site specific flood risk assessment focusing on sustainable surface water management required. 	Sites not allocated for housing
		<p>413 – Mansfield Road Nether Green</p> <ul style="list-style-type: none"> Ordinary watercourse to North and South of boundaries. Southern boundary within flood zone 3 suitable easement for flood risk management and biodiversity protection should be used. Site specific flood risk assessment focusing on sustainable surface water management required. Historic use as landfill site has potential for development to cause pollution to secondary aquifer, environmental assessment required. Site underlain by Made Ground and deterioration of water quality of adjacent brook suggests site causing pollution. 	Site not allocated for housing
		<p>496 – Greasley Beauvale D H Lawrence Primary School</p> <ul style="list-style-type: none"> No specific constraints Nearby watercourse (that EA have no knowledge of) requires investigation. 	Noted

		519 - Land off Thorn Drive & West of the Pastures Newthorpe 522 - Castle College Chewton Street Eastwood 105 - Land west of New Farm Lane Nuthall 113 - Land north of Alma Hill Kimberley 116 - Land north of Alma Hill Kimberley 131 - Church Hill Kimberley 234 - Land at New Farm Nuthall 271 - Gilt Hill Farm Kimberley 285 - Land north of Alma Hill west of Millfield Road Kimberley 586 – Kimberley Brewery <ul style="list-style-type: none"> • No specific constraints. • Site specific flood risk assessment focusing on sustainable surface water management required. 	Noted
		521 - Beamlight Automotive Newmanleys Road Eastwood <ul style="list-style-type: none"> • Site specific flood risk assessment focusing on sustainable surface water management required. • Historic use and adjacent landfill site potential for development to cause pollution to secondary aquifer. • Environmental assessment required. 	Issues addressed through the development management process.
		140 - Builders Yard Eastwood Road Kimberley <ul style="list-style-type: none"> • No specific constraints. • Site specific flood risk assessment focusing on sustainable surface water management required. Impacts on former landfill adjacent to Southern boundary should be investigated.	Noted
		144 - South of Eastwood Road Kimberley 215 - Land adjacent to Kimberley Depot Eastwood Road Kimberley	Noted

		<ul style="list-style-type: none"> • No specific constraints. • Site specific flood risk assessment focusing on sustainable surface water management required. • Impacts on former landfill adjacent to Southern boundary should be investigated. 	
	411 - 2 High Street Kimberley	<ul style="list-style-type: none"> • No specific constraints. • Site specific flood risk assessment focusing on sustainable surface water management required. • Small watercourse to South West boundary needs to be included in the flood risk assessment. 	Noted
	473 – Home Farm Nuthall	<ul style="list-style-type: none"> • Historic use of site could have potential for development to cause pollution to principal aquifer • Environmental assessment required. 	Noted
	136 - East of Main Street Awwsworth 128 – Robin Hood Inn, 17 Hall Lane Brinsley 125 - Land at Church Street Eastwood 129 - Telford Drive Eastwood 134 – Springbank Primary School Devonshire Drive Eastwood 147 - East of Pinfold Road Newthorpe 163 - Chewton Street Eastwood 201 – Rear of the Island Eastwood 313 - Brookhill Leys Farm Eastwood 349 - 66 Dovecote Road Eastwood 508 – Hilltop House Nottingham Road Eastwood 103 – Land east of New Farm Lane Nuthall 144 - South of Eastwood Road Kimberley		Noted

		<p>210 – South-east of 32 - 40 Maws Lane Kimberley</p> <p>218 - South of Kimberley Road Nuthall</p> <p>219 - West of the Paddocks Nuthall</p> <p>228 – North-west of Chestnut Drive Nuthall</p> <p>428 – Rear of Chilton Drive Watnall</p> <p>518 – Rear of 127 Kimberley Road Nuthall</p> <p>1 - 92-106 Broadgate Beeston</p> <p>28 - Hofton & Sons Regent Street Beeston</p> <p>261 - Brethren Meeting Hall Hillside Road Beeston</p> <p>265 – Beeston Police Station</p> <p>419 - Wadsworth Road Stapleford</p> <p>458 - Wyndham Court Field Lane Chilwell</p> <p>460 - Peatfield Court Peatfield Road Stapleford</p> <p>520 - Garages off Hall Drive Chilwell</p> <p>543 - Inham Nook Methodist Church Pearson Avenue Chilwell</p> <p>551 - Feathers Inn 5 Church Street Stapleford</p> <ul style="list-style-type: none"> • No specific constraints. 	
		<p>6 - N K Motors 205a Bye Pass Road Chilwell</p> <ul style="list-style-type: none"> • Located in flood zone 3 • Adjacent to unnamed watercourse. • Sequential test and flood risk assessment (if sequentially preferable) required. • Historic use of site could have potential for development to cause pollution to secondary aquifer, • environmental assessment required. 	Development management issues to be addressed in line with Policy 1 of this Local Plan as site not allocated in this Local Plan.
		<p>12 - Moults Yard 68-70 Nottingham Road Stapleford</p> <ul style="list-style-type: none"> • Historic use of site could have potential for development to cause pollution to principal aquifer 	As above

		<ul style="list-style-type: none"> Environmental assessment required. 	
		20 - Chetwynd Barracks Chetwynd Road Chilwell <ul style="list-style-type: none"> Site specific flood risk assessment focusing on sustainable surface water management required. Historic use of site potential for development to cause pollution to secondary aquifer Environmental assessment required. 	Matters addressed through the site allocation.
		51 - Pinfold Trading Estate Nottingham Road Stapleford <ul style="list-style-type: none"> Site specific flood risk assessment focusing on sustainable surface water management required. Historic use of site could have potential for development to cause pollution to principal aquifer, Environmental assessment required. 	Development management issues. Aldi have planning permission to build a new foodstore.
		95 - Allotments Hassocks Lane Beeston 107 - Land at Woodhouse Way Nuthall <ul style="list-style-type: none"> Comments on planning application remain valid. 	Noted
		108 - Field Farm north of Ilkeston Road Stapleford <ul style="list-style-type: none"> Majority of site within flood zone 1 Watercourse (Boundary Brook) dissects site meaning some within flood zone 3. Sequential approach confirmed, site specific flood risk assessment required. 	Core Strategy allocation
		111 – Land off Moss Drive Bramcote <ul style="list-style-type: none"> Site specific flood risk assessment focusing on sustainable surface water management and flood risk from Boundary Brook required. 	Site not allocated for housing
		135 - Field Lane Chilwell <ul style="list-style-type: none"> No specific constraints. 	Noted

		<ul style="list-style-type: none"> Site specific flood risk assessment focusing on sustainable surface water management required. 	
		150 – Beeston Maltings Dovecote Lane <ul style="list-style-type: none"> Historic use of site could have potential for development to cause pollution to secondary aquifer Environmental assessment required. 	Noted and development management issues to be assessed in line with Policy 1 of this Local Plan.
		104 – Land off Coventry Lane Bramcote 178 - Land north of Nottingham Road Trowell Moor 356 - East of Field Farm Sidings Lane Bramcote 410 - South of Baulk Lane Stapleford 412 – Chilwell Lane Bramcote (south of Common Lane) 415 - Ashlands Bilborough Road Trowell <ul style="list-style-type: none"> Site specific flood risk assessment focusing on sustainable surface water management required. 	Noted
		195 - Land adjacent to 428 Queens Road West Chilwell <ul style="list-style-type: none"> Located in flood zone 3. Sequential test and flood risk assessment (if sequentially preferable) required. Historic use of site could have potential for development to cause pollution to secondary aquifer Environmental assessment required. 	Issues addressed through a planning application.
		220 - Land east of Low Wood Road Nuthall <ul style="list-style-type: none"> Majority of site within flood zone 1 Watercourse dissects site meaning some within flood zone 3. Sequential approach and specific flood risk assessment required. 	Site not to be allocated for housing.
		230 - Lower Regent Street Beeston	Sites not allocated in this Local Plan. Urban sites and

		239 - Works Bailey Street Stapleford <ul style="list-style-type: none"> • Located in flood zone 3. • Sequential test and flood risk assessment (if sequentially preferable) required. 	Development management issues to be assessed in line with Policy 1 of this Local Plan
		231 - Wollaton Road Beeston <ul style="list-style-type: none"> • Historic use of site could have potential for development to cause pollution to principal aquifer • Environmental assessment required. 	Noted
		232 - Sandiacre Road Stapleford <ul style="list-style-type: none"> • Located in flood zone 3. • Sequential test and flood risk assessment (if sequentially preferable) required. • Historic use of site could have potential for development to cause pollution to principal aquifer • Environmental assessment required. 	Site not to be allocated for housing.
		237 – The Boots Company Beeston Site <ul style="list-style-type: none"> • Located in flood zone 3. • Sequential test and flood risk assessment (if sequentially preferable) required. • Historic use of site could have potential for development to cause pollution to secondary aquifer • Environmental assessment required. 	Matters fully addressed through Core Strategy and the planning application on this site.
		258 – Land at Lilac Grove Beeston <ul style="list-style-type: none"> • Located in flood zone 3. • Sequential test and flood risk assessment (if sequentially preferable) required. • Historic use of site could have potential for development to cause pollution to secondary aquifer 	Matters fully addressed through the Core Strategy re Sequential Test and other matters to be addressed as part of the development management process to be assessed in line with Policy 1 of this Local Plan.

		<ul style="list-style-type: none"> • Environmental assessment required. 	
		298 – Spring Farm Nottingham Road Trowell Moor <ul style="list-style-type: none"> • Within flood zone 1 • Site dissected by watercourse. • Site specific flood risk assessment and potentially mitigation proposals required. 	Site not to be allocated for housing.
		301 - 7a Middleton Crescent Beeston <ul style="list-style-type: none"> • Located in flood zone 3 and includes Tottle Brook. • Sequential test and flood risk assessment (if sequentially preferable) required. • Water Resource Act 1991 & Midlands Land Drainage Byelaws mean prior written consent from EA required which is not guaranteed. 	Urban site and development management issues process to be assessed in line with Policy 1 of this Local Plan.
		310 - Neville Sadler Court Beeston 389 - Neville Sadler Court Beeston <ul style="list-style-type: none"> • Located in flood zone 3. • Sequential test and flood risk assessment (if sequentially preferable) required. 	Urban sites and development management issues to be assessed in line with Policy 1 of this Local Plan.
		343 – St Johns College Peache Way Bramcote <ul style="list-style-type: none"> • No specific constraints. • Site specific flood risk assessment focusing on sustainable surface water management required. 	Planning Permission granted and development underway.
		360 - Chetwynd Barracks Chetwynd Road Chilwell <ul style="list-style-type: none"> • Site specific flood risk assessment focusing on sustainable surface water management required. • Historic use of site potential for development to cause pollution to secondary aquifer environmental assessment required. 	Comments have been fully taken on board with the site allocation.

		<p>398 - Manor Garage 365 Nottingham Road Toton</p> <ul style="list-style-type: none"> • Adjacent to River Erewash part of site is close to or is functional floodplain (flood zone 3b) and should not be developed. • Prior written consent from EA required which is not guaranteed. 	Following this response the site was moved out of the land supply and was deemed to be 'not deliverable or developable' in the Strategic Housing Land Availability Assessment.
		<p>407 – Land between A52 Stapleford and Chilwell Lane Bramcote</p> <ul style="list-style-type: none"> • Site specific flood risk assessment focusing on sustainable surface water management including analysis of ordinary watercourse required. 	Site not proposed to be allocated for housing.
		<p>408 - Myford Machine Tools Wilmot Lane Beeston</p> <ul style="list-style-type: none"> • Comments on planning application remain valid. 	Noted
		<p>420 - Land north of Stapleford Road Trowell</p> <ul style="list-style-type: none"> • Site specific flood risk assessment focusing on sustainable surface water management required. • Historic use of site potential for development to cause pollution to secondary aquifer environmental assessment required. 	Noted and development management issues
		<p>449 – Beeston Cement Depot Station Road Beeston</p> <p>499 - Beeston Business Park Technology Drive Beeston</p> <ul style="list-style-type: none"> • Located in flood zone 3. • Sequential test and flood risk assessment (if sequentially preferable) required. • Historic use of site could have potential for development to cause pollution to secondary aquifer, • Environmental assessment required. 	No sequentially preferable sites for either and no objections to the published version of the Local Plan. Beeston Business Park has planning permission.
		509 - Trowell Freight Depot Stapleford Road Trowell	Noted

		<ul style="list-style-type: none"> • Site specific flood risk assessment focusing on sustainable surface water management required. • Historic use of site could have potential for development to cause pollution to secondary aquifer • Environmental assessment required. 	
		548 - Beeston Van Hire 2 Barton Way Chilwell <ul style="list-style-type: none"> • Located in flood zone 2. • Sequential test and flood risk assessment (if sequentially preferable) required. 	Noted
		588 – Land to west of Bilborough Road Strelley 189 - Land at Smithfield Avenue Trowell 513 - Land belonging to Stubbing Wood Farm Watnall <ul style="list-style-type: none"> • Site specific flood risk assessment focusing on sustainable surface water management required. 	Sites not allocated
		Toton - (133, 254, 259, 403, 132, 407 & 358) <ul style="list-style-type: none"> • Site specific flood risk assessment focusing on sustainable surface water management required. Site 358 - (Toton Sidings) <ul style="list-style-type: none"> • Located within flood zones 1, 2 & 3. • Sequential test and flood risk assessment (if sequentially preferable) required. • Historic use of site could have potential for development to cause pollution to principal aquifer. • Environmental assessment required. Site 133 <ul style="list-style-type: none"> • Within flood zone 1 • Unmapped ordinary watercourse boarders site. • Planning proposals acceptable subject to flood 	Toton Strategic Location for growth, allocated for development with the full support of the EA. The site was originally confirmed as a Strategic Location for Growth through the Core Strategy process with all flood risk and other issues addressed in principle at that time.

		mitigation proposals.	
		Climate Change <ul style="list-style-type: none"> Focus is almost entirely on renewable technology and not enough consideration given to reducing flood risk. Sequential and exception tests not included in the DPD docs despite the CS saying this would be done. 	Policy 1 of the Local Plan addresses these points.
		Enhancing the Environment <ul style="list-style-type: none"> Integration of good quality green space is encouraged GI is encouraged Recreation opportunities should be managed to avoid areas of high biodiversity. 	Noted
		SA <ul style="list-style-type: none"> Section 3 Qu. 1-3 should promote opportunities for Green Infrastructure Consider the better management of water resources and waste. Recommend indicators for: increasing biodiversity levels “Will it provide a net biodiversity gain?” Recommend indicators for: managing flood risk “Will it avoid flood risk?” Recommend indicators for: minimising water usage “Will it minimise water usage?” Recommend indicators for: waste “will it reduce the number of fly-tipping incidents?” 	Noted
Autumn 2014	Green Belt Review Framework	No representations made.	
February 2015	Preferred Approach to site allocations:	No representations made.	

	Green Belt Review Consultation		
February 2015	Development Management Policies Issues and Options Consultation	<p>E27: Protection of groundwater</p> <p>The EA “would wish for it to be retained rather than merged into other policies. This approach is important for Broxtowe as the district is situated on principal and secondary aquifers”.</p>	<p>Broxtowe has incorporated the request to retain the 2004 LP policy E27 however; it has been incorporated into a merged policy in the Part 2 Local Plan Policy 19: Pollution, Hazardous Substances and Ground Conditions.</p> <p><i>“1. Permission will not be granted for development which would result in:...</i></p> <p><i>c) Development which would be liable to result in the infiltration of contaminants into groundwater resources, having regard to any cumulative effects of other developments and the degree of vulnerability of the resource, unless measures would be carried out as part of the development to prevent such contamination taking place”.</i></p>
		<p>E29: Contaminated land</p> <p>The EA “do not agree that there is no need for this policy. Former contaminative uses for example petrol stations or cemeteries pose a risk to groundwater and drinking water supply, but are not covered by environmental permitting regulations”. They “point out that issues around contaminated land is an environmental consideration and is not exclusive to human health matters”.</p>	<p>Broxtowe has incorporated the request to retain the 2004 LP policy E29 and has incorporated it into the Part 2 Local Plan Policy 19: Pollution, Hazardous Substances and Ground Conditions which states that;</p> <p><i>“2. Development of land potentially affected by contamination will not be permitted unless and until:</i></p> <p><i>a) A site investigation has been carried out to assess the nature and degree of contamination, using a method of investigation agreed in writing with the Council; and</i></p> <p><i>b) Details of effective and sustainable remedial</i></p>

			<p><i>measures required to deal with any contamination have been agreed in writing with the Council, taking into account actual or intended uses; and</i></p> <p><i>c) There will be no significant risk to the health and safety of the occupants of the development; and</i></p> <p><i>d) There will be no contamination of any surface water, water body, groundwater or adjacent land”.</i></p>
		<p>Possible new policy: Flood risk – sequential and exception tests</p> <p>The EA “have some serious concerns about the wording of the current draft and would not be able to support the draft policy in its current form”.</p> <p>“There is a need for clarification within the policy wording on which types of development would be subject to the principles of the Sequential and Exception Test elements of the policy.”</p> <p>Clarity should be added on the Exception test “to state that only the first part of the requirement for ‘wider sustainability benefits’ will be waived and the need to undertake a Flood Risk Assessment that demonstrates development will be safe and does not increase flood risk elsewhere, will continue to be complied with”.</p> <p>The EA “challenge the proposal to consider the term ‘minor development’ as less than 10 dwellings within the defended area”, as this is contrary to the PPG, and “small scale” [in the explanatory paragraph] needs to be defined.</p>	<p>Following this response Broxtowe Borough Council consulted with the Environment Agency to address the concerns that they had.</p>

		<p>The EA notes that “the tenor of the explanatory paragraph text is not replicated in the proposed policy wording”.</p> <p>The policy has “a number of phrases which are poorly defined and would be hard to understand and apply by all parties in the planning process”, including ‘where a risk of flooding or problems of surface water disposal exist’, ‘existing developed’, ‘adequately protected’, ‘suitable’ and ‘no adverse effects on the management of flood risk’.</p> <p>It is “important” that the “message is clear in the final policy wording” that the policy “relates only to a particular area that is defended to an appropriate standard”.</p> <p>Bullet A) “is simply application of the NPPF without any references to your justification of the variations proposed in the explanatory paragraph text and makes the flood risk policy aspirations unclear”.</p> <p>In bullet B), “further clarification is needed in regard to the term ‘compensation’ in the draft policy or whether the council’s intended requirement is for mitigation measures”. “Where an area benefits from an appropriate standard of flood protection (such as the river Trent defences) the Environment Agency does not normally seek flood compensation.”</p> <p>The “requirement for flood mitigation is and must be</p>	
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		<p>applicable to all sites (defended or not) and the requirement for flood ‘compensation’ is and must be for all sites that are not defended or have a sub standard level of flood defence”.</p> <p>If the draft policy “is intended to suggest that no mitigation...works are necessary for developments of less than 10 dwellings, it will be strongly opposed by the EA”; and “any policy where flood compensation is not an absolute requirement in non defended or sub standard defended areas is not acceptable to the EA and will be resisted”.</p> <p>In bullet C), the reference to ‘adverse effects’ “will need to be clearly defined”.</p> <p>In bullet D), the EA “would suggest that additional wording is included for ‘flood risk management assets’ to ensure that access is maintained at all times”.</p> <p>In bullet E), the EA “recommend that the policy needs to be more proactive in that it leads to an actual reduction in surface water run-off, rather than a simple no worsening principal”. The EA also “question how the policy will be made to apply to ‘off site measures’”.</p> <p>The EA “request that this draft policy is revised, and we would be happy to have further discussion around the detail of the proposed changes.”</p>	
		Possible new policy: Flood risk – Sustainable Drainage Systems	Policy 1 addresses this point.

		The EA “support the inclusion of the principle of the policy with details to follow once the necessary system is known and approved”.	
		Possible new policy: Green Infrastructure The policy should make specific reference to “blue infrastructure i.e. watercourse networks (including rivers, streams, canals, ditches and drains)” throughout the borough.	Broxtowe has incorporated the request into the Part 2 Local Plan Policy 28: Green Infrastructure Assets . Whilst ‘blue infrastructure’ isn’t specifically referenced using those terms the Justification text 28.1 for this policy says that; <i>Green Infrastructure is defined for the purposes of the Green Infrastructure Strategy (GIS) and the Part 2 Local Plan as “a network of living multi-functional natural features, green spaces, rivers, canals and lakes that link and connect villages, towns and cities”</i>
		SA scoping report Three specified documents are recommended to be added to the schedule of relevant plans, policies and programmes. The SFRA “could be considered to be out of date” and the EA “recommend that the document is reviewed and updated”.	
November 2015	Strategic Location for Growth at Toton Consultation	No representations made.	
August 2016	Site Allocations Potential Additional Sites Consultation	No representations made.	
February 2017	Brinsley Alternative Site Consultation	No preference on which site is developed – no difference in terms of environmental constraints.	Noted

		As set out in the SA secondary aquifer is present below the entire settlement and mitigation measures may be required. Environment Agency comfortable that any potential issues can be addressed by way of future discussions.	
September 2017	Publication	No fundamental objections. Some commentary on suggested policy wording changes to Policy 1	Suggestions have been incorporated into proposed changes at submission.

Historic England (formerly English Heritage)

When they were consulted	What they were consulted on	What they Said	What has happened subsequently / What we did in response
November 2013	Site Allocations Issues and Options Consultation	128 – Robin Hood Inn, 17 Hall Lane Brinsley <ul style="list-style-type: none"> Site adjacent to conservation area – character and significance of this need to be considered. 	Site not to be allocated
		198 – East of Church Lane Brinsley <ul style="list-style-type: none"> Impact of development on setting of Grade II Listed church needs to be considered – not referenced in site assessments 	Addressed in allocation with no objection for Historic England
		3 – Wade Printers (and adjacent land) Baker Road <ul style="list-style-type: none"> Impact on wider setting of Greasley Castle Scheduled Monument needs to be considered. 	Site not to be allocated
		134 – Springbank Primary School Devonshire Drive Eastwood <ul style="list-style-type: none"> Impact on the conservation area and adjacent Grade II Listed Building need to be considered. Note conversion of existing school building. 	Matters considered through the development management process.
		204 – North of 4 Mill Road Beauvale Impact on setting of Grade II Listed D H Lawrence primary school (site 496) needs to be considered.	Site not to be allocated
		206 – East of Baker Road/North of Nottingham Road Giltbrook <ul style="list-style-type: none"> Impact on wider setting of Greasley Castle Scheduled Monument needs to be considered. 	Site not to be allocated
		413 – Mansfield Road Nether Green <ul style="list-style-type: none"> Setting of Grade II Listed Eastwood Hall will need 	Site not to be allocated

		to be considered.	
		496 – Greasley Beauvale D H Lawrence Primary School <ul style="list-style-type: none"> • Need to ensure that residential use is most suitable and viable use for this Grade II Listed Building and is sympathetic to designation reasons • Have we explored alternatives including employment use? • Lower residential density might be more appropriate given significance of asset. 	Matters considered through the development management process
		508 – Hilltop House Nottingham Road Eastwood <ul style="list-style-type: none"> • Consider impact of development on adjacent Grade II Listed memorial. 	Development management issues
		514 – Hall Farm Cockerhouse Road Eastwood <ul style="list-style-type: none"> • Site includes Grade II Listed Hall Farm buildings • 98 dwellings is likely to impact upon the setting of these buildings • Further consideration of these issues is required. 	Site not to be allocated
		144 - South of Eastwood Road Kimberley <ul style="list-style-type: none"> • Part of site falls within a Conservation Area and therefore impact upon this will need to be considered. 	Matters to be addressed through the development management process
		473 – Home Farm Nuthall <ul style="list-style-type: none"> • Site is within Conservation Area • Includes 3 Grade II Listed Buildings (plus curtilage buildings), impact on these need to be considered. 	Site not allocated and matters will be addressed through the development management process.
		586 – Kimberley Brewery <ul style="list-style-type: none"> • Grade II Listed Buildings (LB) on site. • Buildings form substantial and distinctive part of 	Issues addressed through the development management process.

		<p>Kimberley Conservation Area (CA) (considered to be 'at risk' on the 2013 register).</p> <ul style="list-style-type: none"> • Concern over the number of dwellings proposed and impact upon the significance of heritage assets and the woodland within the site which contributes to the character of the CA. • TPO, SSSI & SINCE have not been picked up in site constraints. • Number for allocation more than for hybrid scheme EH were consulted on and they felt that even the lower figure would constitute substantial harm to the LB's and CA. • Recognise need for development to regenerate buildings. • Have alternate uses for buildings been explored (i.e. employment uses)? • Concern over the level of development and the potential loss of important features of the existing buildings and CA. 	
		<p>104 – Land off Coventry Lane Bramcote</p> <ul style="list-style-type: none"> • Impact on setting of Grade II Listed Trowell Hall and bridges along Nottingham Canal needs to be considered. • Large scale development may have wider impacts on heritage assets (e.g. at Strelley and Wollaton). 	Site not allocated
		<p>150 – Beeston Maltings Dovecote Lane</p> <ul style="list-style-type: none"> • Buildings on site include non-designated heritage assets and therefore consideration should be 	The Maltings buildings were demolished several years ago. Conservation issues will be addressed through the development management process and there is no

		given to retain and convert them.	objection from HE to the allocation in the Local Plan for 56 homes.
		237 – The Boots Company Beeston Site <ul style="list-style-type: none"> Setting of Grade I Listed Buildings needs to be considered. 	An outline planning application (14/00515/OUT) has been received and is currently pending albeit this is only in relation to S106 issues which are expected to be resolved by 31 August 2018. Historic England have been consulted throughout and support the principle of the redevelopment of the site.
		258 – Land at Lilac Grove Beeston <ul style="list-style-type: none"> Setting of Grade I Listed Buildings needs to be considered. 	Noted.
		265 – Beeston Police Station <ul style="list-style-type: none"> Site includes Grade II Listed Buildings and is within the Conservation Area, impact on these needs to be considered. 	It has been through the development management process and development is nearing completion.
		298 – Spring Farm Nottingham Road Trowell Moor <ul style="list-style-type: none"> Impact on setting heritage assets in Strelley needs to be considered. 	Site not to be allocated
		343 – St Johns College Peache Way Bramcote <ul style="list-style-type: none"> Site is within Conservation Area and includes 3 Grade II Listed Buildings, impact on setting and significance needs to be considered. 	Development nearing completion on site and issues were fully considered through the development management process.
		407 – Land between A52 Stapleford and Chilwell Lane Bramcote <ul style="list-style-type: none"> Setting and significance of Bramcote Conservation Area needs to be considered. Not recognised in constraints. 	Site not to be allocated
		412 – Chilwell Lane Bramcote (south of Common Lane)	Site not to be allocated

		<ul style="list-style-type: none"> Setting of adjacent Conservation Area needs to be considered. 	
		449 – Beeston Cement Depot Station Road Beeston <ul style="list-style-type: none"> Impact on setting of Listed railway buildings needs be considered. 	Noted
		588 – Land to west of Bilborough Road Strelley <ul style="list-style-type: none"> Impact on setting of Broad Oak Farm scheduled monument and Conservation Area needs to be considered. Not recognised in constraints. 	Site not to be allocated
		Green Belt <ul style="list-style-type: none"> No comment on Green Belt issues other than those for specific sites. 	Noted
		Economic Issues/Job Creation <ul style="list-style-type: none"> No comment other than those for specific sites. 	Noted
		Climate Change <ul style="list-style-type: none"> Check EH's policy through various guidance documents. There is a need to differentiate between technical potential and deployable potential. 	Noted
		Town Centres <ul style="list-style-type: none"> See EH's guidance on retailing in settlements 	Policy has no objection from Historic England and various policies in the plan secure the appropriate protection and enhancement of the historic environment.
		Community Facilities <ul style="list-style-type: none"> No detailed comment to make at this time 	Noted
		Enhancing the Environment <ul style="list-style-type: none"> Focus is mainly on natural environment. Positive strategy for conservation and 	Comments have been incorporated in the submission version of the Local Plan.

		<p>enhancement needs to be set out including heritage at risk.</p> <ul style="list-style-type: none"> • Landscape and historical landscape character assessments need to be carried out for large-scale expansion options. • Recognition of non-designated heritage assets is important through the development of a local list. • Up-to-date evidence base should be used. Inc. annual update of heritage counts survey. • Concerns regarding documents relating to historic environment considerations are not referenced. • No historic environment objectives have been identified. • Implications of development on the historic environment has not been analysed and assessed. • Historic environment should have its own dedicated heading. • Nottinghamshire Historic Environments Record (HER) should be used to gain info. Regarding underground historic environment assets. 	
		<p>Healthy Living</p> <ul style="list-style-type: none"> • Recognition that the protection of cultural facilities may also benefit heritage assets including wildlife corridors etc. 	Noted
		<p>Transport</p> <ul style="list-style-type: none"> • No detailed comments at this time. 	Noted
		<p>SA</p> <ul style="list-style-type: none"> • No reference to historic environment 	All comments have been fully taken on board and rectified.

		<p>considerations therefore no objectives identified.</p> <ul style="list-style-type: none"> • No analysis or assessment of historic environment policies or programs. • 'Landscapes' have not been properly considered. • No further information or discussion of historic environment attributes. • Appears unfinished, unclear of indicator measurements. • Info regarding non-designated heritage assets not included. Further baseline data required inc. Grade II LB's on the 'at risk' register. • No detailed comments regarding historic environment attributes. This needs to inc. character of the area and setting, for both designated and non-designated heritage assets. • County, national and regional scale comparison information not filled in. • Scoping report appears unfinished. Unclear what measurements are. • SA objective 3 & 7 need to relate to 'social' theme 	
Autumn 2014	Green Belt Review Framework	<p>Assessment criteria in figure 1 should be amended to include "both designated and non-designated heritage assets" and to also include "Scheduled Monuments" in the list that follows.</p> <p>The significance of assets should also be considered as more than just a measure of distance from an asset and should relate to broad considerations and not simply</p>	<p>Broxtowe (and the other Councils) incorporated the request into the text of the framework and this methodology was then used when carrying out the Green Belt Review.</p>

		visual impacts. Local conservation and archaeological expertise should be sought when undertaking assessments.	
February 2015	Preferred Approach to site allocations: Green Belt Review Consultation	<p>Concerned at scale and location of proposed removal of the Green Belt at Brinsley.</p> <p>Green Belt protects setting of heritage assets including the Conservation Area, Grade II listed Church (which currently enjoys an open landscape setting to the west and east) and non-designated heritage assets relating to the colliery site (including links to D.H.Lawrence) and the footpath which forms the former railway line.</p> <p>Historically development has occurred to the west of the Church Lane - development to the East may be unsustainable.</p> <p>As the development need for the settlement is comparatively small – why have the particular boundaries been chosen?</p> <p>2003 Local Plan Inspector recognised value of the agricultural land and importance area fulfils in the Green Belt. Inspector considered more sustainable locations that could meet housing requirements.</p>	Following these comments Broxtowe commissioned an independent expert in Historic Environment to assess the impact of development on the designated and non-designated heritage assets through an Open Design Review. The in-house Conservation Officer also assessed the proposals against their significance.
		Agree with the results of the assessment for zone 6	
		<p>Bramcote/Stapleford:</p> <p>Assessment fails to take into consideration impacts upon</p>	Following these comments Broxtowe commissioned an independent expert in Historic Environment to assess the impact of development on the designated and non-

		<p>designated heritage assets such as Bramcote Conservation Area.</p> <p>Topography of area with the two hills – Stapleford Hill and Bramcote Hill, are significant landscape features.</p> <p>Sites have some historic landscape interest with woodland planting.</p> <p>Consider wider impacts relating to views from Wollaton Hall.</p> <p>Scoring is incorrect for historic settlements and countryside encroachment (particularly from up the hills which has remained unaffected by development).</p>	<p>designated heritage assets through an Open Design Review. The in-house Conservation Officer also assessed the proposals against their significance</p>
February 2015	Development Management Policies Issues and Options Consultation	<p><u>E24: Trees, hedgerows and Tree Preservation Orders</u></p> <p>EH “consider that it would be helpful and NPPF compliant to retain a policy with regard to trees and hedgerows where they are important – for example where they play a positive contribution to the local character”. There is “scope for updating” to accord with the NPPF.</p>	<p>Broxtowe has incorporated the request into the Part 2 Local Plan Policy 31: Biodiversity Assets which states that;</p> <p><i>“Development proposals which are likely to lead to the increased use of any of the Biodiversity Assets listed below, as shown on the Policies Map, will be required to take reasonable opportunities to enhance the Asset(s). These Biodiversity Asset(s) are;...</i></p> <p><i>c) Trees which are the subject of Tree Preservation Orders; or</i></p> <p><i>d) Aged or veteran trees; or</i></p> <p><i>e) Ancient Woodland; or</i></p> <p><i>f) Hedgerows which are important according to the criteria of the Hedgerow Regulations 1997; or</i></p>

			g) Other trees and hedgerows which are important to the local environment”.
		<p><u>S8: Shopfront design</u> EH consider that “continuing policy reference to shopfront design, security and signage is important for the new Local Plan, as it will form part of your positive strategy for the historic environment”; “these three policies could easily be amalgamated”.</p>	<p>Broxtowe has incorporated the request into the Part 2 Local Plan Policy 18: shopfronts, signage and security measures which states that;</p> <p><i>“1. Proposals for shopfronts, signage and security measures will be granted permission/consent provided:</i> <i>a) That they relate well to the design of the building concerned;</i> <i>b) Are in keeping with the frontage as a whole; and</i> <i>c) Respect the character of the area.</i></p> <p><i>2. Security shutters should ensure that at least two thirds of their area comprises an open grille or large slots, in order to give a reasonable degree of visibility. Shutter boxes should be located discreetly within the frontage.”</i></p>
		<p><u>S9: Security measures</u> EH consider that “continuing policy reference to shopfront design, security and signage is important for the new Local Plan, as it will form part of your positive strategy for the historic environment”; “these three policies could easily be amalgamated”.</p>	
		<p><u>S10: Shopfront signage</u> EH consider that “continuing policy reference to shopfront design, security and signage is important for the new Local Plan, as it will form part of your positive strategy for the historic environment”; “these three policies could easily be amalgamated”.</p> <p>With regard to signage, “amenity is a very important consideration, particular[ly] in those historic areas (such as conservation areas) and as such a policy reference is needed, and should not simply be deferred to the NPPF”. The PPG “states that in relation to amenity, this includes the local characteristics of the neighbourhood, citing that if the locality where the advertisement is to be displayed has important scenic, historic, architectural or cultural</p>	

		<p>features consideration of whether it is in keeping with these features is required. A local plan policy on this would make this explicit for Broxtowe”.</p> <p><u>RC5: Protection of open spaces</u> “Open spaces can often form part of heritage assets – for example, non-designated historic parkland, cemeteries, important open spaces within Conservation Areas etc. Policy recognition should therefore include these matters and support the enhancement of such assets where relevant.”</p>	
		<p>Broxtowe has incorporated the request into the Part 2 Local Plan Policy 23: Proposals affecting designated and non-designated heritage assets which recognises setting as an important factor when considering development proposals including non-designated heritage assets.</p> <p><i>“1. Proposals will be supported where heritage assets and their settings are conserved or enhanced in line with their significance.</i></p> <p><i>2. Proposals that affect heritage assets will be required to demonstrate an understanding of the significance of the assets and their settings, identify the impact of the development upon them and provide a clear justification for the development in order that a decision can be made as to whether the merits of the proposals for the site bring public benefits which decisively outweigh the harm arising from the proposals.</i></p> <p><i>3. Proposals affecting a heritage asset and/or its setting will be considered against the following criteria, where relevant:</i></p> <p><i>a) The significance of the asset...</i></p> <p><i>d) Whether the proposals would respect the asset’s relationship with the historic street pattern, topography, urban spaces, landscape, views and landmarks”.</i></p>	

		<p><u>Possible new policy: Design</u> EH “consider that there is a need for a locally distinctive design policy”. “This could set out design criteria in more detail and should make reference to local character and distinctiveness.” There should also be reference to “local materials”.</p>	<p>Broxtowe has incorporated the request into the Part 2 Local Plan Policy 17: Design and Enhancing Local Identity which states that;</p> <p><i>“1. For all new development, permission will be granted for development which, where relevant:...</i> <i>d) Creates a place with a locally-inspired or otherwise distinctive character; “</i></p> <p>Policy 23: Proposals affecting designated and non-designated heritage assets also states;</p> <p><i>“3. Proposals affecting a heritage asset and/or its setting will be considered against the following criteria, where relevant;...</i> <i>c) Whether the proposals would preserve and enhance the character and appearance of the heritage asset by virtue of siting, scale, building form, massing, height, materials and quality of detail”.</i></p>
		<p><u>Possible new policy: Heritage assets / conservation</u> EH “consider that further detailed development management policies are essential”. “We consider that a lack of detailed development management policies relating to heritage would render the plan unsound.” They cite the ACS and NPPF in support of this view.</p> <p>The PPS guide [to which we referred in the consultation document] “is to be replaced”, however the forthcoming new documents “are not a replacement for detailed Local</p>	<p>Policy 23 addresses these points.</p>

		<p>Plan Policies and should not be used as such”.</p> <p>Broxtowe “may wish to set out further and more detailed local information requirements for applications involving heritage assets”.</p> <p>A “local list, or a methodology relating to the identification of non-designated heritage assets could be developed”. A link to EH guidance on local listing is provided.</p> <p>Some fairly general comments are made about possible topics and format for policies.</p> <p>Historic environment considerations “should not be limited to a stand-alone chapter”.</p> <p>EH “are happy to comment on draft policies as they develop and provide further advice on any of the above”.</p>	
		<p><u>Possible new policy: Archaeology</u></p> <p>EH “consider that reference is required within the Local Plan to this – this could be combined with a heritage asset policy, as above, or separated”.</p> <p>They “consider that there should be alignment with the City Council’s approach to archaeology”.</p>	<p>Broxtowe has incorporated the request into the Part 2 Local Plan Policy 23: Proposals affecting designated and non-designated heritage assets states that;</p> <p><i>“3. Proposals affecting a heritage asset and/or its setting will be considered against the following criteria, where relevant:...</i></p> <p><i>g) Whether the proposals would appropriately provide for ‘in-situ’ preservation, or investigation and recording, of archaeology”.</i></p>

			This is in line with Nottingham City Council approach (Policy He1:3g).
		<u>Possible new policy: Boots / Severn Trent</u> EH “consider that it is essential a policy to guide development for the strategic employment site at Boots is included within the Plan. A joint approach between your Authority and the City Council should also be pursued. As part of this, it is critical that reference is made within this to the protection of designated and non-designated assets to ensure the policy is sound”.	This may not be necessary as planning permission is ready to be granted subject to s106 issues with no objection from Historic England.
		<u>Possible new policy: Culture, tourism and sport</u> It is “important” to have a policy on this issue, as “part of your positive strategy for the conservation and enhancement of the historic environment...further detail should relate to literary heritage etc.”	Broxtowe has incorporated the request into the Part 2 Local Plan Policy 25: Culture, Tourism and Sport which states that; <i>"Development proposals will be encouraged that;</i> 1. <i>Make specific provision for sports pitches that are suitable for a wide age range of users, in particular children's sport.</i> 2. <i>Enhance the tourism offer in association with DH Lawrence or the industrial/pharmaceutical heritage of the Borough".</i>
		<u>Possible new policy: Cromford Canal</u> EH “would support the inclusion of such a policy”.	Broxtowe has incorporated the request into the Part 2 Local Plan justification text 28.4 and 28.5 for Policy 28: Green Infrastructure Assets. <i>"A potential continuation of the Nottingham Canal towpath north of Eastwood approximately follows the line of the former Cromford Canal. The Council will work with</i>

			<i>partners to look for ways to achieve this route. Protection of this route would help to retain a possible route for the restoration of the Cromford Canal, should proposals for this emerge in the future".</i>
		<p><u>SA scoping report:</u></p> <p>With regard to the inclusion of relevant plans, policies and programmes, "it does now cover the main documents". The objectives of these documents, and their implications for the plan, "have been adequately identified". The identification of key sustainability issues is now "adequate", as are the SA objectives.</p> <p>Overall: "Although some further amendment is still required, we consider if this is made, the document does fulfil the legislative requirements".</p> <p>However:</p> <ul style="list-style-type: none"> • "The baseline data still requires data inputting in relation to statistics for heritage assets within England." • "We are still very concerned that there is no discussion of the baseline data in chapter 4...there is no further discussion of the attributes for the area." • "We are still unclear as to what the proposed indicators are actually measuring as they just list types of heritage asset." <p>"There is no formal framework for assessment of site</p>	<p>Matters have been addressed.</p>

		allocations...further detail is needed to ensure a robust process...for example, for site allocations, a more detailed framework is needed to understand how these will be assessed and how these will be ranked (colour coding? +/- ?). For heritage assets, this will need an assessment of the significance of the heritage assets. Distance should not be used as a proxy to harm".	
November 2015	Strategic Location for Growth at Toton Consultation	No representations made.	
August 2016	Site Allocations Potential Additional Sites Consultation	Bramcote, Chetwynd and Nuthall: Not clear how heritage assets and their setting have been considered as part of the assessment of the sites and recommend that a site selection methodology in relation to historic assets is used to make the process sound.	The two sites to be allocated have followed full dialogue with historic England with no outstanding objections to their allocation.
February 2017	Brinsley Alternative Site Consultation	It is recommended that the Historic Environment Record be consulted to inform your consideration of the site. Advice from your Conservation Officer and Archeological experts should be sought in respect of the site, and the findings of the Historic Landscape Character Assessment be taken into account.	Broxtowe commissioned an independent expert in Historic Environment to assess the impact of development on the designated and non-designated heritage assets through an Open Design Review. The in-house Conservation Officer also assessed the proposals against their significance.
September 2017	Publication	No fundamental objections but request minor changes to policies 4.1, 5.1, 23 and 32.	All agreed and included in proposed changes to the submission version of the plan.

Natural England

When they were consulted	What they were consulted on	What they Said	What has happened subsequently / What we did in response
November 2013	Site Allocations	Housing / General Development	Noted

	Issues and Options Consultation	<p>Welcomes reference to Greater Nottingham Landscape Character Assessment, the 6Cs Growth Point Green Infrastructure Study and the Green Spaces Strategy 2009-2019.</p> <ul style="list-style-type: none"> • Suggest referencing emerging Broxtowe Green Infrastructure Study. • Soils and agricultural land should also be referenced. 	
		<p>237 – The Boots Company Beeston 258 – Land at Lilac Grove Beeston</p> <ul style="list-style-type: none"> • Protected species identified on site - appropriate surveys required. • Close proximity of number of wildlife sites including SSSI at Attenborough would need to be protected from adverse development impacts. • Proposed green infrastructure should protect and enhance these sites. 	<p>Aecom undertook an extended Phase I Habitat Survey which is summarised in the Ecology chapter (13) of the Environmental Report that was submitted to the Council with their planning application 14/00515/OUT for the Boots site (237). Aecom summarised that the implementation of the mitigation measures would avoid or minimise the potential effects to the majority of the ecological receptors, therefore the overall residual effect assessment is assessed as slight adverse. However they do recognise that cumulative effects of development with the adjacent Severn Trent land are likely and that further assessment of impact would be required once details of the development are known.</p>
		<p>Toton - (133, 254, 259, 403, 132, 407 & 358)</p> <ul style="list-style-type: none"> • Two local wildlife sites immediately adjacent to the railway line and two to the North West of the proposed site which should be protected and enhanced and linked by green infrastructure. 	<p>Substantial Green Infrastructure is expected to be delivered on the Strategic Location for Growth at Toton linking to existing surrounding Green Infrastructure.</p> <p>Part of the site west of Toton/Stapleford Lane</p>

		<ul style="list-style-type: none"> Development should not impact on SSSIs at Attenborough and Holme Pit to the South of the site. 	benefits from extant planning permission (12/00585/OUT) on which Natural England were consulted and raised no objection.
		Green Belt <ul style="list-style-type: none"> Opportunities should be taken to link Green Belt into green infrastructure and ecological networks. 	Policy 28 does this.
		Economic Issues/Job Creation <ul style="list-style-type: none"> Reference emerging Broxtowe Green Infrastructure Strategy to relay importance of Green Infrastructure in economic terms to the Borough. 	Noted
		Climate Change <ul style="list-style-type: none"> Designated landscapes and nature conservation area sites should be fully protected. Reference emerging Broxtowe Green Infrastructure Strategy to relay value of GI to help mitigate climate change. 	Noted
		Community Facilities <ul style="list-style-type: none"> Provision should be made of accessible semi-natural green space in and around urban area. Recommend the use of Natural England's Accessible Natural Greenspace Standards. Reference emerging Broxtowe Green Infrastructure Strategy as this includes protection and enhancement of open 	<p>Broxtowe has incorporated the request into the Part 2 Local Plan Policy 28: Green Infrastructure Assets which states that;</p> <p><i>“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</i></p>

		<p>space, Public Rights of Way and access issues.</p>	<p><i>Asset(s). These Green Infrastructure Assets are:...</i> <i>c) Informal Open Spaces i.e. ‘natural and semi-natural green space’ and ‘amenity green space’....[and]</i> <i>e) Recreational Routes”.</i></p> <p>Natural England’s Accessible Natural Green Space Standard has been used to develop a local standard (Broxtowe Green Space Standard) which itself has been incorporated into the justification text 28.6 states that :</p> <p><i>“The need for contributions for other types of green space will be assessed in accordance with the Broxtowe Green Space Standard ... which was developed taking account of Natural England’s Accessible Natural Greenspace Standards”.</i></p>
		<p>Enhancing the Environment</p> <ul style="list-style-type: none"> • Reference emerging Broxtowe Green Infrastructure Strategy to emphasise its provision of fundamental evidence to the plan. • Specific sites should be protected and enhanced: SSSIs (Attenborough Gravel Pits, Sellers Wood Meadows Nuthall, Kimberley Railway Cutting, Sledder Wood Meadows Greasley, Robinettes Cossall). • Local Nature Reserves and Local Wildlife Sites need to be protected. 	<p>Broxtowe has incorporated the request to reference the Green Infrastructure Strategy into the Part 2 Local Plan justification text 28.2 states that;</p> <p>All Sites of Special Scientific Interest (SSSIs) and Local Wildlife Sites are protected with an ambition to enhance them in the Part 2 Local Plan Policy 31: Biodiversity Assets which states that;</p> <p><i>“Development proposals which are likely to lead to the increased use of any of the Biodiversity Assets listed below, as shown on the Policies Map, will be</i></p>

		<ul style="list-style-type: none"> Greenwood Community Forest should be included. 	<p><i>required to take reasonable opportunities to enhance the Asset(s). These Biodiversity Asset(s) are;...</i></p> <p><i>a) Sites of Special Scientific Interest, Local Wildlife Sites or Local Geological Sites”</i></p> <p>All Nature Reserves (irrespective of management/designation) are protected in the Part 2 Local Plan through Policy 28: Green Infrastructure Assets which states that;</p> <p><i>“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:...</i></p> <p><i>f) Nature Reserves”.</i></p> <p>The Greenwood Community Forest has not been carried forward as a specific policy into the Part 2 Local Plan. However, the partnership undertook a study the ‘Greenwood Community Forest Green Infrastructure and Public Benefit Mapping’ which formed part of the evidence base for the Broxtowe Green Infrastructure Study which in turn is a fundamental part of evidence for delivering Green Infrastructure benefits throughout the Part 2 Local Plan.</p>
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		<p>Healthy Living</p> <ul style="list-style-type: none"> • Reference emerging Broxtowe Green Infrastructure Strategy to emphasise value of GI to promote healthy living and improve well-being. • GI needs to be considered at the outset to ensure it's fully integrated with existing green spaces. 	Noted
		<p>HRA</p> <ul style="list-style-type: none"> • Satisfied that Site Allocations will have no significant effect on European Site (alone or in combination) • No further assessment required at this stage. 	Noted. However in line with the recent legal judgment further work on this issue is being undertaken and will be complete by September 2018.
		<p>SA</p> <ul style="list-style-type: none"> • SA scoping carried out comprehensively and follows acceptable methodologies. • National Character Areas should be included i.e. Sherwood, Southern Magnesian Limestone and Nottinghamshire, Derbyshire & Yorkshire Coalfield. • Reference should be made to 6Cs Infrastructure Study. • Reference Greater Nottingham Landscape Character Assessment, soils and agricultural land. • Accessibility to open spaces to health and 	Noted

		well-being inc. social and community issues.	
Autumn 2014	Green Belt Review Framework	<p>Approach taken is appropriate to the aims and follows a logical methodology.</p> <p>Assessment should consider opportunities to link into GI & ecological networks. Landscape character could be considered when assessing value of the GB and reference should be made to the NCAs.</p>	The issues relating to GI, ecology and landscape are not Green Belt matters and therefore did not form part of the Green Belt Review however they were all taken into account in the Broxtowe's Part 2 Local Plan as part of the SA/ Green Infrastructure Strategy / Landscape and Visual Analysis Assessment.
February 2015	Preferred Approach to site allocations: Green Belt Review Consultation	<p>Zone 44: Contains two Sites of Special Scientific Interest (SSSI) – Bulwell Wood SSSI and Sellers Wood SSSI.</p> <p>Development should avoid any activity that would damage or destroy the interest features of these SSSIs, including trampling or erosion damage as a result of increased visitor pressure.</p>	Zone 44: Attenborough Wetlands SSSI whilst assessed through the Green Belt Review this site was not under consideration for development and has not been carried forwards in the Part 2 Local Plan.
February 2015	Development Management Policies Issues and Options Consultation	E16: Sites of Importance for Nature Conservation NE “generally agree with the analysis for this policy”, “particularly support the idea of including advice regarding the natural environment at the landscape scale, biodiversity networks and species protection” and “agree that it is important to link this policy with policy on green infrastructure”.	Noted
		<p>E24 Trees, hedgerows and Tree Preservation Orders</p> <p>NE “would wish to see a policy to protect ancient woodland and aged or veteran trees to comply with paragraph 118 of the NPPF”.</p>	<p>Broxtowe has incorporated the request into the Part 2 Local Plan Policy 31: Biodiversity Assets which states that;</p> <p><i>“Development proposals which are likely to lead to</i></p>

			<p><i>the increased use of any of the Biodiversity Assets listed below, as shown on the Policies Map, will be required to take reasonable opportunities to enhance the Asset(s). These Biodiversity Asset(s) are;...</i></p> <p><i>d) Aged or veteran trees; or</i></p> <p><i>e) Ancient Woodland;”.</i></p>
		<p>E33: Light pollution NE “support” a policy on light pollution. Reference should be made to “negative impact on local amenity, intrinsically dark landscapes and nature conservation (especially bats and invertebrates)” and to the use of “appropriate design” to address such impacts.</p>	<p>Broxtowe has incorporated the request into the Part 2 Local Plan Policy 19: Pollution, Hazardous Substances and Ground Conditions which states that;</p> <p><i>“1. Permission will not be granted for development which would result in:...</i></p> <p><i>b) 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</i></p> <p><i>nature conservation (especially bats and invertebrates)”.</i></p>
		<p>Possible new policy: Reducing CO2 emissions NE “suggest that a policy regarding renewable energy schemes should particularly include the avoidance of potential impacts on nature conservation and local landscapes” and “suggest that an assessment of landscape sensitivity is carried out before locations of schemes are</p>	<p>Broxtowe has incorporated the request into the Part 2 Local Plan Policy 30: Landscape which states that;</p> <p><i>“All developments within, or affecting the setting of, the local landscape character areas listed below should make a positive contribution to the quality</i></p>

		agreed”.	<i>and local distinctiveness of the landscape. They should therefore be consistent with the ‘landscape actions’ for the area concerned, as set out in the Greater Nottingham Landscape Character Assessment and in Appendix 7 of this Plan”.</i>
		Possible new policy: Design Policy should “include provision to encourage “Biodiversity by Design”” (a link to a relevant part of the TCPA’s website is provided). This should encourage “incorporating ecologically sensitive design and feature early on within a development scheme”; measures “can include green roofs, planting and landscaping using native species, setting up bird and bat boxes and sustainable urban drainage systems”.	Broxtowe has incorporated the request into the Part 2 Local Plan Policy 17: Place-making, design and amenity which states that; <i>“1. For all new development, permission will be granted for development which, where relevant:...</i> <i>n) Incorporates ecologically sensitive design, with a high standard of planting and features for biodiversity; and</i> <i>o) Uses native species of trees, shrubs and wild-flower seeds in landscaping proposals; and</i> <i>p) Integrates bat and/or bird boxes into the fabric of new buildings”.</i>
		Possible new policy: Landscape NE “supports the idea of a policy on landscape which uses information set out in the [Greater] Nottingham Landscape Character Assessment”. It also suggests that “reference should be made to the National Character Areas”, which are “a good decision making framework for the natural environment”.	Broxtowe has incorporated the request into the Part 2 Local Plan Policy 30: Landscape which states that; <i>“All developments within, or affecting the setting of, the local landscape character areas listed below should make a positive contribution to the quality and local distinctiveness of the landscape. They should therefore be consistent with the ‘landscape actions’ for the area concerned, as set out in the Greater</i>

			<i>Nottingham Landscape Character Assessment”.</i>
		Possible new policy: Green Infrastructure NE “agrees that any new policy will need to complement the Council’s emerging Green Infrastructure Strategy. It should integrate with other policies such as biodiversity, green space, flood risk and climate change adaptation”.	<p>Broxtowe has incorporated the request into the Part 2 Local Plan justification text 28.2 states that;</p> <p><i>“There is a need for these [Green Infrastructure] corridors to be enhanced in terms of quality, size, multi-functionality and connectivity, in order to maximise benefits and address needs identified in the GIS. 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”.</i></p>
		RC8: New informal open space NE “recommend the use of the Natural England’s Accessible Natural Greenspace Standards (ANGSt)”, which “provides a powerful tool in assessing current levels of accessible natural greenspace and planning for better provision”.	<p>Broxtowe has incorporated the request into the Part 2 Local Plan Policy 28: Green Infrastructure Assets which states that;</p> <p><i>“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:...</i></p> <p><i>c) Informal Open Spaces i.e. ‘natural and semi-natural green space’ and ‘amenity green space’”.</i></p> <p>Natural England’s Accessible Natural Green Space Standard has been used to develop a local standard (Broxtowe Green Space Standard) which itself has</p>

			<p>been incorporated into the justification text 28.6 states that :</p> <p><i>“The need for contributions for other types of green space will be assessed in accordance with the Broxtowe Green Space Standard ... which was developed taking account of Natural England’s Accessible Natural Greenspace Standards”.</i></p>
		<p>RC15: Long distance trails NE “agrees... that reference to the Council’s emerging Green Infrastructure Strategy should be made”.</p>	<p>Broxtowe has incorporated the request into the Part 2 Local Plan Policy 28: Green Infrastructure Assets which states that;</p> <p><i>“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;...</i></p> <p><i>e) Recreational Routes “</i></p> <p>The justification text 28.1 states that Green Infrastructure assets are defined and identified in the Green Infrastructure Strategy.</p>
		<p>SA Scoping Report NE “generally supports the scoping report but would like to have seen reference to the National Character Areas”.</p>	<p>The National Character Areas have been referenced in the Sustainability Appraisal ‘plans and programs’ sections.</p> <p>The National Character Areas were used as</p>

			background evidence for a Broxtowe specific Landscape and Visual Analysis Assessment which was undertaken by Aecom. The results of the assessment then fed back into the Sustainability Appraisal individual site allocation assessments.
November 2015	Strategic Location for Growth at Toton Consultation	No representations made.	
August 2016	Site Allocations Potential Additional Sites Consultation	Bramcote: Allocation unlikely to affect the notified features of any SSSI sites nearby. Welcome the opportunities identified for Green Infrastructure and wildlife corridors throughout the site.	Noted.
		Chetwynd Barracks: Sites lies within the Impact Risk Zone (IRZ) buffer for Attenborough Gravel Pits (SSSI) and would trigger consultation with Natural England in respect of any residential proposals in excess of 100 dwellings because of potential impact on the SSSI. Welcome significant opportunities for Green Infrastructure (GI) that the site offers and the ability to provide good links through the area up to the existing GI and local wildlife sites and provide local alternatives to Attenborough which is a honeypot site. Attenborough is notified for birds which are affected by water quality and water levels, any potential increase in visitor numbers would need to be given consideration.	Noted

		<p>Nuthall: Adjacent to Sellers Wood SSSI and within its Impact Risk Zone (IRZ) buffer. Site also lies within the IRZ buffer for Bulwell Wood. Both sites are notified for their woodland habitat. This sites allocation would directly affect Sellers Wood which is already used by the public and dog-walkers. The site is narrow and further dwellings adjacent to it would be a concern. The development site has capacity for development and Green Infrastructure (GI) and we would welcome moving the GI so that it is closest to the SSSI and positioning dwellings furthest away. We would welcome opportunities for more woodland as part of the green space opportunities to link between Sellers Wood and Bulwell Wood which would reduce woodland fragmentation and provide links between existing woodland habitats.</p>	<p>Broxtowe noted the concern regarding development adjacent to the woodland and incorporated a 'buffer' into the discussion points for the site specific workshop which was held on the 11th November 2016 (Natural England were invited but were unable to attend) .</p> <p>As a result it was considered that there were significant difficulties to deliver an acceptable, viable residential allocation which would be sensitive to the SSSI whilst achieving an acceptable access and the aspirations of the local community. It was therefore not carried forward as an allocation in the Part 2 Local Plan.</p>
February 2017	Brinsley Alternative Site Consultation	<p>Since Natural England duties relate to the protection and enhancement of the natural environment, Natural England's concerns relate primarily to safeguarding protected sites, species and landscapes and ensuring adequate green infrastructure provision. It follows that we have no particular comment to make except to advise that development sites should be located so as to avoid any adverse impacts on nationally and internationally designated nature conservation sites.</p>	<p>Noted.</p> <p>Broxtowe have considered all of the listed environmental designations (and more) through the Sustainability Appraisal which has fed into the site selection process.</p>

		<p>Natural England considers that there are a number of environmental designations and issues which may affect the size, scale, form and delivery of development sites and should be taken into account.</p> <p>Although the list below is not exhaustive, key environmental considerations include:</p> <ul style="list-style-type: none"> • International and national nature conservation sites, including Special Protection Areas (SPA), Special Areas of Conservation (SAC), Ramsar sites, SSSIs, National Nature Reserves; • Locally and regionally designated sites for geodiversity and biodiversity; • UK BAP habitats and significant proportions of BAP or protected species; • Ancient woodland; • Landscape character. 	
September 2017	Publication	No outstanding issues	

Highways England (formerly Highways Agency)

When they were consulted	What they were consulted on	What they Said	What has happened subsequently / What we did in response
November 2013	Site Allocations Issues and Options Consultation	No representations made.	
Autumn 2014	Green Belt Review Framework	Welcomes overall approach which will ensure a robust assessment of GB. Agency welcomes that the assessment will seek to check unrestricted sprawl of large built-up areas which aligns with the Agency's preference for development to be concentrated in existing built-up areas with good access to public transport.	Noted
February 2015	Preferred Approach to site allocations: Green Belt Review Consultation	No representations made.	
February 2015	Development Management Policies Issues and Options Consultation	No representations made.	
November 2015	Strategic Location for Growth at Toton Consultation	No representations made.	
August 2016	Site Allocations Potential Additional Sites Consultation	No representations made.	
February 2017	Brinsley Alternative Site Consultation	Given the relatively small scale of development being proposed, and the distance of the site from M1 junctions in the area, that the will be no significant impacts on the operations of the Strategic Road Network.	Noted
September 2017	Publication	No representations made.	

Homes and Community Agency

When they were consulted	What they were consulted on	What they Said	What has happened subsequently / What we did in response
November 2013	Site Allocations Issues and Options Consultation	No representations made.	
Autumn 2014	Green Belt Review Framework	Welcomes joint approach as ensures consistency & have no specific comments to make.	Noted
February 2015	Preferred Approach to site allocations: Green Belt Review Consultation	No representations made.	
February 2015	Development Management Policies Issues and Options Consultation	No representations made.	
November 2015	Strategic Location for Growth at Toton Consultation	No representations made.	
August 2016	Site Allocations Potential Additional Sites Consultation	No representations made.	
February 2017	Brinsley Alternative Site Consultation	No representations made.	
September 2017	Publication	No representations made.	

Clinical Commissioning Groups

When they were consulted	What they were consulted on	What they Said	What has happened subsequently / What we did in response
November 2013	Site Allocations Issues and Options Consultation	No representations made.	
Autumn 2014	Green Belt Review Framework	No representations made.	
February 2015	Preferred Approach to site allocations: Green Belt Review Consultation	No representations made.	
February 2015	Development Management Policies Issues and Options Consultation	No representations made.	
November 2015	Strategic Location for Growth at Toton Consultation	No representations made.	
August 2016	Site Allocations Potential Additional Sites Consultation	No representations made.	
February 2017	Brinsley Alternative Site Consultation	No representations made.	
September 2017	Publication	Representations made regarding request for either a new medical Centre of financial contributions to improve or extend existing facilities.	Financial contributions for health care provision was already included in the plan (policy 32), further detail will be determined at planning application stage. The requirement for new medical centers on specific sites has been built into the relevant site allocations.

No comments were received from other prescribed bodies and all were consulted at each stage of plan preparation.