



## **Broxtowe Part 2 Local Plan**

### **Response to Council's Matter 3 (M3A5) Action Point**

#### **Hearing Statement on behalf of British Land Company (ID – 6053)**

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##### Background

WYG attended Hearing Matter 3 of the Broxtowe Part 2 Local Plan examination on the 4<sup>th</sup> December 2018 to discuss matters relating to retail.

During this session, officers were asked to provide the Inspector with additional evidence required to demonstrate that the requirements of para 016 of the 'Ensuring the Vitality of Town Centres' chapter of the National Planning Practice Guidance (NPPG) in respect of the setting of a locally appropriate threshold had been complied with. This requires authorities to consider the:

- Scale of proposals relative to town centres
- The existing viability and vitality of town centres
- Cumulative effects of recent developments
- Whether local town centres are vulnerable
- Likely effects of development on any town centre strategy
- Impact on any other planned investment

(underlining added)

On the 16<sup>th</sup> January WYG were sent a note relating to action point M325. The note provides no additional evidence whatsoever and merely points the Inspector towards Appendix 14 of the 2015 Retail Study, which is already in evidence before her and which was referred to and discussed at the 4<sup>th</sup> December hearing session. The Council's response, therefore, simply fails to action the Inspector's request and fails to move the debate forward at all.

Appendix 14 (specifically paragraphs 1.8, 1.9 and 1.10) of the 2015 Retail Study are referenced by Council. Nowhere in Appendix 14 is the proposed threshold clearly assessed against the six NPPG tests specifically, least of all specifically in respect of Broxtowe town centres and administrative area. Appendix 14 makes broad-brush generalisations about trends across the Greater Nottinghamshire authorities. It is also entirely inappropriate to assess the suitability of the threshold against experiences of other Council's across England (para 1.10) as the threshold ought to be based on local circumstance.

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Specifically, Appendix 14 and the 2015 Retail Study generally does not:

- Assess the scale of proposals relative to town centres. Information is provided on commitments in the Retail Study, but no relative judgements are made in respect of town centres, and certainly not in respect of Broxtowe town centres;
- Cumulative effects of recent developments. While health check information is provided and recent development identified, the effects of recent development are not set out.
- Whether local town centres are vulnerable. Indeed, indications are that all Broxtowe town and district centres are vital and viable, not vulnerable.
- Likely effects of development on any town centre strategy. No information is provided in this respect.
- Impact on any other planned investment. Likewise, no information is provided in this respect.

The detailed requirements of paragraph 016 of the NPPG has, effectively, been ignored.

We accept that a lower threshold should be utilised where local circumstance calls for it. It should not however be applied as a tool to unnecessarily restrict growth and investment. In view of the above, the policy and therefore the Part 2 Local Plan as currently drafted is not deemed to be 'sound' as the 500sqm threshold has not been suitably justified or evidenced. As such, we consider the default threshold of 2,500 sqm identified in the NPPF should be applied.