



Gladman Developments Limited

Broxtowe Local Plan Part 2 Examination in Public

Hearing Statement in Respect of Matter 12: Development Management Policies

Issue: Are the relevant policies justified, effective and consistent with national policy.

Policy 17: Place Making, Design and Amenity

- 1) Is this policy justified and effective?
- 2) Is the requirement to score green on 9 out of 12 Building for Life 12 criteria appropriate and justified? Does it go further than the recommendations in this design guide?

1.1.1 Gladman do not consider the above policy to be justified or effective. Although Gladman recognise the importance of design, the policy requires all new qualifying **development to score 9 or more 'greens' against the guidance set in Buildings for Life 12**. This is considered to be an onerous requirement and goes beyond the requirements of the design guidance.

1.1.2 The use of Buildings for Life 12 should be voluntary at the discretion of the developer. Instead, flexibility should be built into the policy and the following wording is put forward for consideration:

**"Developers are encouraged to take account of the principles outlined in Building for Life 12 (or its successor) when considering the design of a development proposal."**

Policy 23: Designated and non-designated heritage assets

- 1) Having regard to Section 12 of the Framework, what is the justification for the impact of development on designated and non-designated assets to be assessed on the same basis?

1.1.3 In its current form the above policy is not considered to be consistent with the requirements of the Framework as it requires all development to be assessed on the same basis regardless of a heritage assets significance. Paragraph 132 – 134 of the Framework relate specifically to designated heritage assets and highlight that the more important the asset the greater the weight that should be attached to it. Paragraph 135 of the Framework relates specifically to non-designated heritage assets and the policy test that should be applied in these instances is that a balanced judgment should be reached having regard to the scale of any harm and the significance of the heritage asset. Accordingly, the two separate balancing tests should be referred to in the policy wording to ensure consistency with national policy.