

Additional Representations on the Broxtowe Part Two Local Plan by Ken Mafham Associates on behalf of Stapleford Town Council

1. Introduction

Three general points inform the more specific representations made below.

☐ The Part Two Local Plan in effect rewrites key parts of the Core Strategy and that the strategic and sustainability implications of that rewrite are not properly dealt with.

☐ A neighbourhood Plan for Stapleford is at an advanced stage and will be formally submitted to Broxtowe BC. An update will be provided at the Hearing Session. The link is as follows

<https://staplefordtowncouncil.org.uk/community-information/stapleford-neighbourhood-plan>

☐ We have serious concerns about the greenbelt review methodology used and the way that the Sustainability Appraisal has been carried out in relation to the balancing of housing needs and greenbelt considerations.

☐

We are aware of Annex One of the new NPPF. We are assuming that the Examination is taking place against the background of the previous NPPF. We will refer to that document we will also refer to other announcements of public policy that were made in the period in which the Plan was prepared such as the Housing White Paper and the relevant NPPG as well as judgements in the Supreme Court and elsewhere.

MATTER 1 Legal Compliance and Duty to Cooperate.

Issue: Has the Plan been prepared in accordance with the legal and procedural requirements and has the duty to cooperate been met?

1a)

Duty to Cooperate

1.

In preparing the Plan, has the Council complied with the requirements of the Duty to Cooperate with prescribed bodies regarding cross boundary strategic matters?

2.

Does the Council's Duty to Cooperate Statement adequately demonstrate that the duty has been met?

1. The duty to co operate has not been met. On page three of Site Selection Document Main Report the Borough council summarise very well the approach that should be followed

"Key Principles from the ACS

The reason for working together to produce the ACS is a shared belief across the HMA that planning for the future of the area will be more consistent, and the administrative areas of the local authorities will not get in the way of good planning and service delivery (ACS paragraph 1.2.1). The fundamental and shared strategy across the HMA is one of urban concentration with regeneration which is considered to be the most appropriate strategy for the area. This is because it makes the most of existing infrastructure, and

because of the significant regeneration challenges faced by parts of the plan area, especially in the main built up area of Nottingham itself, where many of the brownfield development opportunities lie (ACS paragraph 3.2.2). In Broxtowe the majority of the housing provision is to be provided within or adjoining the main built up area of Nottingham which amounts to focussing most development in the urban south of Broxtowe. The reasons for this are explained in paragraph 3.2.22 of the ACS below 'Areas in the Urban south of Broxtowe benefit from being in the strongest housing sub market, having the most comprehensive public transport links particularly to Nottingham and being in the area of greatest affordable housing need.'" This strategy therefore performs best in terms of deliverability, sustainability, maximising opportunities for economic development, job creation and contributing to local housing needs.' There is a strong reference to the importance of neighbourhood plans in delivering this growth (ACS paragraph 3.2.25). In successfully resisting the High Court challenge to the plan by Calverton Parish Council Judge Jay set out a process which would be ideal to follow in paragraph 51 of his judgement which is to identify and then grapple with

- ☐ *The acuteness of the need (for new homes)*
- ☐ *Constraints on supply*
- ☐ *Difficulties in achieving sustainable development without Green Belt development*
- ☐ *Harm specific to the Green Belt*

• The extent to which the harm can be ameliorated This judgement was focussed on the interaction of Policies 2 and 3 of the ACS and the search sequence they required for sites as follows

- ☐ ***Within the main built up area of Nottingham***
- ☐ *Within key settlements for growth*
- ☐ *On the edge of the main built up area of Nottingham*
- ☐ *On the edge of key settlements for growth It is within this context that the site selection process in undertaken in this Part 2 Local plan “*

2. We know the High Court case well. It is true that Judge Jay found that the ACS had correctly carried out this process. It is also true however that a number of sites in the Local Plan including the land West of Coventry Lane and indeed East of Coventry Lane were not included in the ACS. Furthermore the “ sharing” of housing within Greater Nottingham is different. The Broxtowe Part Two Local Plan so far as large greenbelt sites in concerned is a very different animal to the ACS and we do not know how Judge Jay would see the Broxtowe Part Two Local Plan.

3. We return to these principle at a number of points in these submissions and in particular we set out our own views about meeting any unmet needs from Broxtowe elsewhere in the Greater Nottingham area. We that the submit that Borough Council has correctly identified the correct approach but has not followed it. We deal with the acuteness of need point and the specific harm to the greenbelt later under the Housing and Green Matters but under Matter One we make the following points

The reference to main urban area of Nottingham implies emboldened in the quotation above implies a cross boundary examination

4. The Duty to Co operate Statement sets out the kind of work that has been undertaken but we do not find any reference to a cross boundary to any study study that has taken place that identifies the green belt consequences that stem from the housing requirement and supply position in Broxtowe and other Boroughs and then goes on to examine the

scope there is in Nottingham City for increasing the land supply so as to avoid those consequences.

5. We note that cross boundary work on brownfield resources has only just started; this is far too late in the day to act as an input to the Broxtowe Local Plan. The requirement is not for LPAs to simply get together from time to time it is for co operation to take place that is be “**constructive, active and on going**”. The NPPG summarises this as follows

*“What activities are expected to be documented in a statement of common ground?
Strategic policy-making authorities are expected to document the activities undertaken when in the process of addressing strategic cross-boundary matters whilst cooperating. These will include (but are not limited to):*

- ☐ *working together at the outset of plan-making to identify cross-boundary matters which will need addressing;*
- ☐ *producing or commissioning joint research and evidence to address cross-boundary matters;*
- ☐ *assessing impacts of emerging policies; and*
- ☐ *preparing joint, or agreeing, strategic policies affecting more than one authority area to ensure development is coordinated, (**such as the distribution of unmet needs or policies relating to county matters**).*

These activities will need to be tailored to address local circumstances.

Paragraph: 007 Reference ID: 61-007-20180913”

6. A common sense interpretation of this requirement in the present context is that the cross boundary issues are correctly identified and required technical work is resourced and carried out to a time scale that will allow the result to inform emerging part two Local Plans.

7. There is no evidence that this happened and so the Borough Council has not met the Duty to co operate. A further consequence is that in submitting the the Local Plan it its current form the LPA has not taken into account all material considerations.

1b)

Other legal and procedural requirements

3.

In preparing the Plan has consultation been undertaken in accordance with the Council’s adopted Statement of Community Involvement and the consultation requirements in the Regulations

4.

Do the scope, content and timescale for the preparation of the Plan accord with the Council’s latest Local Development Scheme?

5.

Has the formulation of the Plan been based on a sound process of sustainability appraisal (SA)? In particular :

a)

How has the SA informed the preparation of the Plan at each stage and how were options selected/rejected

b)

Has the SA had sufficient regard to the implications of Minerals Safeguarding and Consultation

1. The Sustainability Appraisal of the Local Plan is a long and complex document and yet in our view the key areas for decision do not receive an adequate appraisal. Our main concern with the Local Plan is the consequences that the flawed approach to housing land supply has for the protection of greenbelt in Stapleford and adjacent areas. Para 136 of the 2012 PPF sets out the special test that is to be applied where changes to an established greenbelt are considered "Once established Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified. The Gvt White Paper "Fixing the Broken Housing Market" published in says at para 1.22

says "their identified housing requirement should be accommodated unless there are policies elsewhere in the National Planning Policy Framework that provide strong reasons for restricting development, or the adverse impacts of meeting this requirement would significantly and demonstrably outweigh the benefits

balancing exercise is required and the SA is a place where one might look for such evidence and justification and yet the summary table on page 76 of the SA does not even approach such an exercise. The assessment has the following major flaws

2. Two key planning criteria for any site appraisal let alone the appraisal of a site currently in the greenbelt; the effect on biodiversity and Green Infrastructure /Environment and landscape given equal footing with such criteria as innovation and crime.

3. Of the two environmental criteria that are included one, environment and landscape is shown white which can either mean the impact is not known; and this would be very odd indeed or it is known but is considered neutral/ not relevant or neutral. Nobody in their right mind could come to that conclusion about the site West of Coventry Lane.

4. So far as criterion 6 is concerned the loss of the greenbelt east of Coventry Lane is said to have minor negative consequences.

5. We note that the site is considered to have benefits for employment. We assume this refers to jobs in tree felling.

6. The SA seems to have been been written backwards from policies that had already been decided. At no point do we see any SA of the various options available so far as housing numbers are concerned and this should have been done. Government has a policy on housing land supply but it also has policies on the greenbelt and biodiversity and at the very least the costs on compliance should have been spelt out. A high cost would have given an extra impetus to the more proactive cross boundary co operation we have dealt with elsewhere. The SA carried out has no objective value or validity and therefore the legal duty has not been complied with.

7. The formulation of the Plan has not been based on a sound process of sustainability appraisal (SA)

Areas?

6.

Is the plan legally compliant with respect to Habitats Regulations

2

and any requirement for appropriate assessment?

No comments

7.

Has the preparation of the DMP complied with Part 2 of the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Plan) (England) Regulations 2012 in all other respects?

No comments

Matter 4 Housing Delivery, Trajectory and Land Supply

ISSUE: Whether the approach to the provision of housing is justified, positively prepared, effective, deliverable and consistent with the NPPF and the Aligned Core Strategy.

1. The proposed distribution of housing is not in accordance with the principle of sustainable development set out in the NPPF. The context for the Part Two Local Plan as it is seen by Broxtowe BC is set out in the Site Selection Document as follows

Table 3: Housing Figures

Settlement	Number of houses built 2011 - 2018	Number of houses on extant planning permissions and other deliverable urban sites	Number of houses on allocations made in this plan	Core Strategy Requirement	Total Supply	
Main Built up Area	677	2072	2080	Minimum 3,800	4829	
Awsworth	33	72	250	Up to 350	355	
Brinsley	14	29	110	Up to 150	153	
Eastwood	314	510	200	Up to 1,250	1024	
Kimberley	102	250	180	Up to 600	532	
Other Rural	4	53	0	No Requirement	57	
				6,150	6950	

2. The Site Selection Document July 2018 says the housing delivery anticipated during the whole plan period at Broxtowe is on page 79 of the Plan (in the trajectory) and this shows total housing completions between 2011 and 2028 of **7249** which includes a windfall allowance of 300 in total for the final 5 years of the plan which is consistent with the Core Strategy. The completion rate for 2011 to 2018 is only 163pa and a future completion rate of around 700 is being proposed. It is simply not realistic.

Whole plan = 7000. Completions to 2018 = 1144. Provision 2018 to 2028 5856 = 585pa

3. It is said that an increase of around 1000 or 15% on the CS figure is consistent with the Core Strategy. It is only consistent because the CS sets a minimum figure. In the same sense a figure of 10000 for Broxtowe would be consistent with the CS. What needs to be very closely examined is whether that increase is realistic and whether the balance of benefits and environmental costs is acceptable. The latter assessment is a full and comprehensive look at the options.

4. Whether it is legally in accord with the CS or not it is certainly true that the pattern of completion over Greater Nottingham will be far different under the proposals set out in the Part Two LP than they are in either the original Core Strategy proposals for Greater Nottingham (including Rushcliffe) or in the DCLG Local Needs Assessments as we show below

5. Broxtowe Completions in the adopted CS 360 pa

CS Total is 31000 Broxtowe Gedling Nottingham City plus 13000 Rushcliffe

Total = 43000 divided by 17 years = 2529 pa

Broxtowe total is 14%

If we use the DCLG Local Assessment figures the total goes down by 174 to 2355 and the Broxtowe % therefore goes up to 15%

So the original CS distribution for Greater Nottingham and the DCLG assessment figures give Broxtowe around 15% of the total.

6. The LP gives a completion rate of 585 per annum for 2018 to 2028 and if we compare that with the rate of 2355 for the Greater Nottingham in the DCLG assessment then the % for Broxtowe goes up to 25%

The duty to cooperate is in particular, the duty imposed on a person by subsection (1) requires the person—

(a) to engage constructively, actively and **on an ongoing basis** in any process by means of which activities within subsection (3) are undertaken,

so we need to look closely at whether alternative option for dealing with under performance in Broxtowe were looked at and assessed in terms of sustainability.

7. We find in para 4.1 of the activities that have taken place.

“JPAB is serviced by at least monthly meetings of the planning officers of the constituent Councils. Recent cooperation has focused on matters such as the implementation of Sustainable Urban Extensions, progressing the planning of the HS2 Hub Station at Toton, which is a mixed use allocation in this Local Plan, and working together on creating aligned and consistent Self Build Register for Greater Nottingham. Pilot Brownfield Registers for Broxtowe, Gedling, Nottingham and Rushcliffe have also been successfully jointly prepared”

There is no reference to a cross boundary solution to underperformance in Broxtowe.

9. It is of course relevant to look at how the other Districts have been performing because if they are caught in the land supply machine then they will be in no position to help.

We refer to LAPP-HOU-03 in the Examination Library for the Nottingham LP. City LP. And this says

“3.1 Between 2011 and 2017, 4,627 homes (net) were completed in Nottingham, leaving a requirement of 12,253 to 2028. This is marginally higher than the 4,470 new homes anticipated in the Core Strategy. See Table 2 below.

Table 2: Nottingham City Completions

(net) 2011/12 to 2016/17 Nottingham City	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	Total 2011/17	Ave p.a
Actual Completions	422	799	463	1,022	947	974	4,627	771
Core Strategy Anticipated Completions	475	475	880	880	880	880	4,470	745

10. The greenbelt sites that we are objecting to have a capacity of 240 dws 14 pa. Currently the completion rate in the City is running 26 pa ahead of expectations.”

11. In Gedling the Housing Background Paper LPD/BACK/01 says

“4.7 The total capacity of the urban area and land adjoining Hucknall is now considered to be 5,595, which is 250 dwellings more than was assumed through the Aligned Core Strategy. In addition, in response to the Inspectors recommendations, the Aligned Core Strategy distributes a total of 7,550 homes compared to a housing target of 7,250 to provide flexibility given uncertainty over larger sites¹². It is not considered that this uncertainty exists any more, as a planning application for the Gedling Colliery/Chase Farm site has been submitted, such that during the plan period there is no need to plan for substantial numbers of homes over and above the objectively assessed housing need of 7,250 homes.

*4.8 This means that the total ‘over supply’ which can be used to reduce the amount of housing at other locations is **550 homes**, comprised of 250 dwellings extra coming forward in the urban area and land adjoining Hucknall and 300 dwellings from the Inspector’s recommendation.*

4.9 This ‘over supply’ can be used to reduce the housing requirement at the key settlements for growth or the other villages. This approach is supported by the Inspector’s Report for the Aligned Core Strategy, which confirmed that whilst the overall housing number for the Borough is a minimum target¹³, the use of ‘up to’ figures indicates that limits will be imposed on the amounts of new housing in these locations¹⁴.

12. The Local Plan for Rushcliffe is based on the CS rate of 774 per annum and on that basis “13.The shortfall in completions between 2011-2017 is 291 dwellings, and this is included in whole as part of the 5 year land supply assessment. “1.

13. There is a big difference in Rushcliffe between the CS figure and the CS figure. The pa difference for five years is 850. More than three times the shortfall figure. It is arguable Rushcliffe has a surplus of capacity.

14. In conclusion there is every sign that a cross boundary study might identify a more

sustainable solution to any housing land shortage in Broxtowe than that set out in the Part Two Local Plan and the failure to look at that option means that the evidence base for the Local Plan is so seriously flawed as to make the plan unsound and not in accordance with the NPPG; either as revised or as previously published.

1. Does the Plan provide sufficient deliverable housing sites to meet the housing requirements of the borough to 2028? Does it accord with the spatial distribution set out in the ACS?
2. Does the Plan provide sufficient choice and flexibility of sites to meet current and future housing needs?
3. Should the housing sites denoted as Housing Commitments on the Policies Map form allocations in this Plan?
4. Is the Housing Trajectory realistic? Are the assumptions with regard to delivery and build out rates justified by the available evidence?
5. The Trajectory illustrates a shortfall of delivery in the early stages of the Plan period but a much higher annual delivery towards the latter stages. Is there a need for a flexible approach to maximise delivery in the early years of the Plan? Is a delivery of over 1000 dwellings per year in 2020/21 – 2023/24 realistic and achievable bearing in mind past delivery rates and the local housing market?
6. If allocated sites do not come forward as anticipated, in particular the sustainable urban extensions, does the Plan adequately set out potential contingency measures? Is sufficient consideration given to monitoring and triggers for review?
7. What is the current position with regard to five year housing land supply? Is the methodology for the calculation of the 5 year housing land supply appropriate? In particular should the buffer also be applied to the shortfall?
8. How have site densities been determined? Are they reasonably accurate?
9. How are windfall sites defined? Is the windfall allowance included in the supply trajectory appropriate having regard to the historic rate of windfall delivery in the borough? Should windfalls be included in the early years (i.e. the first 2 years) of the supply calculation?
10. Based on the available evidence is the lapse rate appropriate?

Matter 8 Other Main

Built Up Area Site Allocations

Policy 3.3 Bramcote (East of Coventry Lane)

Policy 3.4 Stapleford (West of Coventry Lane)

Policy 3.5 Severn Trent (Lilac Grove)

Policy 3.6 Beeston Maltings At no stage has the Stapleford Town Council formally objected to Policy 3.3 Bramcote (East of Coventry Lane) but this is simply because the Town Council feels that the right organisation to make such representations is the Bramcote Neighbourhood Forum. We have seen the submissions made on Policy 3.3 and fully support them. We have set out our

views on land West of Coventry Lane under Matter 9 but we are happy for the submissions to be discussed under Matter 8

Matter 11 Green Belt

ISSUE: Is the approach taken to review and protect the Green Belt justified, effective and consistent with national policy in the NPPF.

a) Site allocations in the Green Belt

1. Is the Green Belt review consistent with national policy in the NPPF and PPG's and with the sequential approach set down in Policy 2 of the ACS?

) Development in the Green Belt

1. The submissions below are based closely on Appendix One of the draft Neighbourhood Plan. The draft of the Neighbourhood Plan that was put out to consultation included the following appendix which was intended to set out in more detail the context for the Neighbourhood Plan. The Plan has been the subject of both informal and formal consultation. Consultation included a leaflet to every household and business in the NP Area. There was widespread support for the broad strategy of accepting housing commitments but with a emphasis in the future on greenbelt protection and an open space network. We had available the Govt White Paper Fixing the Broken Housing Market which gives a very clear summary of Govt policy. The following is highly relevant and we quote at length.

Green Belt land

1.37 Our Manifesto commits ours to be the first generation to leave the natural environment better than we found it – which we will take forward through our 25 Year Environment Plan. The Green Belt is highly valued by communities, particularly those on the edge of urban areas. The fundamental aim of Green Belt, since its introduction in the 1950s, has been to prevent urban sprawl by keeping land permanently open. It has been largely successful in this aim – the percentage of land covered by Green Belt has remained at around 13% since at least 1997.³³ However parts of it are not the green fields we often picture, and public access can be limited, depending on ownership and rights of way.

1.38 In the last Parliament, the Government increased Green Belt protection by abolishing the unpopular and counter-productive Regional Strategies that sought to delete areas of Green Belt. Our manifesto reiterated our commitment to protecting the Green Belt. The National Planning Policy Framework is already clear that Green Belt boundaries should be amended only “in exceptional circumstances” when plans are being prepared or revised, but does not define what those circumstances are. The Government wants to retain a high bar to ensure the Green Belt remains protected, but we also wish to be transparent about what this means in practice so that local communities can hold their councils to account.

1.39 Therefore we propose to amend and add to national policy to make clear that:

- authorities should amend Green Belt boundaries only when they can demonstrate that they have examined fully all other reasonable options for meeting their identified development requirements, including: making effective use of suitable brownfield sites and the opportunities offered by estate regeneration;*
- the potential offered by land which is currently underused, including surplus public sector land where appropriate;*
- optimising the proposed density of development; and*
- exploring whether other authorities can help to meet some of the identified development requirement.*

- and where land is removed from the Green Belt, local policies should require the impact to be offset by compensatory improvements to the environmental quality or accessibility of remaining Green Belt land. We will also explore whether higher contributions can be collected from development as a consequence of land being released from the Green Belt.*

This indication of a policy shift was available in Feb 2017 and should have been a material planning consideration for Broxtowe BC in preparing the Local Plan and yet there is no evidence that Broxtowe has moved on from the former regime where a land shortage was a signal for indiscriminate and arbitrary release of greenbelt sites for housing.

2. The main text of the Neighbourhood Plan sets out a Green Strategy which has been taken as the starting point for considering housing sites. As a consequence, there is a disagreement between the draft Neighbourhood Plan and the draft Part 2 Local Plan. In particular the Neighbourhood Plan as drafted does not support the allocation for housing of land West of Coventry Lane for housing. The greenbelt status of the site and its proposed designation as a local green space mean that an exceptionally strong justification would have to be provided to override the policy objections to non-greenbelt uses such as housing. The justification put forward in a report in January 2017 was that there is a shortfall in the provision of housing land. In our view the technical arguments put forward are incomplete on the grounds

- ☐ Consultation with other Districts of greater Nottingham on the whole is of Core Strategy targets, recent performance and the balance between requirement and supply and another look at the option of reviewing the Core Strategy so as to either change the size of the overall figure for greater Nottingham or revise the way it is distributed bearing in mind there was little explanation of how the distribution was arrived at in the Core Strategy process.

- ☐ Clarification of the five year supply and consideration by Broxtowe BC of commissioning a consultancy study of underperformance in house development.

- ☐ Detailed assessment of ways of speeding up the delivery of committed sites

- ☐ A review of past patterns of development and of the assumptions that can be justified on windfall sites

We argue under Matters One and Four that these steps have not been adequately undertaken.

3. If indeed there is a shortfall then any solution Broxtowe BC comes up with must be within the spatial framework set out in the Core Strategy.

4. In addition to these very broad strategic points there is the nature of the sites themselves. There are two main issues; the value of the greenbelt in this location and the sustainability or otherwise of the sites.

5. Site specific Greenbelt Issues

Since the January Report proposing a site to the West of Coventry Lane was prepared the Government has published a consultation Paper on Housing that puts great emphasis on the protection of the greenbelt. That report should have been considered at the July Committee which approved the submission version of the part 2 Local Plan for public consultation.

6. . Para 80 of the NPPF states that the five purposes of the greenbelt are

- ☐ to check the unrestricted sprawl of large built-up areas;

- ☐ to prevent neighbouring towns merging into one another;
- ☐ to assist in safeguarding the countryside from encroachment;
- ☐ to preserve the setting and special character of historic towns; and
- ☐ to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

7. . The green belt to the West of Coventry Lane included as a housing allocation in the Part Two Local Plan meets three of these objectives. It prevents the sprawl of the main built up area of Broxtowe to the North. It is part of a gap that separates Broxtowe from the built up area of Nottingham. It is also a very valuable part of the countryside used a great deal not only by residents of Stapleford but also from the wider area of Greater Nottingham. We note that the Broxtowe BC Committee that approved the inclusion of the site also resolved to include a new policy “ Policy 30, ‘Landscape’: Requires developments to be consistent with the guidelines of the Greater Nottingham Landscape Character Assessment “.

The housing site is not only functionally isolated from built up area but separated visually separated by the attractively landscaped open uses of the crematorium and the restored mineral working North of Bramcote Park.

8, Stapleford hill is a natural and permanent feature which should be the boundary of the greenbelt. Any development beyond this will be isolated because of this feature. We do not agree that the Coventry lane site should come out of the greenbelt because of this.

9, the area around Stapleford hill has great value to the local community and beyond. It is popular with mountain bikers and has the Robin hoods long distance footpath passing through. It also contains the iconic Hemlock stone. The Stapleford N.P looks to improve health and well-being of the community by integrating this site into a circular walk around Stapleford. We are also looking to capitalise on the historic features of Stapleford to help regenerate the town centre. This area of greenbelt is therefore important to maintain.

10, The Stapleford neighbourhood plan looks to further utilise the land north of Stapleford hill by extending woodland and grassland habitats to enhance the wildlife corridors to negate the negative effect of the fields farm development on the surrounding wildlife corridors. This area of greenbelt has significantly greater ecological value compared to arable farmland. It should therefore remain as greenbelt.. The quality of the landscape is shown in the photograph below



11, Transport infrastructure is permissible within the greenbelt. There is an opportunity in the future to place a train station on the existing train line on the Coventry lane site to improve transport links to Nottingham from Stapleford, Trowel, Bramcote and Wollaton. Greenbelt protection would keep this option open. The part two local plan is short sighted in not identifying this.

12, Churchyards and cemeteries count as green infrastructure. Bramcote crematorium is one of the busiest in the country and with a growing population its grounds may need to expand. Development which restricts this could be so keeping this vital facility within the greenbelt would give it protection.

13. Land to the West of Coventry Lane was not included in the ACS it was considered when Broxtowe published a report on additional sites in August 2016 and so was presumably not considered a sustainable option at that time. Land to the East of Coventry Lane was included and almost two thirds of the comments were not in favour.

14 .Sustainability Issues

The assessment for H123 by Broxtowe BC included in the Stapleford section of the Part Two Local Plan Issues and Options Report 2013 says

May be appropriate to consider it in conjunction with adjacent land (site 108 and 356) as the site in isolation is not well related to existing residential areas.

15 . For site 356 the Report says

The site is located within the Green Belt and is not physically attached to any settlement. It is therefore very unlikely to come forward as a housing site in isolation.

However, as part of a comprehensive development with land to the West the railway line to the North would form a logical and defensible Green Belt boundary. Technical issues are

under investigation

16 . The point we will make is that 108 and 356 together will not make a self-contained residential area it will simply constitute a large isolated housing area. The area would be totally dependent on services and amenities is aggravated by the fact that there is no public transport to the site and that pedestrian links along Coventry Lane to shops, schools and other amenities to the South are dangerous and unpleasant. The addition of land to the East of Coventry Lane with a capacity of 300 dwellings is unlikely to make a SUE and even if it did Coventry Lane, which is a dangerous road, would bisect the neighbourhood

17. The point in the Broxtowe assessment about the links to areas to the West, presumably Field Farm, so as to form a Sustainable Urban Extension is not only vague but is a policy that should have been debated as part of the Core Strategy. That document proposed a SUE of 450 dwellings at Field Farm. If what is now being considered is an agglomeration of sites with a total capacity of almost 1300 dwellings, then what is required is a review of the Core Strategy. This is particularly since it would open the door to proposals on SHLAA site H104 West of Coventry Lane and to the North of the railway. The argument will be made that 1300 dwellings does not have critical mass required of a true SUE. It is disturbing that in the Site Allocations Issues and Options document 2013 the following conclusion from the Tribal Study is quoted without qualification "H2 "North of Stapleford" (including Field Farm, "West of Coventry Lane" and "West of Bilborough Road") Suitable for development Capacity 3800 to 5700"

18 This possibility should have been assessed at the Core Strategy stage and has no place in the Part Two Local Plan

19. Overall the development of sites 108 and 356 for housing would be contrary to the purposes of the greenbelt, would not be self-contained and would be unsustainable for that and other reasons. The allocation of the sites would open the way to pressure for further development in the gap between Stapleford and Nottingham / Trowell and would be contrary to the strategic aims of the Nottinghamshire / Derbyshire greenbelt

20. Overall the development of sites 108 and 356 for housing would be contrary to the purposes of the greenbelt, would not be self contained and would be unsustainable for that and other reasons. The allocation of the sites would open the way to pressure for further development in the gap between Stapleford and Nottingham / Trowell and would be contrary to the strategic aims of the Nottinghamshire / Derbyshire greenbelt.

21 The draft Neighbourhood Plan has been the subject of an informal but thorough consultation exercise that included sending a copy of a leaflet summarising the Plan to every household in the town. It is an emerging Local Plan as is the Broxtowe Part 2 Local Plan. The Neighbourhood Plan as a whole and the Green Network and Designated Local Greenspace of land West of Coventry Lane in particular should be given due weight .

Ken Mafham Associates for Stapleford Town Council

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