

STONE PLANNING SERVICES LIMITED

Broxtowe Borough Council Part 2 Local Plan Examination Matter 12 Other Development Management Policies Submission on behalf of Beeston Fields Golf Club

SPS/0086

November 2018

Matter 12

Policy 27: Local Green Space

1. Is the basis for assessing, selecting and rejecting Local Green Space objective, consistent and justified with robust evidence?
2. Is the policy effective to manage development within a Local Green Space in line with paragraph 78 of the Framework?
3. Is the wording of the Policy 27 consistent with national policy in particular paragraph 74 of the Framework?

Our clients support the Council's decision to delete the Beeston Fields Golf Course from the list of Local Green Spaces as set out in Policy 27.

We do not consider that it satisfies the designation criteria as set out in paragraph 100 of the revised Framework for the reasons sets out in our earlier representations.

This policy is supported.

Policy 28 – Green Infrastructure Assets

1. Does the Plan provide appropriate protection to areas of locally valued landscape?
2. Are the character areas as defined supported by robust evidence? Are any amendments justified?

We have concerns regarding the structure of the policy as it could adversely impact on our client's ability to develop the golf course business. The proposed designation not only covers the active golf course but also areas of woodland, the club house, access drive and private land lying outside the golf course boundaries.

Introducing 'loss' into the second paragraph of the policy will be over restrictive. It could prevent even the most minor of development.

Plan 1 attached shows the extent of the actual active golf course edged in blue. It highlights built form areas - the club house, car park, walled garden which in our view should be excluded. Furthermore, Area A is a small paddock lying outside the golf course. It is unspectacular and should not form part of the Green Infrastructure Asset - Beeston Fields Golf Course; this should be removed from the designation on the Policies Map. Development proposals for these areas can be considered against other policies in the Plan.

We therefore suggest that

1. Policy 28 is amended to delete the word 'loss' in parameter 2.
2. The indenture Green Infrastructure Asset boundary is amended to that shown on Plan 1 attached.

Policy 31 - Biodiversity Assets

1. Having regard to MM33, is the policy effective, justified and consistent with national planning policy? Should part 2 of the policy refer to other impacts besides the increased use of Biodiversity Assets?

The Inspector will be aware from our 2017 representations that we objected to the justification for this designation and therefore commissioned Ramm Sanderson Ecology Limited to undertake a Grassland Assessment in that area. The Executive Summary states:

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

The findings of the surveys are summarised below:

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

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

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

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

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

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

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

Our preference is for the deletion of the designation in do far as it affects the Golf Course. Alternatively for the boundary of the "Biodiversity Asset" be revised as shown on the attached Plan 2.

Plan 1 – Suggested boundary for Green Infrastructure Asset (Policy 28)

Plan 2 – Suggested boundary for Bio Diversity Asset (Policy 31)