Broxtowe Local Plan Part 2 (2018-2028)

Public Examination 04 December – 14 December 2018

Joint Hearing Statement Reference: Matters 4, 5, 9 & 11

By

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16 November 2018







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• Introduction

- This Hearing Statement addresses specific Matters, Issues and Questions (MIQs) raised by the Local Plan Inspector: Helen Hockenhull BA (Hons) B.PI MRTPI via Document Ref. INSP/03.
- Responses are provided only to MIQs embracing the following:
 - Matter 4: Housing Delivery, Trajectory and Land Supply;
 - Matter 5: Housing Size, Mix and Choice (Policy 15);
 - Matter 9: Other Site Allocations;
 - Matter 11: Green Belt.
- Locational references are made to "Brinsley", in the context of Policy 5.1: Land East of Church Lane, Brinsley and its identification as a Proposed Housing Allocation and (consequential) intended release from the Statutory Green Belt in the Broxtowe Local Plan Part 2, July 2018 (Ref. CD/04).
- Barratt David Wilson Homes has secured a legal interest in Land East of Church Lane, Brinsley and is promoting it for residential development through the remaining planning process 'jointly' with the Landowner (Mrs and Mrs Anthony) via the Appointed Agent, Guy Taylor Associates.

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.

4. Is the Housing Trajectory realistic? Are the assumptions with regard to delivery and build out rates justified by the available evidence?

ANSWER: NO; - The Housing Trajectory (Table 5) in the Submission Draft Local Plan Part 2, July 2018; (Ref. CD/04) in relation to "East of Church Lane, Brinsley" is **incorrect**. Most recent discussions with Broxtowe Borough Council confirm the existing entries for Financial Year (FY) 2020/2021 and Financial Year (FY) 2021/2022 are too high and should be amended to reflect a revised critical time path and anticipated build programme culminating in the following:

FY2020/2121: 45 Dwellings; FY2021/2022: 45 Dwellings; FY2022/2023: 20 Dwellings; TOTAL = 110 Dwellings.

The above revision is endorsed by Barratt David Wilson Homes who has secured a legal interest in the site and are promoting it through the remaining planning process 'jointly' with the Landowner (Mr and Mrs Anthony) via the Appointed Agent, Guy Taylor Associates.

The amended Housing Trajectory reflects a revised 'timeline' for the progression of a planning application, site acquisition, relevant legal (highway agreements), preliminary site works including new access/junction and commencement of development on site. A three year build and sales programme is anticipated to complete 110 dwellings. The revision is considered more "realistic" and is reconfirmed in the Statement of Common Ground (SoCG) dated 14 November 2018 between Broxtowe Borough Council, Guy Taylor Associates and Barratt David Wilson Homes.

Matter 5: Housing Size, Mix and Choice (Policy 15)

ISSUE: Whether the approach to the delivery of housing is justified, effective and consistent with national policy in the NPPF.

- i. Affordable housing
- 1. The ACS in Policy 8.5a sets down an affordable housing requirement of 30% for Broxtowe. What evidence is there to support the local variations proposed in Policy 15?

ANSWER: Policy 15 (Ref. PD/01) suggests a reduced commitment of 10% for the "Eastwood sub market" on the basis a weaker market viability is likely to be a

challenge. However, for the allocated sites the affordable provision is 30% with no particular justification for the higher rate within the same challenging "sub market".

2. Is it sufficiently clear what would form 'an exceptional circumstance' to justify off site provision of affordable housing referred to in part 5 of the policy?

ANSWER: NO; - Concern is expressed over the lack of clarity in Policy 15 of the Submission Draft Local Plan Part 2, July 2018 (Ref. CD/04) and Reasoned Justification (Paragraphs 15.1 - 15.2) in this regard.

3. In part 6 of the policy is it sufficiently clear whether the reference to 'house size' relates to number of bedrooms or to minimum floor areas set down in the Nationally Described Space Standards?

ANSWER: Concern is expressed it is not at all clear what is meant by 'house size'. Size could have any number of definitions including number of bedrooms, volume, massing, footprint, useable floorspace and height.

ii) Accessible and Adaptable dwellings

4. What local evidence is there to support the requirement for 10% of dwellings in development of 10 or more units to comply with M4 (2) of the Building Regulations? What would be the impact on viability?

ANSWER: Concern is expressed no evidence is forthcoming in this regard. It is simply presented in Policy 15 Part 7 as 'important' with no basis for the conclusion.

iii) Self-build/custom build

5. Is the requirement for 5% of dwellings in schemes over 20 units to form serviced plots for self-build or custom build justified by the evidence? What level of demand is indicated by the Council's Register? How has scheme viability been assessed?

ANSWER: No evidence is presented in this regard and it is likely to impact on the practicality of delivering larger sites. No guidance is in place as to the type, tenure or any other requirements. Furthermore, it is unclear as to the expectation on how these sites are to be integrated into larger scale developer schemes? How the plot is paid for? And what contributions are expected from the site purchaser/proposed developer towards elements such as infrastructure and affordable housing provision through S106 Planning Obligations?

- iv) Viability
- 6. Having regard to the requirement for affordable housing, accessible homes and selfbuild/custom build on larger schemes, what is the evidence that cumulatively such provision would maintain scheme viability? In particular in the weaker sub market areas of Eastwood and Stapleford, where a reduced affordable housing requirement is proposed, what evidence is there to demonstrate scheme viability would be maintained ? In a similar way to affordable housing, should a proposal for lesser provision of accessible homes and

self-build/custom build also be accompanied by a viability assessment?

ANSWER: This is the crux of the matter for the Brinsley Site Allocation which is identified as being located within the weaker "sub market" of Eastwood. However, the site is to be encumbered with 30% Affordable Housing, 10% Accessible Housing and 5% Self Build, leaving only 55% of the site as Market Housing. Yet, (unallocated) sites in the same "sub market" are able to benefit from a 20% reduction in the Affordable Housing Provision allowing 75% of sales to be Market Housing. There appears to be no justification for this disparity between adjacent sites within the same "sub market" (Paragraph 15.1 and Map 33, Submission Draft, Local Plan Part 2 (Ref. CD/04) which are only differentiated by the simple act of drawing a red line around the site within the Part 2 Plan, Submission Draft (Ref. CD/04).

By virtue of Maps 1, 19 and 20 Land East of Church Lane, Brinsley is within the built up area of the "Key Settlement" of Brinsley and, as such, lies within the "Eastwood Sub Market" as defined (Policy 15, Part 3 and Paragraph 15.1). It **should** benefit from this rather than being penalised.

Clearly, the viability of an allocated site in Brinsley will be more difficult than an unallocated site in Brinsley given the Policy as written.

Matter 9: Other Site Allocations

Policy 5.1: Land East of Church Lane, Brinsley

The following questions apply to Matters 8 & 9

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

ANSWER: YES; - Land East of Church Lane, Brinsley is **all** of the following:

- A **suitable** location for residential development on the Eastern side of the settlement. It is well contained immediately to the West and East by the Recreation Ground and the Brinsley Brook respectively. The latter point is recognised consistently in the attached Appendix – Site Selection Chronology. To the North and further to the West lie the existing built up area of Brinsley. Land directly to the South is designated as Statutory Green Belt;
- Immediately available for residential development with a 'willing vendor' (Mr & Mrs Anthony) who has now entered into a Legal Agreement with Barratt David Wilson Homes to promote the Land jointly through the remaining planning process and dispose of it upon receipt of Planning Permission;
- In a **sustainable** location which has been tested through the Local Plan Part 2 process. It scores well in the Assessment of Housing Sites (Site Selection Document, July 2018), Ref. CD/26 and in the following supporting Assessments and Appraisals:

- Landscape and Visual Analysis of Potential Development Sites Addendum, January 2017 (Ref. LA/03); Site Ref: LS47;
- Site Allocations Issues and Options (Brinsley), November 2013 (Ref. PD/06); Site Ref: 198;
- Preferred Approach to Site Allocations (Green Belt Review), February 2015; (PD/13)
 Zone 4: South East Brinsley);
- Broxtowe Borough Council Strategic Housing Land Availability Assessment (SHLAA) 2017/18 (Ref. HO/02); Site Ref: 198 (part);

NB The site's sustainability credentials are reflected in the attached Appendix – Site Selection Chronology.

• Commercially **viable** with sufficient background site investigations having been undertaken to confirm there are no financial 'show stoppers'. Competitive returns will be generated for both Landowner and Proposed Developer sufficient to warrant site progression, through disposal, investment and implementation, - mindful of Planning Policies, known constraints and infrastructure requirements, - all in the context of Paragraph 173 of the National Planning Policy Framework (NPPF), 2012.

And

• Developable and **deliverable** with no 'absolute bar/constraint' to site development and (scheme) implementation, in due course. Barratt David Wilson Homes is the largest volume house builder in the UK with a proven track record of 'delivery' in Broxtowe Borough utilising the Company's two Principal Brands: Barratt Homes and David Wilson Homes. We are confident of building and selling both Market and Affordable Housing at this particular location, thereby contributing towards meeting the Approved Housing Requirement in this part of the Borough, reflecting Policy 2: The Spatial Strategy in the Aligned Core Strategy, 2014 (Ref. PD/01);

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

ANSWER: - Progression of a Planning Application in parallel with the latter stages of Local Plan Part 2 'Adoption' is envisaged. Commencement of development is anticipated 6 months after the grant of Full Planning Permission and Site Acquisition allowing for discharge of Planning Conditions and Obligations and preliminary site works including new access/junction at the northern end of the site. Development is intended to progress during FY 2020/21 with an anticipated buildout of 110 dwellings over three years.

The above critical time path is considered "realistic" and is reconfirmed in the Statement of Common Ground (SOCG) dated 14 November 2018 between Broxtowe Borough Council, Guy Taylor Associates (Appointed Agent for 'The Landowner': Mr and Mrs Anthony) and Barratt David Wilson Homes (the Proposed Developer). An

amended Housing Trajectory is also included in the SOCG reflecting the anticipated timescale and delivery of dwellings between FY2020/21 and FY2022/23.

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 there be requirements for e.g. measures to mitigate highways impact?

ANSWER: NO; - Concern is expressed and clarification sought over some of the Proposed Main Modifications and Additional Modifications to the Publication Version of the Local Plan Part 2, September 2018 (Ref. BBC/02) under MM15 (in relation to Policy 5.1: East of Church Lane, Brinsley). Modifications surrounding:

• Conditions and Highways (provision of traffic calming measures on the A608);

And

• Green Infrastructure (ensuring area provided off site for SUDS is publically accessible amenity space);

are **not** appropriate and have not been justified.

Regarding the former (provision of traffic calming measures on the A608), this appears to be aimed at remedying an existing issue or concern on the local highway network in the vicinity of the site raised by "local residents" (in the absence of the proposed development). As such, this is contrary to Paragraphs 203 – 206 of the NPPF, 2012 in relation to Planning Conditions and Obligations and to corresponding sections on the 'Use of Planning Conditions' and 'Planning Obligations' in the accompanying Planning Practice Guidance. The Reasoned Justification associated with this Proposed Modification under MM15 is questioned.

This particular matter has not been raised by the Local Highway Authority previously. Nor does it recognise existing road markings and signage (including electronic) in close proximity to this Proposed Housing Allocation which fall under the jurisdiction of Nottinghamshire County Council, as custodian of the A608.

Regarding the latter (ensuring area provided off site for SUDS is publically accessible amenity space), the Proposed Modification fails to acknowledge the nature of the "intended SUDS" i.e. functioning Attenuation Facility/Balancing Pond to regulate surface water drainage from the proposed development, particularly in times of peak rainfall. Controlled discharge to the Brinsley Brook will then occur at a much lower rate to reflect current 'agricultural/green field' conditions. It is, in effect, an offsite engineering feature associated with the development itself rather than a 'public amenity'.

In seeking to make this feature "publically accessible", MM15 fails to appreciate the following:

- Potential conflict with existing farming/livestock operation directly to the South;

- No Public Right of Way across 'Private Land' currently;
- Restricted connectivity (offsite) i.e. beyond the Brinsley Brook (East) across Third Party land and Church Lane (West) on a West-East basis across agricultural land directly to the South;

It is unclear how concerns expressed over "visual impact" through "numerous representations" are addressed by "maximising public benefit" to/from the proposed Attenuation Facility/Balancing Pond, as noted in the Reasoned Justification to MM15. It is also unclear how this additional "Key Development Requirement" accords with Paragraphs 203 – 206 of the NPPF, 2012 and corresponding sections on the 'Use of Planning Conditions' and 'Planning Obligations' in the accompanying Planning Practice Guidance.

The two highlighted "Key Development Aspirations" above embracing "Connections and Highways" and "Green Infrastructure", as reflected in MM15, are **not** "significant" in achieving "sustainable development" at this particular location. Their inclusion/retention is questioned and Policy 5.1 is capable of delivering a satisfactory form of development with their deletion.

For completeness, confidence and certainty, Local Plan Policies should set out the requirements affecting Proposed Housing Land Allocations and measures to "mitigate" impacts. In this regard, addressing, for example, 'legitimate' highway impacts and/or 'specified' environmental concerns should be covered in Policies and their Supporting Paragraphs/Reasoned Justification. Unfortunately this is not the case in Policy 5.1: East of Church Lane, Brinsley with the insertion of the two "Key Development Aspirations" referenced above which have not been substantiated. They should be deleted accordingly.

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

ANSWER: - Site constraints associated with residential development on land East of Church Lane, Brinsley (Policy 5: Brinsley Site Allocation and Policy 5.1: East of Church Lane, Brinsley) and the potential impact have both been considered through the Local Plan Part 2 process and in a number of supporting Assessments and Appraisals, as itemised in the response to **Q1.** above under Matter 9.

Infrastructure requirements for the site, in the context of existing facilities and services (along with new ones) in Brinsley, have also been considered during the Local Plan Part 2 process, culminating in Policy 5.1, as amended by Main Modification MM15, together with two supporting documents, as follows:

Broxtowe Borough Council Part 2 Local Plan Infrastructure Delivery Plan July 2018 Ref. CD/19; Statement of Common Ground between Broxtowe Borough Council Guy Taylor Associates (717A) And Barratt David Wilson Homes (717B) 14 November 2018;

There is a further document which recognises "site constraints, potential impacts or infrastructure requirements of the allocation of land East of Church Lane, Brinsley for residential development" and how they can "be addressed". It is the following:

Guy Taylor Associates Supporting Statement Residential Development Saints Coppice Farm, Brinsley October 2017

which was submitted to the Borough Council in response to the Publication Draft Local Plan Part 2, September 2017 (Ref. CD/01) prior to the specified deadline: 17.00 on Friday 03 November 2017. It provides a comprehensive assessment of the site and its surroundings and sets out the policy background and the technical issues which need to be addressed in bringing forward residential development at this particular location. The Assessment concludes the site is deliverable.

Any constraints, potential impacts and infrastructure requirements associated with this particular site can all be addressed through the application of relevant Planning Policies in the Aligned Core Strategy, 2014 (Ref. PD/01) and the Local Plan Part 2, July 2018 Submission Draft (Ref. CD/04) in the grant of Planning Permission and attached Planning Conditions and associated S106 Planning Obligations.

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

ANSWER: - The Opun Design Review Panel Workshop undertaken for Land East of Church Lane, Brinsley on 03 October 2016 (Ref. OPUN/2) acknowledges its recommendations "do not preclude or prevent the allocation of the site". The Workshop identified key issues, agreed a set of design principles and outlined a schedule of follow-on work. The "key issues" are reproduced in the Statement of Common Ground (SoCG) dated 14 November 2018 between Broxtowe Borough Council, Guy Taylor Associates (Appointed Agent for 'The Landowner': Mr and Mrs Anthony) and Barratt David Wilson Homes (Proposed Developer) and have informed the content of Policy 5.1 in the submission Draft Local Plan Part 2 July 2018 (Ref. DC/04) and its "Key Development Requirements".

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?

ANSWER: YES; - First Part; NO – Second Part;

YES – First Part; : Exceptional circumstances for releasing land East of Church Lane, Brinsley for residential development (Policy 5.1) from the Statutory Green Belt have been demonstrated.

The approved scale of housing provision in the Aligned Core Strategy. 2014 (Ref. PD/01) for Broxtowe Borough i.e. a 'minimum' of 6,150 new homes (2011-2028) is confirmed via the approved 'Spatial Strategy' (Policy 2). Of this numerical requirement, "up to 150 homes" are directed to the "Key Settlement" of "Brinsley" under Policy 2, with development being directed "in or adjoining" it.

The need to review existing Green Belt boundaries, in order to deliver the approved quantum and distribution of new housing at Brinsley and other "Key Settlements" targeted for growth, is acknowledged in Policy 3: The Green Belt in the Aligned Core Strategy, 2014 (Ref. PD/01). In guiding "site selection", it confirms Green Belt land adjacent to the development boundaries of the built up area should be utilised.

Map 19 in the Submission Draft Local Plan Part 2, July 2018 (Ref. CD/04) highlights the "Key Settlement of Brinsley" and the extent "of the built up area". NB The extent of the (surrounding) Green Belt is indicated on the Submission Draft Local Plan Part 2 Policies Map (North).

Against the above commentary, it is clear proposed alterations to Statutory Green Belt boundaries around Brinsley are **necessary** to meet the approved housing requirement i.e. "up to 150 houses" (2011-2028). Insufficient 'brownfield' and 'non Green Belt' sites exist in/around the built up part of the settlement to meet this strategic policy imperative, established, and, indeed, framed in the Aligned Core Strategy, 2014 (Ref. PD/01).

NO – Second Part; : The proposed release of Land East of Church Lane, Brinsley from the Statutory Green Belt as indicated on Maps 19 and 20 in the Submission Draft Local Plan Part 2, July 2018 (Ref. CD/04), has been tested through the Local Plan Part 2 process and in the Housing Sites (Site Selection Document, July 2018), Ref. CD/26. Its impact, in Green Belt terms, has been assessed in the following documents:

- Site Allocations Issues and Options (Brinsley) November 2013 (Ref. PD/06); Site Ref: 198;
- Preferred Approach to Site Allocations (Green Belt Review), February 2015 (Ref. PD/13); Zone 4: South East Brinsley;

The above Assessments conclude the site would **not** "prejudice or conflict with the purposes of the Green Belt", as defined in Paragraph 80 of the NPPF, 2012. It is containable with defensible physical boundaries including Brinsley Brook along the Eastern (site) boundary. The site scored best (numerically) i.e. least impact on 'Green Belt Purpose/Impact' in the Brinsley "Zone Assessment Summary" with a score of "9" in the Green Belt Review, February 2015 (Ref. PD/13) confirming Land East of Church

Lane is less important to retain in the Statutory Green Belt than other sites/locations/zones around the settlement.

NB All these considerations are reflected in the Site Selection Chronology contained in Appendix A.

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?

ANSWER: YES; - The Broxtowe Green Belt Review is "consistent" with the NPPF and PPG in its approach towards the proposed release of Green Belt land in accommodating the approved Housing Requirement and promoting "sustainable patterns of development". Paragraphs 84 and 85 of the Framework, 2012 have been complied with, in this regard. The "sequential approach" prescribed in Policy 2: The Spatial Strategy in the Aligned Core Strategy, 2014 (Ref. PD/01) for accommodating new housing in Broxtowe Borough (including the "Key Settlement" of Brinsley) – "identified for growth" in the Local Plan period i.e. up to 2028 – has been followed.

The Broxtowe Green Belt Review has been undertaken in an appropriate manner and is considered both robust and sound culminating in proposed Green Belt releases/housing land allocations. Proposed revisions to current Green Belt boundaries are "consistent" with Paragraph 85 of the NPPF i.e. to "define boundaries clearly, using physical features that are readily recognisable and likely to be permanent".

Conclusion

- This Joint Submission has addressed the Matters, Issues and Questions (MIQs) raised by the Local Plan Inspector: Helen Hockenhull BA (Hons) B.PI MRTPI via Document Ref. INSP/03 and focused on Land East of Church Lane, Brinsley.
- Formal responses have been made to the following Matters:
 - Matter 4: Housing Delivery, Trajectory and Land Supply;
 - Matter 5: Housing Size, Mix and Choice (Policy 15);
 - Matter 9: Other Site Allocations;
 - Matter 11: Green Belt;

all in the context of:

- The Housing Trajectory for Brinsley (Ref. CD/04);
- Policy 5: Brinsley Site Allocation (Ref. CD/04);
- Policy 5.1: Land East of Church Lane, Brinsley: 110 houses (Ref. CD/04);
- Intended (consequential) release of Land East of Church Lane, Brinsley from the Statutory Green Belt under Policies 5 and 5.1 in the Submission Draft Broxtowe Local Plan Part 2 (Ref. CD/04).

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Appendix

• Land East of Church Lane, Brinsley – Site Selection Chronology

February 2010 - 'Greater Nottingham Sustainable Locations for Growth', (Ref. GB/02) Tribal Report. Land East of Brinsley considered the ideal direction for growth due to coalescence risk in all other directions.

June 2012 - 'Aligned Core Strategies' Broxtowe Borough, Gedling Borough and Nottingham City (Ref. PD/01) considered Land East of Church Lane as strategic direction for growth.

2013 - 'Strategic Housing Land Availability Assessment' (SHLAA). Identified a need for 159 dwellings on existing sites within the village of Brinsley.

March 2013 - 'Broxtowe Housing Land Availability Report'. Acknowledges Brinsley Brook to the East of the village may be a defensible Green Belt Boundary and only Land East of Church Lane meets all three assessment criteria.

November 2013 - 'Brinsley Site Allocations Issues and Options' (Ref. PD/06). Indicates Land East of Church Lane scores higher than any other and would be suitable for growth subject to changes to Green Belt Policy. All other directions contain coalescence issues.

Feb 2015 - 'Preferred Approach to Site Allocations Greenbelt Review' (Ref. PD/13) produced by Broxtowe Borough Council and Ashfield District Council. Confirmation Land East of Church Lane is best direction for growth. Joint work with Ashfield is material consideration under the Duty to Cooperate.

"The finding of this review confirms that the east of Church Lane site (zone 4) contains a significant defensible boundary in Brinsley Brook and the other sites do not. Taking the greenbelt review as a whole, the sites to the northeast (zone 3), west (zone 6) and south (zone 5) of the village are more important to retain in the greenbelt than the site to the east."

October 2016 - Site Specific Workshop. Key Stakeholders discussed how Land East of Church Lane would be developed and controlled. This was attended by members of Brinsley Parish Council who stated:

"If any part of the site were to be developed, the area behind the recreation ground is considered to be the 'least worst' place. With an adjacent area also to come out of the Green Belt to accommodate SuDs and open space." (Broxtowe Borough Council, Jobs and Economy Committee 26th January 2017, pg. 118) (Ref. COM/05)

October 2016 - 'Opun Design Review Panel' (Ref. OPUN/02). Further recommendations and refinements made to proposed allocation indicating area behind the Recreation Ground as being ideal location for housing.

November 2016 - 'Brinsley Parish Council' Extraordinary meeting with Steffan Saunders Head of Neighbourhood and Prosperity, Broxtowe Borough Council. Minute concludes:

"The Council held a discussion regarding the Church Lane site and felt the site was, in principle, the preferred site for up to 100 homes but was subject to consultation with residents. The boundaries for the site noted as secure to prevent further encroachment into the greenbelt". **February 2017** - 'Brinsley Alternative Site Consultation' (Ref. PD18). Direction for growth was again tested and Land East of Cordy Lane was again recommended based on same reasons of defensible boundary and least impact on the purposes of Greenbelt.

March 2017 - 'Infrastructure Workshop', No particular issues or constraints identified by attendees. Site was deemed appropriate. Benefits and enhancements were considered.

September 2017 - 'Part 2 Local Plan' Publication Version (Ref. CD/01) includes Policy 5 for Brinsley. Site preferred as Housing Allocation including justification for selection.

August 2018 - Part 2 Plan submitted to Secretary of State for Examination (Ref. CD/04). Reconfirmation of site selection as Housing Land Allocation and Green Belt release within Policy 5.