

## **BROXTOWE PART 2 LOCAL PLAN EXAMINATION**

I would like to make the following written representation in addition to the completed forms sent to you by 3<sup>rd</sup> November 2017 of which I trust you have a copy.

I consider the plan has not been positively prepared, justified or consistent with national policy concerning site reference 411 land at rear of Ashfield, High St and 2 High St Kimberley NG16 2LS for the following reasons:

Site 411 was included in part 1 of Broxtowe's Core Strategy, and formally adopted at a full meeting of the council in Sept 2014 as being a site that could be suitable if green belt policy changed, and therefore considered for future development. During this time Broxtowe planning department actively encouraged us to put forward our bid for approx. 100 dwellings, including social housing.

The formal assessment concluded that moving the green belt boundary as the site's location passed all three of the criteria identified:

- Releasing a highly suitable medium scale site
- Meeting the direction of growth recommended
- Producing a defensible physical boundary.

In 2017 Broxtowe Borough Council changed the line of the green belt boundary approved in the core strategy above effectively excluding Site 411. The change now sets the green belt boundary in our view on the illogical line of a disused railway line, now a public footpath of approx. 250M from High Street to the A610, which is in-filled at the High Street end and developed with 2 Houses built around year 2000) This now forms the southern line of the green belt boundary having no logic other than to exclude our site from possible development. This path does not constitute a defensible physical boundary and cannot be justified, effective and consistent with the National Planning Policy Framework NPPF.

This decision was never communicated to us and it is only by chance that we discovered on the Broxtowe website the Opun design review panel for Kimberley paper (dated 10.10.16). The document sets out the rationale for the present proposal and states that the land east of the former railway line (which includes our plots) was considered less favourable as any development would be tucked behind existing houses and streets. We refute this assertion as there is considerable frontage at both Ashfield and 2 High St. to insert new access roads possible development proposals have included new road access on both properties, although one road could alternately service the whole site and many would consider the fact that the present street view of High St. would remain predominantly the same a benefit and certainly low impact.

The site overall is an obvious candidate for removal from the green belt, on the basis that it serves few of the purposes or opportunities associated with the green belt under the NPPF. Previous Broxtowe council appraisals have identified the land as grade 4 agricultural with no identified constraints for development and good highways and facilities served by Kimberley town centre less than 5

minutes walk away. The A610 is a very clear potential 'defensible boundary', which is a key consideration when reviewing green belt boundaries under Broxtowe's green belt assessment framework.

What happened between 2014 and 2017 I honestly do not know, it may be our land was retracted from consideration in the interests' of political expediency protecting development on council owned land, but it does seem unusual that a new and artificial boundary should be created when the guidance is clear about the need for robust and permanent edges to green belt (National Planning Policy Framework – Para 83 *"Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period."*

Our view is that the new proposed boundary would be evidently vulnerable to future changes (housing needs will continue to grow) and that the overall current housing need for Kimberley is not sufficient reason to avoid fixing a more permanent and robust green belt boundary as the A610.

We ask that the decision to change the removal of the site from green belt be reappraised purely on the basis of clear defensible boundaries and releasing a suitable, viable (builders have already stated an interest) and sustainable site for the future of Kimberley's development.

I would like to attend and speak at the hearing on Wednesday 12<sup>th</sup> December 10.00am to 12.00pm on Kimberley and 2.00pm to 4.00pm on green belt.