

**Broxtowe Borough Council
Part 2 Local Plan 2018 - 2028**

HEARING STATEMENT

Matter 8: Other Main Built Up Area Site Allocations

**Policy 3.5: Severn Trent (Lilac Grove)
Policy 3.6: Beeston Maltings**

Matter 9: Other Site Allocations

**Policy 4.1: Land west of Awsworth
Policy 6.1: Walker Street, Eastwood
Policy 7.1: Land South of Kimberley, Inc. Kimberley Depot
Policy 7.2: Land South of Eastwood Road, Kimberley
Policy 7.3: Eastwood Road Builders Yard, Kimberley**

**Statement by Oxalis Planning
on behalf of clients**

November 2018

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CONTENTS

- 1. BACKGROUND**
- 2. QUESTIONS**
- 3. CONCLUSIONS**

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1.0 Background

1.1 Oxalis Planning Limited (Oxalis) acts on behalf of various clients within the Borough of Broxtowe. This includes Bloor Homes who has interest in land near to the HS2 Station at Toton and Westerman who has interests in land at Nuthall.

1.2 Oxalis represents clients on a complete range of sites from large scale strategic sites, to village extensions to small scale infill schemes throughout the East Midlands and nationwide. Oxalis is well placed to understand the complexity of delivering major housing schemes.

2.0 Questions

The following responses relate to the seven sites described below, unless otherwise stated:

- Policy 3.5 – Severn Trent (Lilac Grove)
- Policy 3.6 – Beeston Maltings
- Policy 4.1 – Land west of Awwsworth
- Policy 6.1 – Walker Street, Eastwood
- Policy 7.1 – Land south of Kimberley, including Kimberley Depot
- Policy 7.2 – Land south of Eastwood Road, Kimberley
- Policy 7.3 – Eastwood Road Builders Yard, Kimberley

- Q1. *Is there evidence that the development of each allocation is suitable, available, sustainable, viable and deliverable?*
- Q2. *What is the expected timescale and rate of development? Is this realistic?*
- Q3. *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 e.g. measures to mitigate highways impact?*
- Q4. *What are the site constraints, potential impacts or infrastructure requirements of the allocation and how would these be addressed?*

The 'built up area site allocations' and 'other site allocations' listed above, which are being proposed by the borough council, all have their problems. Many have been allocated since the 2004 Local Plan policies 3.6, 4.1, 6.1, 7.2 and 7.3) but have not come forward for a variety of reasons. Others are complex and will only come forward when other events occur such as the closure of a refuse tip (policy 7.1), or a school recreation facility (policy 6.1). These are discussed further below.

Policy 3.5 (Severn Trent (Lilac Grove))

This site, allocated for 100 homes in the emerging Part 2 Plan is identified in the 2004 Local Plan as site RC8c – Informal Open Space (Former Lilac Grove Tip). The site is likely to be heavily contaminated with expensive site remediation required before development can proceed. The site is not served by any adopted highway at present which means that access will either need to be taken through the Severn Trent Water land or through the adjacent development site. Either option is likely to be complicated. This is a challenging site and is unlikely to come forward quickly.

Policy 3.6 (Beeston Maltings)

This site is a 'left over' strip of land from the 2004 Local Plan Policy H1d allocation for residential development. The remainder has been built and is occupied. This strip is particularly difficult to bring forward. It is served by a narrow road and is previously developed, requiring investment to clear overgrown trees and vegetation and to remove a concrete base (and possible contamination) left over from former uses as a brewery and vehicle garage. It is unlikely to be an attractive site for development due to it abutting the railway line to its south east. The living environment is unlikely to be good quality (noisy and poor outlook) and the cost of developing the site is likely to be much higher than other sites. This will mean that development is unlikely to return generous profits and it is therefore unsurprising that the site remains vacant after such a lengthy period of time.

Policy 4.1 (Land west of Awsworth)

Although not directly relevant to Policy 4.1, the map 17 on page 59 of the Part 2 Local Plan shows a housing commitment to the north of Awsworth, accessed directly off the by-pass roundabout (Gin Close Way). This horse grazing site has been vacant for a considerable period of time. Planning permission was originally granted in 1977 (77/00337/OUT). A further permission was granted in 1987 for 71 homes (ref. 87/00562/FUL). More recent permissions in 2002 (ref. 02/00182/FUL) and 2015 15/00011/FUL) have varied the layout and configuration but still result in an unimplemented scheme for 71 units.

The Housing Trajectory (Table 5) envisages 105 homes being delivered from Awsworth SHLAA sites. This almost certainly includes the 71 dwellings approved on the Gin Close Way site that, despite having been granted permission 41 years ago, remains undeveloped. There is no realistic prospect of this site coming forward in the Plan period and the 71 houses should therefore be removed from the trajectory.

Policy 6.1 (Walker Street, Eastwood)

Part of this site has been allocated for residential developments since the 2004 Local Plan (policy H1h). It forms part of a larger Nottinghamshire County Council owned school and playing fields site but has never been brought forward. The proposed allocation incorporates the wider Lynncroft Primary and Nursery School, which is understood to have been recently demolished following the construction of the Lawrence View Primary and Nursery School of Walker Street. It is understood that the County Council may now have secured government funding (Land Release Fund) to allow the site to be prepared for development. While this is positive, the need for external funding suggests that site will be complex to bring forward and is likely to take longer than as anticipated in the Housing Trajectory.

Policy 7.1 (Land south of Kimberley including Kimberley Depot)

Most of this site is understood to be in the control of Broxtowe Borough Council with the remainder owned by Kimberley Caravans. The Council's portion is in use as a waste and recycling depot. It is unclear when the Council proposes to cease the use and/or relocate the facility elsewhere. Similarly, it is unclear whether Kimberley Caravans have plans to close or relocate. The site is likely to be costly to remediate and prepare for residential development. Much of the remainder of the site has extensive tree cover which will constrain development. This is a complex site to assemble and bring forward for development. It is not surprising that the Council are not envisaging any development until the final years of the Plan period. There is a high probability that many if not all of these homes will not be delivered during this Plan period.

Policy 7.2 (Land south of Eastwood Road, Kimberley)

This site incorporates 59 Eastwood Road and Speedwell Lane, wrapping around the rear of 27- 79 Eastwood Road. It was allocated in the 2004 Local Plan (site H1m) and abuts a belt of trees which forms the northern boundary of the Kimberley Depot site (policy 7.1). The trajectory indicates that these 40 homes are not due to come forward for at least three years, which will be nearly 20 years since the site was first allocated. These figures should not be relied upon for 5-year housing land supply purposes.

Policy 7.3 (Builders Yard, Eastwood Road, Kimberley)

This site has been allocated since the 2004 Local Plan. The site is in a heavily overgrown and unmaintained condition with remains of hard surfaced areas and disused buildings that will require clearance and remediation. The site has no active frontage with access to be taken between 44 and 46 Eastwood Road. It is likely that the site will be expensive to prepare for development and land values in this backland location are unlikely to be high. Despite being allocated for 14 years in the previous Local Plan, development is not expected to come forward for at least a further five years. There is a high probability that these 22 homes will not get delivered during the plan period.

As there are so many potential complications with delivering these sites, there is a strong possibility that the overall number of homes will not come forward as envisaged. In order to ensure that the plan is sound, 'reserve' sites should be allocated which will be permitted to come forward in the event that the Council falls behind on its housing trajectory.

Q5. *How have the Open Design Reviews informed the respective policies?*

No comments.

Q6. *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?*

No Comments.

3.0 **Conclusions**

- 3.1 The seven sites identified for development, referred to within Matters 8 and 9, are all complex and difficult to deliver. While some of these sites may come forward, it is highly improbable that all the sites will be delivered within the Plan period and even less likely that they will deliver the homes set out within the anticipated trajectory. Many of these sites remain vacant despite being allocated in the 2004 Local Plan. There is nothing in the Key Development Requirements or in the supporting text to each policy that explains why these sites will be delivered during this Plan when they were not delivered previously. For this reason, the plan is unsound because it will not deliver the number of homes required during the plan period.
- 3.2 In order to ensure a more robust supply of housing sites, additional land needs to be allocated. Sites at Toton (east of Toton Lane) and Nuthall, which are being promoted by Bloor Homes and W. Westerman are both available and can be brought forward quickly to boost housing supply.