

BROXTOWE LOCAL PLAN**EXAMINATION IN PUBLIC****Response to Inspector's Matters, Issues and Questions
Made on Behalf of White Hills Park Federation Trust****MATTER 8 – Other Main Built Up Area Site Allocations****Preamble**

- 8.1 This Hearing Statement is made on behalf of White Hills Park Federation Trust ('our Client'), in advance of making verbal representations to the Examination in Public into the Broxtowe Local Plan.
- 8.2 Our Client has a land interest at east of Coventry Lane in Bramcote ('the Site') and is committed to delivering the Site.
- 8.3 Our response to the relevant questions in relation to Matter 8 are found below. We have had specific regard to the tests of soundness outlined in the National Planning Policy Framework ('the Framework'); namely that for the policies of the Local Plan to be sound, they need to be justified, effective, positively planned and consistent with national policy.
- 8.4 Our responses to each of the questions below relate to our Client's Site which is allocated under Policy 3.3, Bramcote (east of Coventry Lane).
- 8.5 A Statement of Common Ground (SoCG) has been entered into between our Client and Broxtowe Borough Council and should be read alongside this Hearing Statement.

1. Is there evidence that the development of each allocation is suitable, available, sustainable, viable and deliverable?

- 8.6 Our Client's Site is suitable, available, sustainable, viable and deliverable. This is evidenced by representations made on behalf of our Client and within the Sustainability Appraisal and Site Selection Document. This position is agreed through the SoCG, with the exception of viability which is discussed further below.

Suitable

- 8.7 The Sustainability Appraisal Report (July 2018) demonstrates that the Site is suitable for allocation. There are no technical reasons to preclude development from coming forward.

Available

- 8.8 There are no site ownership issues with the Site. Part of the Site is owned by Nottinghamshire County Council who have an agreement with the adjacent school and part is owned by Hillside Gospel Hall Trust. Both landowners are promoting the land for development.

Sustainable

- 8.9 The Sustainability Appraisal identifies that the Site is one of the most sustainable sites to be allocated when compared to reasonable alternatives.

Viable

- 8.10 The proposed increase in housing within the Main Modifications from 300 to 500 increases the viability of the Site. This is agreed with the Council as established through the SoCG. However, as currently drafted, the Policy potentially renders the Site unviable due to the requirement of providing a secondary school prior to any homes being built which is beyond the usual requirements of a housing site.

Deliverable

- 8.11 Our Client is committed to delivering the Site. It is available now and capable of delivering housing early in the Plan Period. We have made representations on behalf of our Client to each stage of the Local Plan Review and pre-application discussions have also been undertaken with the Council.
- 8.12 Whilst our Client is supportive of the allocation through Policy 3.3 and remains committed to delivering the Site, we have previously objected to the inclusion of the school within the allocation and the requirement for it to be delivered in conjunction with or prior to the housing development. Funding for the school redevelopment potentially requires the housing to come forward first so, furthermore a housebuilder would require a return on the land prior to contributions being made and potentially require the flexibility to make staged payments. On this basis, as currently written, Policy 3.3 could prejudice the delivery of both the housing and school.

2. What is the expected timescale and rate of development? Is this realistic?

- 8.13 The Site Selection Document sets out that the dwellings will be delivered between 2020 and 2025. Generic delivery assumptions from the SHLAA have been applied which are as follows:

- 2 developers building on-site;
- Maximum build-out of 110 market housing dwellings per year;
- Affordable housing can be delivered in addition to the market housing. Based on past average this would increase the build-out rate by 25 dwellings a year;
- Delivery would commence 3 years post grant of outline permission. This allows for delay in getting detailed permission approved (including legal agreements), discharging conditions and undertaking preliminary works to the site before building can commence.

8.14 We consider the expected timescale and rate of development to be realistic should the reference to the school be removed or amended within the Policy as suggested above.

3. Having regard to the respective Main Modifications, are the Key Development Requirements appropriate and justified? How significant are the Key Development Aspirations to achieve a sustainable development? Should they be Requirements for eg measures to mitigate highways impact?

8.15 In relation to Policy 3.3 Bramcote (east of Coventry Lane), our Client responds to the Key Development Requirements, as proposed through the Main Modifications (September 2018) as follows:

New Homes

8.16 The increase from 300 homes to 500 homes is appropriate and justified. A masterplan has been produced (Representation ID 6048) which demonstrates that the Site can incorporate access, open space, drainage and links to neighbouring land, together with an appropriate layout.

8.17 The provision of 500 homes on this Site would reduce the impact on the Green Belt by reducing the level of land required to be removed.

Connections and Highways

8.18 The requirements to slow the speed of traffic on Coventry Lane are not appropriate or justified. Coventry Lane is 1.1 miles long and much of the road is out of the control of our Client, who has control of just 0.1 miles of frontage. The requirement should therefore only require design measures to be incorporated along the frontage of the Site where suitably possible.

New Facilities

- 8.19 The Policy requirements under 'new facilities' are not appropriate or justified.
- 8.20 Our Client has been in discussions with the Council on delivering a replacement school as part of a planning application. However, previously the Site was considered a suitable housing site on its own merits without the school being delivered.
- 8.21 The school redevelopment and this Site are not mutually dependent upon one another and therefore should not be linked by association through the Development Requirements.

4. What are the site constraints, potential impacts or infrastructure requirements of the allocation and how would these be addressed?

- 8.22 The Site is one of the most sustainable sites to be allocated when compared to reasonable alternatives. It has been demonstrated that there are no unresolvable issues regarding infrastructure deliver and these are agreed within the SoCG.
- 8.23 The only Site constraint is part of the Site including land designated as 'Bramcote Moor Grassland Local Wildlife Site'. There is, however, potential to develop the Site whilst retaining the areas of greatest value. Any loss could be appropriately mitigated and compensated for elsewhere and it is not considered that this would reduce the number of units which could be delivered on the wider site. The Sustainability Appraisal therefore identifies that the impact would only be minor negative.

5. How have the Opun Design Reviews informed the respective policies?

- 8.24 We reserve our right to comment on this matter verbally.

6. Where a site is to be released from the Green Belt, have the exceptional circumstances for releasing the site from the Green Belt been demonstrated? Would the release of the site prejudice or conflict with the purposes of the Green Belt?

- 8.25 Exceptional circumstances for releasing the Site from the Green Belt have been demonstrated.
- 8.26 The adopted Local Plan identifies that insufficient land exists outside of the Green Belt to deliver the levels of homes required over the Plan Period. This together with the needs of the district and the benefits of new homes demonstrate the exceptional circumstances to release land from the Green Belt.

- 8.27 In the case of the Site, Bramcote is identified as being one of the best performing sites in the SA.
- 8.28 The release of the Site would not prejudice or conflict with the purposes of the Green Belt as demonstrated by the assessment of the Site against the five purposes, set out within Table 8.1 below.

Table 8.1 Assessment of the Site Against the Purposes of the Green Belt

Green Belt Purpose	Assessment
Purpose 1: To check the unrestricted sprawl of large built-up areas	<p>The Site does not perform well against this Green Belt purpose and as such presents a logical site for development due to the strong defensible boundaries on all sides.</p> <p>It has strong defensible boundaries on all four sides. Coventry Lane to the west, woodland and a railway line to the north, residential development to the east and Moor Farm Inn Lane to the south. Development of the Site would not cause any sprawl of the settlements.</p>
Purpose 2: To prevent neighbouring towns merging into one another	<p>The Site does not perform well against this Green Belt purpose.</p> <p>It lies to the west of the settlement. There is a strong buffer to the western boundary which would prevent any merging with another settlement. Moreover, the Site does not encroach on another settlement nor have a neighbouring settlement to do so.</p>
Purpose 3: To assist in safeguarding the countryside from encroachment	<p>The site was previously former playing fields associated with the adjacent school which has been unused as such for many years. As such the countryside will not be being encroached upon.</p>
Purpose 4: To preserve the setting and special character of historic towns	<p>The site is not within close proximity to a historic town that requires the preservation of the setting.</p>
Purpose 5: To assist in urban	<p>As previously mentioned, the site was previously former</p>

regeneration, by encouraging the recycling of derelict and other urban land	playing fields associated with the adjacent school which has been unused as such for many years and therefore despite it being greenfield, it assists in encouraging the recycling of derelict land.
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